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

MAR 6 2006

Dr. Tony Zohrab
Director, Animal Products Group
New Zealand Food Safety Authority (NZFSA)
South Tower, 86 Jervois Quay
PO Box 2835
Wellington, New Zealand

Dear Dr. Zohrab:

This letter transmits the final report of the Food Safety and Inspection Service on-site audit of the New Zealand meat and poultry inspection system conducted October 6 through November 18, 2005. Comments from the government of New Zealand have been included as an attachment to the enclosed final 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 e-mail at sally.white@fsis.usda.gov.

Sincerely,

Sally White

Sally White
Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc:
David Rosenbloom, Counselor, US Embassy, Wellington
Jason Frost, Technical Coordinator Veterinary Services, Embassy of New Zealand
Barbara Masters, Administrator, FSIS
Linda Swacina, Executive Director, FSIA, OIA
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Country File

FINAL

FINAL REPORT OF AN AUDIT CARRIED OUT IN NEW ZEALAND COVERING NEW ZEALAND'S MEAT AND POULTRY INSPECTION SYSTEM

OCTOBER 6 THROUGH NOVEMBER 18, 2005

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

ATM	Agency Technical Manager
CCA	Central Competent Authority, the New Zealand Food Safety Authority (NZFSA)
CIG	Compliance and Investigation Group
E. coli	*Escherichia coli*
FSIS	Food Safety and Inspection Service
GREX	General Export Requirements
MAF	Ministry of Agriculture and Forestry
MSOE	Ministry of State-Owned Enterprises
NOID	Notice of Intent to Delist
NZFSA	New Zealand Food Safety Authority
OMAR	Overseas Market Access Requirement
PR/HACCP	Pathogen Reduction/ Hazard Analysis and Critical Control Point Systems
SPCS	Statistical Process Control System
SSOP	Sanitation Standard Operating Procedures
Salmonella	*Salmonella* species
TD	Technical Directive
TL	(NZFSA VA) Team Leader
TTS	Traveling Technical Supervisor
VA	Verification Agency
VTS	Veterinary Technical Supervisor

1. INTRODUCTION

The audit took place in New Zealand from October 6 through November 18, 2005.

An opening meeting was held on October 6 in Wellington 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 New Zealand's meat and poultry inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the New Zealand Food Safety Authority (NZFSA), and by representatives from the regional and local inspection offices.

2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the Senior Program Auditor followed routine meat and poultry inspection audit procedures. The following sites were visited: the headquarters of the CCA, two regional inspection offices, five laboratories performing analytical testing on United States-destined product, 10 slaughter and processing establishments, and three meat processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	1	Wellington
	Regional	2	Hamilton and Christ-church
Laboratories		5	
Slaughter and Processing Establishments		10	
Meat Processing Establishments		3	

3. PROTOCOL

The official on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in New Zealand's inspection headquarters and regional offices. The third part involved on-site visits to 13 establishments (10 slaughter establishments and three processing establishments). The fourth part involved visits to four private laboratories and one government laboratory. The privately-owned and operated Gribbles Analytical Laboratory in Hastings was conducting analyses of field samples for the presence of *Salmonella* species and generic

Escherichia coli (*E. coli*). The privately-owned and operated Hill Laboratory, Ltd. in Christchurch and the private laboratory in Establishment ME-43 were conducting analyses of samples for the presence of generic *E. coli.* Finally, the government-owned and operated AgriQuality New Zealand, Ltd. laboratory in Lower Hutt and the privately owned-and operated Hill Laboratory, Ltd. in Hamilton were conducting analyses of field samples for New Zealand's national residue control program.

Program effectiveness determinations of New Zealand's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP), (2) animal disease controls, (3) slaughter/ processing controls, including the implementation and operation of Hazard Analysis/Critical Control Point (HACCP) programs and the testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including the testing program for *Salmonella* species. New Zealand'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 New Zealand and determined if establishment and inspection system controls were in place to ensure the production of meat and poultry products that are safe, unadulterated and properly labeled.

During the opening meeting, the auditor explained that New Zealand's inspection system would be audited in accordance with two areas of focus. First, the auditor would audit against FSIS requirements. These include daily inspection in all certified establishments, humane handling and slaughter of animals, the handling and disposal of inedible and condemned materials, species verification, and FSIS' requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella* species.

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

Currently, FSIS has determined that five alternate procedures are equivalent to FSIS requirements, regarding alternate testing measures for generic *E. coli,* alternate testing measures for *Salmonella* species, alternate post-mortem inspection procedures for lambs and 5- to 10-day-old "bobby" calves, and permission to slaughter, dress, and/or process equines in an establishment in which other species are also slaughtered, dressed, and/or processed.

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 and Poultry Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations, and

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

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 last two FSIS audits of New Zealand's inspection system were conducted in June-July 2003 and September-October 2004.

During the 2003 audit, no establishments were delisted. Two establishments received Notices of Intent to Delist (NOID) if the deficiencies identified were not adequately addressed and corrected within 30 days of the audits.

During the 2003 audit, the following deficiencies were identified:

- In nine establishments, the written corrective actions to be taken, in the event that critical limits are exceeded, did not include reinspection of the product back to the last acceptable monitoring check.

- In one establishment, maintenance of hand-operated rail gates had been neglected.

- In one establishment, the written corrective actions to be taken in case of contamination with feces/ingesta did not include product disposition.

- Small amounts of fecal contamination were found on one lamb carcasses that had passed final inspection in each of two establishments.

- In three establishments, employees were not adequately washing contaminated hands.

- In one establishment, condensation was not adequately controlled.

- In one establishment, poor housekeeping in edible-product support areas was identified.

- In one establishment, previously-identified deteriorated product contact equipment remained in use.

- In one establishment, there was inadequate separation of work clothes and street clothes.

All the abovementioned deficiencies had been addressed and corrected by the FSIS audit in 2004.

The following deficiencies were identified during the 2004 audit:

- In one residue-testing laboratory, there was insufficient documentation that the procedures for servicing and system suitability/verification, as recommended by the manufacturers, were being routinely performed.

- In one residue-testing laboratory, the training program for new analysts was not clearly outlined; detailed requirements for the attainment of proficiency (e.g. bench-training, number of analyses required to be performed correctly) were not evident.

- In one residue-testing laboratory, control charts containing QC spikes and blind spiked recoveries were not plotted for the results of pesticide analyses.

- In one residue-testing laboratory, several illegible corrections were found in the official documentation.

- In one residue-testing laboratory, the acceptability criteria for the monthly check samples were not consistent with those used for the daily positive-control spiked samples.

6. MAIN FINDINGS

6.1 Government Oversight

6.1.1 CCA Control Systems

Oversight of the New Zealand meat and poultry inspection system is provided by NZFSA a semi-autonomous body in the Ministry of Agriculture and Forestry (MAF) under the Minister for Food. Oversight of meat and poultry inspection in the slaughter and processing establishments is under the Ministry of State Owned Enterprises (MSOE).

NZFSA came into being on 1 July 2002, bringing together domestic and processed food functions from the Ministry of Health and the primary production, processing and export functions from MAF Food, together with a small part of the MAF policy group, into a semi-autonomous body, the NZFSA, attached to MAF. NZFSA was restructured on July 1, 2005, providing horizontal groups in place of the former vertical, commodity-based groups, to enable it to function in a risk-based environment. NZFSA is comprised of the following groups, each of which is headed by a Director who reports to the Executive Director and is a member of the NZFSA Board:

- New Zealand Standards Group (NZSG)
- Export Standards Group (ESG)
- Approvals and Agricultural Compounds and Veterinary Medicines
- Compliance and Investigation Group (CIG)

- Science
- Policy and Joint Food Standards (with Food Standards Australia and New Zealand)
- Communications and Infrastructure
- NZFSA Verification Authority (NZFSA VA, usually shortened to VA)

There is an additional Director (Market Access) who is not a board member, and who interacts with the Deputy Director (Market Access) and the Programme Managers (Market Access) within the Export Standards Group. These persons are responsible for ensuring that requirements necessary for access to various markets that are additional to the New Zealand Standards are published for implementation by industry and by ASURE NZ, and are verified by VA.

Oversight is provided by NZFSA through the CIG, the ESG, and VA. The Director (Market Access) of ESG is the FSIS contact or chief veterinary officer for New Zealand's meat and poultry inspection system. MSOE provides oversight through ASURE New Zealand. The various responsibilities of these organizations are outlined in a Memorandum of Understanding, dated June 2003, stating that MAF/NZFSA/ESG - NZSG (formerly the Animal Products Group) sets the standards, applies sanctions, and provides the statutory authorization to VA and ASURE. NZFSA CIG audits the performance of VA, ASURE, and industry. VA implements the standards, verifies that they are met, and certifies product. ASURE inspects livestock and product and performs associated tasks such as slaughter brand control and product sampling. Both VA and ASURE have divided their field staff according to the locations, numbers, and complexity of the establishments. VA is divided into nine regions, each managed by a Team Leader who maintains technical competence (the Team Leader position in Hastings is presently being advertised because the incumbent is taking up a new role coordinating the VA Technical Specialists Group). ASURE managers are located in numerous offices around the country as needed to provide oversight for the ASURE staff in the establishments.

6.1.2 Ultimate Control and Supervision

VA maintains a physical presence in all establishments where ASURE inspectors are assigned. ASURE inspectors perform post-mortem inspection and related activities, and may perform ante-mortem inspection as well; most ante-mortem inspection is performed by NZFSA Technical Supervisors, who are veterinarians. VA is required to verify that ASURE employees are effectively delivering their mandatory functions and that establishments are in compliance with all New Zealand and FSIS requirements.

New technical information is distributed to all meat and poultry inspection employees via Overseas Market Access Requirements (OMARs), General Export Requirements (GREX), and Technical Directives (TDs). OMAR and GREX documents are based on the Animal Products Act of 1999 and TDs are based on the Meat Act of 1981.

Information on new and updated requirements is sent from NZFSA headquarters directly to all NZFSA field personnel, ASURE managers, and establishment management officials via e-mail. The Agency Technical Manager (ATM) conducts a weekly teleconference that is attended by all NZFSA Team Leaders (TL). The Veterinary

Technical Supervisors (VTS) and Traveling Technical Supervisors (TTS) in remote locations provide monthly reports to the TL specifying the compliance synopses of the establishments and also synopses of the technical information they have received during the month, as well as what they have done to ensure establishment compliance. For less remote locations, there are weekly circuit meetings in which all current issues are discussed and correlated; either the TL or the TL's Unit Coordinator attends these meetings. Each TL provides a (monthly) Approved Signatory Report to the ATM; this report includes the minutes from these meetings, the monthly synopses, certification issues, complaints and appeals, ASURE issues, VA procedural issues, compliance issues, and recommendations regarding technical specifications.

The TL appraises the performances of each supervising veterinarian annually. The TL and the supervising veterinarian together evaluate the performances of each VTS and each TTS, also annually.

ASURE serves the meat and poultry inspection program in a unique environment. On the one hand, ASURE is obliged to make a profit as a State-Owned Enterprise; however, on the other hand, ASURE is not allowed to make a profit from the costs imposed on industry for meat and poultry inspection. ASURE is, therefore, commercially driven to provide "Added Value" work that ASURE performs for industry on a fee basis. However, only 2-3 percent of ASURE's income comes from fee work. Fees are standardized, payments are made directly to ASURE headquarters, and the employees are always accountable to ASURE.

In order to perform fee work, an ASURE employee temporarily turns in ("surrenders") his/her Warrant (authorization to inspect), performs the work, and retrieves the Warrant before performing mandatory inspection work. Occasionally, an employee will perform long-term fee work or work on a trial basis before actually leaving ASURE. However, ASURE is required to implement measures to identify and manage potential areas of conflict of interest in order to meet the relevant standards of NZFSA.

6.1.3 Assignment of Competent, Qualified Inspectors

The process of maintaining competency and compliance is approached differently by NZFSA, VA, and ASURE. NZFSA performs CIG audits, on a periodic basis, that cover VA, ASURE, and industry activities and compliance. VA performs Technical Reviews of establishment compliance and inspection activities and conducts Performance Based Verification (PBV) audits and Bulk Audits of each Establishment and of the ASURE presence within that establishment. VA also performs frequent Regulatory Overviews at each establishment. ASURE performs Statistical Process Control System (SPCS) Checks on the various aspects (22 Systems) of inspection that they monitor or perform. SPCS Checks include Procedures Checks and Decision Checks.

The VA Technical Reviews, in combination with CIG Audits, comply with the monthly supervisory visits required by FSIS. Team Leaders and Unit Coordinators perform this function for VA and maintain their competency via the Quality Assurance Assessor, who is supervised by the VA Technical Manager.

The Director General, through the Director (Market Access), negotiates a basic formula for ASURE staffing, which is subject to some modification according to individual requirements. The basic formula for staffing to meet NZFSA mandatory requirements is determined by ASURE; this obligation is placed on ASURE in the Memorandum of Understanding between NZFSA, NZFSA VA, and ASURE. The VA VTS has the authority to order a decrease in line speed if he/she finds it necessary for the post-mortem inspectors to perform their duties adequately. If the VTS is not confident that the staffing is adequate, he/she informs the TL, who will confer with his/her counterpart (Regional Manager) in ASURE to resolve the issue. If the issue cannot be resolved at this level, it will be elevated to involve the Deputy Director (Market Access, Animal Products) and the CEO for ASURE in Wellington.

6.1.4 Authority and Responsibility to Enforce the Laws

Accountability for administrative and technical activities also varies between VA and ASURE. The VA Technical Manager is technically accountable to the Director (Market Access) of the ESG. However, this manager is administratively accountable to and supervised by the General Manager for VA. The Agency Technical Manager is the supervisor of the Team Leaders, who manage the field inspection staff. In contrast, the ASURE Technical Manager does not directly supervise the field inspection staff, and most of the Area/Site Managers who do have supervisory responsibilities, do not maintain their technical competence in meat and poultry inspection.

One establishment received a NOID and U.S. requirements were found not to have been adequately enforced in eight of the thirteen establishments audited.

6.1.5 Adequate Administrative and Technical Support

NZFSA VA has the ability to support a third party audit.

6.2 Headquarters Audits

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

- Internal review reports
- Supervisory visits to establishments that were certified to export to the U.S.
- Changes to structure and staffing
- Training records for inspectors and laboratory personnel, including courses in HACCP and SSOP
- New laws and implementation documents such as regulations, notices, directives and guidelines, including official communications with field personnel, both in-plant and supervisory, in which U.S. requirements are conveyed
- Sampling and laboratory analyses for residues
- Sanitation, slaughter and processing inspection procedures and standards

- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials
- Enforcement records, including examples of criminal prosecution, seizure and control of noncompliant product, and delisting an establishment that is certified to export product to the United States
- A summary of the species verification policy & program
- Control of products imported from other countries for use in US-eligible product

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

6.3.1 Audits of Regional Inspection Offices

In the course of the routine audit, the auditor interviewed two regional VA Team Leaders in their offices in Hamilton and Christchurch, in order to discuss delivery of oversight and to review documents regarding internal review reports and other supervisory visits to establishments that were certified to export to the U.S., training records for NZFSA officials, and export product inspection and control, including export certificates. No concerns arose as a result of these interviews.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 13 establishments—10 slaughter/processing establishments and three processing establishments. None were delisted by New Zealand because of failure to meet basic U.S. requirements, and one received a NOID because of evidence of the presence of rodents in the carton storage area. The NZFSA authorities conducted an in-depth follow-up review of this establishment within 30 days and verified that all the deficiencies identified on the day of the original audit had been addressed and corrected, and removed the NOID.

8. LABORATORY AUDITS

During laboratory audits, emphasis is 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 auditors evaluate compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements.

The following laboratories were audited:

- The government-owned and operated AgriQuality New Zealand, Ltd. laboratory in Lower Hutt
- The privately-owned and operated R. J. Hill Laboratory, Ltd. in Christchurch
- The privately-owned and operated R. J. Hill Laboratory, Ltd. in Hamilton
- The privately-owned and operated Gribbles Analytical Laboratory in Hastings
- The private microbiology laboratory in Establishment ME-43 in Eltham

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

9. SANITATION CONTROLS

As stated earlier, the FSIS auditors focus on five areas of risk to assess New Zealand'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, New Zealand's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

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

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The SSOP in the 12 of the 13 establishments were found to meet the FSIS regulatory requirements.

- In one establishment, documentation of corrective actions taken in response to some deficiencies identified during pre-operational sanitation inspection did not include preventive measures. It was noted that documentation of *operational* sanitation activities, findings, and corrective actions (including preventive measures) was complete and in full compliance.

9.2 OTHER SANITATION CONCERNS

In three of the 13 establishments audited, the Sanitation Performance Standards were not met:

- In one establishment, rodent feces were found in several areas of the main carton storage room. It was noted that close examination of cartons stored in the area revealed no evidence of their having been damaged by rodent activity.

- In two establishments, edible product containers were cracked and in need of repair or replacement.

- In one establishment, general housekeeping and maintenance had been neglected in the carton preparation room.

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 New Zealand's inspection system had adequate controls in place. No deficiencies were noted.

Furthermore, lamb and bobby calf slaughter were performed in accordance with the alternate procedures determined to be equivalent by FSIS: Heads and tongues of lambs and bobby calves are permitted to be removed prior to post-mortem inspection.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS 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

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

The HACCP programs were reviewed during the on-site audits of the 13 establishments. In seven establishments, the HACCP slaughter/processing programs were not implemented as required:

- In three establishments, the documentation records for verification of the monitoring activities did not contain the actual times when the verification procedures were performed.

- In two establishments, the details of the verification procedures were not adequately described in the written HACCP plans.

- In one establishment, the monitoring records did not contain the actual times when the monitor observed the critical limits to be exceeded.

- In one establishment, there was insufficient supporting documentation that physical hazards had been considered during the hazard analysis.

11.3 Testing for Generic *E. coli*

New Zealand has adopted the FSIS regulatory requirements for testing for generic *E. coli* with the exception of the following equivalent measures, which have been determined to be equivalent by FSIS:

- The testing frequency in lambs and sheep is five carcasses per week; this alternate frequency was written into the HACCP plans as required in all the lamb slaughter establishments visited during this audit.
- New Zealand samples cattle at three sites: flank, brisket, and outside hind-leg.
- New Zealand samples bobby calves prior to chilling, at three sites: flank, foreleg, and fore-rump, using a round 25 cm^2 template.
- New Zealand uses a swab sampling tool.

Ten of the 13 establishments audited were required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in all of the 10 slaughter establishments in which it was required. However, in two of these, evaluation of the results of the testing for generic *E. coli* was not performed in accordance with the requirements of the FSIS regulations:

- In two establishments, statistical process control procedures had not been developed to evaluate the results of the beef carcass swabs for generic *E. coli*, as required when the samples are taken by sponging [or swabbing] rather than by excision.

The privately-owned and operated R. J. Hill Laboratories, Ltd. in Christchurch; the Gribbles Analytical Laboratories in Hastings; and the private laboratory in Establishment ME-43, in which swab samples from U.S.-eligible product are analyzed for generic *E. coli*, were audited. No deficiencies were noted.

11.4 Testing for *Listeria monocytogenes*

One of the establishments audited was producing ready-to-eat products (beef jerky). In this establishment, the requirements for testing for *Listeria monocytogenes* according to the Final Rule of June 6, 2003, were being followed.

11.5 Facilities for Inspection

USDA regulations require 50 foot-candles (550 Lux) of shadow-free light at inspection surfaces. This requirement was not met in two of the ten slaughter establishments.

- Light levels were inadequate in two establishments (in beef thoracic cavities in one and on medial masseter muscles in beef heads in the other).

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.

The Hill Laboratories, Ltd. in Hamilton were audited. No concerns resulted from this audit.

The government-owned and operated AgriQuality New Zealand, Ltd. laboratory in Lower Hutt was audited. One concern resulted from this audit:

- The quality control program did not provide adequate assurance that all analysts would participate in the intra-laboratory check sample program with reliable frequency. Under the system as implemented, some analysts might not perform a specific assay for as long as thirteen months before their proficiency would be evaluated by means of an intra-laboratory check sample.

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* species.

13.1 Daily Inspection in Establishments

Documented daily inspection was provided in all 13 of the establishments audited for production days on which U.S.-eligible product was produced.

13.2 Testing for *Salmonella* Species

New Zealand has adopted the FSIS regulatory requirements for testing for *Salmonella* species with the exception of the following equivalent measures, which have been determined to be equivalent by FSIS:

- Establishments take samples.
- Private laboratories analyze samples.
- A swab sampling tool is used.
- Samples are taken at the end of the slaughter or production process and prior to the carcass being cut and/or packaged.

Six of the 13 establishments audited were required to meet the basic FSIS regulatory requirements for testing for *Salmonella* species and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* species was properly conducted in all of the six establishments in which it was required.

The privately-owned and operated Gribbles Analytical Laboratories in Hastings, in which field samples of U.S.-eligible product are analyzed for *Salmonella* species, was audited. No deficiencies were noted.

13.3 Species Verification

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

13.4 Monthly Reviews

In July 2005, NZFSA implemented a policy of monthly internal supervisory reviews to meet the U.S. requirement. Since that time, monthly reviews had been conducted, and were well-documented, for all months during which U.S.-eligible production had been conducted in twelve of the thirteen establishments audited.

- In one establishment, one internal supervisory review had not been conducted during a month in which there had been U.S.-eligible production.

13.5 Inspection System Controls

Except as noted below, 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 one establishment, sternums were not split on the lamb carcasses prior to post-mortem inspection.

Furthermore, controls were in place for the importation of only eligible meat and poultry products from other countries for further processing, security items, shipment security, and products entering the establishments from outside sources.

Lamb and bobby calf slaughter were performed in accordance with the alternate procedures determined to be equivalent by FSIS: Post-mortem inspection of lambs and bobby calves without the heads and tongues is permitted.

National mandates for the implementation of compliance with the requirements for special handling of Specified Risk Materials (SRMs) regarding Bovine Spongiform Encephalopathy (BSE) have been implemented as Overseas Market Access Requirements (OMARs). Non-ambulatory cattle are condemned upon ante-mortem inspection, no beef containing SRMs is permitted in U.S.-eligible product, mechanically-separated beef is ineligible for use in U.S.-eligible product, and air-injection stunning is not permitted in New Zealand.

One establishment received a NOID, which was lifted by NZFSA officials after they had verified that adequate corrective actions had been taken. In eight of the 13 establishments audited, deficiencies were found that should have been identified in advance by NZFSA. These involved:

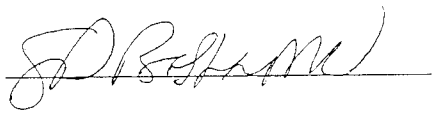
- HACCP-Implementation (8 establishments)
- Sanitation (3 establishments)
- Evaluation of testing results for generic *E. coli* (2 establishments)
- Post-mortem inspection (1 establishment)
- Light at an inspection station (2 establishments)
- One monthly internal review not performed (1 establishment)

14. CLOSING MEETING

A closing meeting was held on November 18, 2005, in Wellington with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Gary D. Bolstad, DVM
Senior Program Auditor



15. ATTACHMENTS

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
Jack Link's New Zealand Limited Mangere, Auckland	Oct. 19, 2005	JL1	New Zealand
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Gary D. Bolstad		[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 SSOPs 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.	
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	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	O
57. Monthly Review	
58.	
59.	

80. Observation of the Establishment

A - D

Est. JL1, Jack Link's New Zealand, Ltd.; Mangere, Auckland, New Zealand; Oct. 19, 2005.

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

81. NAME OF AUDITOR	82. AUDITOR SIGNATURE AND DATE
Gary D. Bolstad, DVM	Oct. 19, 2005

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
Riverlands Ltd. Eltham Eltham	Oct. 7, 2005	ME-43	New Zealand
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Gary D. Bolstad	[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 SSOPs 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.	
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.	X
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	X
39. Establishment Construction/Maintenance	X
40. Light	X
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	O
57. Monthly Review	
58. Notice of Intent to Delist	X
59.	

60. Observation of the Establishment

Est. ME-43, Riverlands Ltd.; Eltham, New Zealand; October 7, 2005

22/51 The documentation of verification records was complete, except that they did not contain the actual times when the verification procedures were performed. The management official responsible for the verification agreed to correct this immediately. [Regulatory references: 9CFR §417.5 (b), §417.8]

40/51 A light intensity of 50 foot-candles (550 Lux) is required at inspection surfaces. A light level of only 30 fc (330 Lux) was measured on the inspection surfaces of the bovine thoracic cavities. The NZFSA officials ordered prompt correction. [9CFR §307.2(m)(2)]

38/51 Rodent feces were found in several areas of the main carton storage room. Close examination of cartons stored in the area revealed no evidence of their having been damaged by rodent activity. The NZFSA officials ordered prompt correction. [9CFR §416.2(a)(3), §416.17]

39/51 General housekeeping and maintenance had been neglected in the carton preparation room. The NZFSA officials ordered prompt correction. [9CFR §416.2, §416.17]

58 The NZFSA-VA CIG Assessor and the NZFSA-VA Team Leader issued to the establishment a Notice of Intent to Delist (NOID) in 30 days if the deficiencies identified are not addressed and corrected within that time.

Note: The NZFSA authorities conducted an in-depth follow-up review of this establishment on November 2, 2005 and verified that all the deficiencies identified on the day of the original audit had been addressed and corrected; they removed the NOID accordingly on November 4, 2005.

61. NAME OF AUDITOR
Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE
Oct. 7, 2005

Est. ME-58, PPCS Takapau Ltd., Takapau, New Zealand; October 14, 2005

22/51 The documentation of verification records was complete, except that they did not contain the actual times when the verification procedures were performed. The management official responsible for the verification agreed to correct this immediately. [Regulatory references: 9CFR §417.5 (b), §417.8]

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
Blue Sky Meats; Morton Mains (Invercargill)	Nov. 9 2005	MP-80	New Zealand
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Gary D. Bolstad		[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 SSOPs 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.	
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	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

80. Observation of the Establishment

1 - 46

Est. ME-80, Blue Sky Meats; Morton Mains (Invercargill), New Zealand; November 9, 2005

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

81. NAME OF AUDITOR	82. AUDITOR SIGNATURE AND DATE
Gary D. Bolstad, DVM	Nov. 9, 2005

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
Progressive Meats, Ltd. Hastings	Oct, 12, 2005	ME-87	New Zealand
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Gary D. Bolstad	[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 SSOPs 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.	
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.	X
Part C - Economic / Wholesomeness	
23. Labeling - Procuct 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	X
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	O
57. Monthly Review	
58.	
59.	

Est. ME-87, Progressive Meats, Ltd., Hastings, New Zealand; October 12, 2005

22/51 The documentation of monitoring records was complete, except that they did not contain the actual times when the monitor observed the critical limits to be exceeded. The management official responsible for the monitoring agreed to correct this immediately. [Regulatory references: 9CFR §417.5 (b), §417.8]

45/51 The majority of product containers for edible offal were cracked and in need of repair or replacement. The NZFSA-VA officials ordered prompt correction. [9CFR §416.3(a), §416.17]

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Wallace Corporation Ltd. Waitoa	Oct 20, 2005	ME-100	New Zealand
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Gary D. Bolstad		[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.	
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.	X
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.	X
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	X
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	O
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	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

4-55

Est. ME-100, Wallace Corporation Ltd., Waitoa, New Zealand; October 20, 2005

19/51 Verification of the monitoring procedures was being performed routinely and the person performing the verification understood and described his responsibilities well; however, the details of the verification procedures were not adequately described in the written HACCP plan. The management official responsible for the HACCP plan agreed to correct this immediately. [Regulatory references: 9CFR §417.2(b)(7) and §417.8]

22/51 The documentation of verification records was complete, except that they did not contain the actual times when the verification procedures were performed. The management official responsible for the HACCP plan agreed to correct this immediately. [9CFR §417.5(b) and §417.8]

28/51 The establishment had not developed a statistical process control procedure to evaluate the results of the carcass swabs for generic *E. coli*. The upper limit had been set at 100 cfu/cm^2. This upper limit was implemented in U.S.-eligible beef slaughter establishments in April 2005 in Chapter 6 of the updated National Microbiological Database program. "Excision" samples were also being analyzed, but not from the areas of the carcasses required by FSIS to be sampled for generic *E. coli*. Samples from five cartons of boneless beef were taken per week. [9CFR §310.25(a)(5)(ii)]

61. NAME OF AUDITOR
Sam D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE
Oct 20, 2005

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
PPCS Silverstream Mosgiel	Nov. 7, 2005	MP-113	New Zealand
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Garv D. Bolstad	[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.	
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	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	O
57. Monthly Review	
58.	
59.	

80. Observation of the Establishment

A-53

Est.ME-113, PPCS Silverstream, Mosgiel, New Zealand; November 7, 2005.

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

Note: Regarding items 27-35 and 52-55 – in spite of the ME designation in the establishment name (usually indicating a slaughter facility), this establishment's operations have involved processing only since approximately 1992.

81. NAME OF AUDITOR

Gary D. Bolstad, DVM

82. AUDITOR SIGNATURE AND DATE

Nov. 7, 2005

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
Clover Export, Ltd. Gore	Nov. 10, 2005	MP-117	New Zealand
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Gary D. Bolstad	[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.	
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	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

61. Observation of the Establishment

4-86

Est. ME-117, Clover Export, Ltd., Gore, New Zealand; November 10, 2005

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
Dan E. Bolstad, DVM	[signature] NOV. 10 2005

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
Greenlea Premier Meats, Ltd Hamilton, NZ	Oct 18, 2005	ME-124	New Zealand
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Gary D. Bolstad	[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.	X
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.	
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	X
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	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	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	O
57. Monthly Review	
58.	
59.	

80. Observation of the Establishment

Est. ME-124, Greenlea Premier Meats, Ltd., Hamilton, New Zealand; October 18, 2005.

13/51 The documentation of pre-operational sanitation deficiencies did not include adequate descriptions of measures taken to prevent recurrence. The NZFSA officials ordered prompt correction. [Regulatory references: 9CFR §416.15(b) and §416.17]

28/51 The establishment had not developed a statistical process control procedure to evaluate the results of the carcass swabs for generic *E. coli*. The upper limit had been set at 100 cfu/cm^2. This upper limit was implemented in U.S.-eligible beef slaughter establishments in April 2005 in Chapter 6 of the updated National Microbiological Database program. "Excision" samples were also being analyzed, but not from the areas of the carcasses required by FSIS to be sampled for generic *E. coli*. Samples from five cartons of boneless beef were taken per week. [9CFR §310.25(a)(5)(ii)]

81. NAME OF AUDITOR

Gary D. Bolsted, DVM

82. AUDITOR SIGNATURE AND DATE

Oct. 18, 2005

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
PPCS Dargaville Dargaville	Oct., 27, 2005	ME-125	New Zealand
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Gary D. Bolstad	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
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12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
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18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
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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	X
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	O
57. Monthly Review	X
58.	
59.	

Est. ME-125, PPCS Dargaville; Dargaville, New Zealand; October 27, 2005

40/51 FSIS requires a light intensity of 50 foot-candles (fc), or 550 Lux at inspection surfaces. A light intensity of only 40 fc (440 Lux) was measured at the inspection surface of the medial masseter muscles in the beef heads. The NZFSA officials ordered prompt correction. [9CFR §307.2(m)(2)]

51/57 Before July 2005, the frequency of internal supervisory reviews ("Technical Reviews") was determined by compliance history, under New Zealand's Performance-Based Verification (PBV) system; the highest level of compliance led to a frequency of every three months. In July 2005, NZFSA implemented monthly technical reviews to comply with the FSIS requirement. This establishment was closed from August 26 to September 26, 2005; however, it did produce U.S.-eligible product during September 27-31. No internal supervisory review was conducted in September 2005. [9CFR §327.2(a)(2)(iv)(A)]

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
CMP Rangitikei Bulls	Oct, 10, 2005	ME-188	New Zealand
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Gary D. Bolstad		[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 SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
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Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
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20. Corrective action written in HACCP plan.	
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23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
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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	O
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	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

A-16

Est. ME-188: CMP Rangitikei, Ltd., Bulls, New Zealand; October 10, 2005

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

61. NAME OF AUDITOR

Sam D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

Oct. 10 2005

United States Department of Agriculture
Food Safety and Inspection Service

A-12a

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Rakaia River Meats, Ltd. Rakaia	Nov. 2, 2005	MP-500	New Zealand

5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT
Dr. Garv D. Bolstad	[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	
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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.	
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Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
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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	X
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

A-12b

Est. ME-500, Rakaia River Meats, Ltd., Rakaia, New Zealand; November 2, 2005

15/51 There was not adequate documentation that physical hazards had been considered during the hazard analysis. [Regulatory reference: 9CFR §317.2 (a)(3)(x)]

51/55 Sternums were not split on the lamb carcasses prior to ante-mortem inspection. [9CFR §310.12]

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

Nov. 2, 2005

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
ANZCO Foods Green Island Green Island	Nov. 4, 2005	PH-173	New Zealand
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Gary D. Bolstad		[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.	
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12. Corrective action when the SSOPs 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	
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20. Corrective action written in HACCP plan.	
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22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
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23. Labeling - Procuct 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	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	X
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	O
51. Enforcement	X
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	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

4-38

Est.PH-173, ANZCO Foods Green Island; Green Island, New Zealand; November 4, 2005.

15/51 Verification of the monitoring procedures was being performed routinely and the person performing the verification understood and described his responsibilities well; however, the details of the verification procedures were not adequately described in the written HACCP plan. The management official responsible for the HACCP plan agreed to correct this immediately. [Regulatory reference: 9CFR §417.2(c)(7) and §417.8]

45/51 Several stainless-steel combo bins used for edible product were cracked and in need of repair. The NZFSA officials ordered immediate corrective action. [9CFR §416.3(a) and §416.17]

NEW ZEALAND FOOD SAFETY AUTHORITY

Ref: M-USA000

17 February 2006

Sally White, Esquire
Director, International Equivalence Staff
Office of International Affairs
Food Safety Inspection Service
Room 2137-South Building
U.S. Department of Agriculture
Washington DC, 20250
UNITED STATES OF AMERICA

Dear Sally

Response to Final Audit Report

Thank you for the opportunity of responding to the Draft Final Audit Report for the FSIS Inspection 6 October to 18 November 2005 and your letter that accompanied that report dated 29 December 2005.

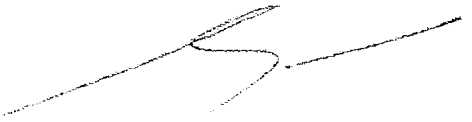
Firstly, I would like to express our general agreement with the conclusions of the audit report and acknowledge them as being a true reflection of the performance of the New Zealand programme.

There are some corrections required to ensure the accuracy of the final report, they are as follows:

1. ABBREVIATIONS AND SPECIAL TERMS USED IN THE AUDIT REPORT
   "VA Verification Authority" should read "Verification Agency".
2. Section 2, end of second paragraph we think that it should read: ".meat processing establishments..."
3. Section 5, buliet 5 the word "washing" should be inserted prior to "contaminated hands".
4. Section 6.1.1 CCA Control Systems, the words "under the Ministry for Food" should read: "under the Minister for Food." Oversight of the meat and poultry inspection in slaughter and processing establishments is a Verification Agency function. The SOE, Asure controls/conducts the actual inspection activities.
5. Section 6.1.2 Ultimate Control and Supervision, the second sentence refers to ASURE inspector performing ante mortem inspection. The reference should be that they may perform ante mortem inspection. The reality is that most ante mortem inspection is performed by NZFSA Technical Supervisors who are in fact veterinarians. Additionally, the third sentence in that paragraph should commence with "VA is required to verify..".
6. 6.1.3, final paragraph on page 9, there is no longer a Director (Animal Products) and should be replaced with Director (Market Access) when referenced in future. The MoU between NZFSA, NZFSA VA and Asure places certain obligation upon Asure. As a result they are required to determine the basic formula for staffing to meet NZFSA mandatory requirements.
7. 13.2, paragraph 4 refers to the Gribbles Laboratory being publicly owned when in fact it is privately owned.
8. Appendix A-12a has box 54 marked when in fact it should be box 55 as the deficiency related to sternums not being cut.

Should you have any questions with regard to this letter I would be happy to discuss them with you. Please advise me in the first instance by e-mail at tony.zohrab@nzfsa.govt.nz .

Yours Sincerely



Dr Tony Zohrab
Director (Market Access)