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

NOV 23 2005

Mr. Robert Houston
Chief Veterinary Officer
Department of Agriculture for Northern Ireland
DARD
Dundonald House
Upper Newtownards Road
Belfast, BT 4 3SB
Northern Ireland

Dear Mr. Houston:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Northern Ireland's meat inspection system from May 9 – May 19, 2005. Enclosed is the final audit report. We have attached to the report your letter of 19 October 2005, commenting on the draft final report of the same audit.

We appreciate the actions taken by Northern Ireland to correct the deficiencies identified during the audit. If you have any questions regarding the FSIS audit, please contact me at my telephone number (202) 720-3781. You may also reach me at my facsimile number (202) 690-4040 or email address sally.white@fsis.usda.gov.

Sincerely,

Sally White JD

Sally White, Director
International Equivalence Staff
Office of International Affairs

Enclosure

Cc:
Besa Kotati, Minister Counselor, American Embassy London
James Hughes, Agricultural Attaché, British Embassy, Washington, DC
Canice Nolan, Agriculture, Fisheries, Food Safety and Consumer Affairs Section
European Commission Delegation, Agric./Consumer Affairs, EU Mission to the U.S.
Norval Francis, Minister-Counselor, US Mission to the EU in Brussels
Robert Macke, Assistant Deputy Administrator, ITP, FAS
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Mary Stanley, Director, IID, OIA, FSIS
Linda Swacina, Executive Director, FSIA, OIA
Jack Mowbray, IES, OIA, FSIS
Country File

FINAL

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

MAY 9 THROUGH MAY 19, 2005

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 of Agriculture and Rural Development – DARD)
CVO	Chief Veterinary Officer
DARD	Department of Agriculture and Rural Development
DCVO	Deputy Chief Veterinary Officer
E. coli	*Escherichia coli*
FSA	Food Standards Agency
FSIS	Food Safety and Inspection Service
GLP	Good Laboratory Practices
NIFLEG	Northern Ireland Food Law Enforcement Group
NIFSG	Northern Ireland Food Safety Group
OVS	Official Veterinary Surgeon
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point System
Salmonella	*Salmonella* species
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedures
TVO	Temporary Veterinary Official
UKAS	United Kingdom Accreditation Service
VEA	European Community/United States Veterinary Equivalence Agreement

1. INTRODUCTION

The audit took place in Northern Ireland from May 10 to May 19, 2005.

An opening meeting was held on May 10, 2005 in Belfast with the Central Competent Authority (CCA). At this meeting, the audit team confirmed the objective and scope of the audit, the audit team's itinerary, and requested additional information needed to complete the audit of Northern Ireland's meat inspection system.

The audit team was accompanied during the entire audit by a representative from the CCA, the Department of Agriculture and Rural Development (DARD) and, when appropriate, representatives from the regional and local inspection/establishment offices.

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 meat producing/storage establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, two regional inspection offices, four laboratories (three government, one private) performing analytical testing on U.S.-destined product, one swine slaughter/processing establishment, and one cold storage facility.

Competent Authority Visits			**Comments**
Competent Authority	Central	1	DARD in Belfast
	Regional	2	North Region and South Region
	Local	2	Establishment Level
Laboratories		4	
Meat Slaughter/Processing Establishments		1	
Cold Storage Facilities		1	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA and Food Standards Agency (FSA) 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 and regional offices. The third part involved on-site visits to two establishments: one swine slaughter/processing establishment and one cold storage facility. The fourth part involved visits to one private laboratory and three government laboratories. The DARD Food Microbiology Food Science Division was conducting analyses of field samples for the presence of *Salmonella*. The DARD Food Services Division, Food Chemistry Analytical Unit and DARD Veterinary Services Division, Chemical Services Department Laboratories were conducting analyses of field samples for Northern Ireland's national residue control program. Generic *Escherichia coli* sampling was being conducted by a private laboratory in Donaghmore, Elite Technical labs, accredited by the United Kingdom Accreditation service (UKAS).

Program effectiveness determinations of Northern Ireland'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 program and a testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. Northern Ireland's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the audit team evaluated the nature, extent and degree to which findings impacted on food safety and public health. The audit team also assessed how meat inspection services are carried out by Northern Ireland and determined if establishment and inspection system controls were in place to ensure the production and distribution of meat products as imports into the United States are safe, unadulterated and properly labeled.

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

Second, in areas not covered by these directives, the audit team 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, requirements for HACCP, SSOP, testing for generic *E. coli* and *Salmonella*, and government oversight/enforcement.

Third, the audit team would audit against any equivalence determinations that have been made by FSIS for Northern Ireland under provisions of the Sanitary/Phytosanitary Agreement. Accordingly, DARD had previously advised FSIS that they have adopted the FSIS regulatory requirements for HACCP and SSOP programs, and generic *E. coli* laboratory testing. DARD is currently utilizing an alternate method (NF 11) for *Salmonella* testing. This method has been submitted to FSIS for equivalence determination, for which a decision is pending.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of U.S. laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).

- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the U.S. import requirements listed in 9 CFR 327 and the Pathogen Reduction/HACCP and SSOP 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

FSIS conducted an audit of Northern Ireland's meat inspection system in July 2003. The following deficiencies were noted:

- In the slaughter establishment, inspection officials were verifying the adequacy and effectiveness of the pre-operational sanitation once a week and operational sanitation twice a week. DARD officials indicated that they would immediately increase their verification frequency.
- The sequence of swine carcass sponging for generic *E. coli* and *Salmonella* sampling was not being followed as required: ham, belly and jowl. Instead, the sequence being used was belly, ham and jowl. Accordingly, FSIS Directive 5000.1, Attachment 1, and 9 CFR 310.25(a)(2)(ii)(c) were not adequately met. This deficiency was the result of a misunderstanding of the *E. coli* and *Salmonella* sample collection requirements due to referencing a different FSIS document. Establishment officials took corrective action immediately.
- Turnaround times of test results for chlorinated hydrocarbons and organophosphates ranged between 25 to 40 days.
- Documentation of corrective actions was provided, but there was very little formal written description of actions to be taken in the event that an analyst's performance did not meet expected standards for chlorinated hydrocarbons, organophosphates and trace elements.
- Northern Ireland had initially advised FSIS that it had adopted the FSIS laboratory testing methods for *Salmonella*. However, DARD had changed the laboratory testing method without submitting it to FSIS for equivalence review. Subsequently, DARD submitted the alternative method to FSIS for equivalence determination.

The FSIS audit of Northern Ireland's meat inspection system conducted in July 2004 revealed no significant deficiencies.

6. MAIN FINDINGS

6.1. Legislation

The audit team was informed that the relevant EC Directives, determined equivalent under the VEA, had been transposed into Northern Ireland's legislation.

6.2. Government Oversight

Northern Ireland's meat inspection system is primarily administered by the Veterinary Service Group, an agency within DARD. In addition, the Northern Ireland meat inspection system is under the auspices of the FSA, an agency within the United Kingdom's parliament, which was established in 2000 to provide food safety oversight for both Great Britain and Northern Ireland.

FSA has an office in Belfast and works closely with DARD.

The responsibility of government oversight relative to meat exports to the United States is shared with two other agencies within DARD with regard to residues and food safety policy. These agencies are the Science Service Group and the Central Policy Group.

The Veterinary Service Group employs approximately 137 veterinarians, 145 meat inspectors and 204 animal health and welfare inspectors to carry out the responsibility of its domestic and export meat inspection programs including related enforcement activities. All inspection personnel assigned to establishments certified to export meat to the United States are full-time government employees receiving no remuneration from either industry or establishment personnel. Inspection personnel cannot attain outside employment.

6.2.1. CCA Control Systems

The Veterinary Service is headed by a Chief Veterinary Officer (CVO) and two Deputy CVOs. Together, with the assistance of several veterinary staff officers assigned to headquarters, they provide direct oversight of two regional offices (North Regional Office and South Regional Office). Relative to meat exports to the United States, each regional office is headed by a supervisory divisional veterinary officer (circuit supervisor), who provides direct authority over official veterinarians and inspectors assigned to establishments certified to export meat to the United States. The Veterinary Service also has authority over live animal matters in Northern Ireland relative to movement controls and livestock diseases.

6.2.2. Ultimate Control and Supervision

The senior Official Veterinary Surgeon (OVS) has the authority to suspend the establishment's production operations any time the wholesomeness and safety of the product is jeopardized. He/she reports directly to their circuit supervisor and consults all decisions regarding enforcement activities. The decision as to whether the establishment is failing to meet U.S. import requirements, and the recommendation that it should be delisted is a combined effort of the OVS, regional supervisor, and headquarters officials. The CVO will make the ultimate decision and will advise FSA authorities.

The senior OVS has direct supervision over all other inspection personnel assigned to certified establishments. This would include supervision over veterinary officers, senior meat inspectors, and meat inspectors. For the two establishments certified to export meat to the United States, the Veterinary Service Group has placed a sufficient number of official inspection personnel to adequately carry out the U.S. import requirements.

6.2.3. Assignment of Competent, Qualified Inspection Personnel

All inspection personnel assigned to certified establishments undergo induction training as well as participate in on-the-job practical training under the supervision of experienced veterinarians. Continual training is provided for all inspection personnel as needed. The Veterinary Service Training Branch maintains individual training records of inspection personnel.

The majority of the meat inspectors have received the meat hygiene inspector's diploma from the Royal College of Veterinary Surgeons. All official veterinarians are qualified veterinarians who have obtained their college veterinary degree.

6.2.4. Authority and Responsibility to Enforce the Laws

Veterinary officers and meat inspectors are authorized to enforce EU legislation and U.S. import requirements including animal health and welfare, control of animal disease, veterinary medicines, and the production of safe foods of animal origin. Through legal process in the courts, DARD, with the assistance of FSA, has the authority to suspend and delist certified establishments to prevent the export of unsafe meat to the United States.

6.2.5. Adequate Administrative and Technical Support

During this audit, the FSIS audit team determined that the CCA has administrative and technical support to operate Northern Ireland's meat inspection system and has resources and the capability to support a third-party audit. DARD demonstrated an adequate amount of supervisory oversight to ensure compliance with U.S. import requirements.

6.3 Headquarters Audit

The audit team conducted a review of Northern Ireland's meat inspection system documents at DARD headquarters in Belfast. In addition, the audit team reviewed meat inspection records at the two DARD regional offices and the three government laboratories. The records' review focused primarily on food safety controls relative to meat exports to the United States. This included the following:

- Internal audit reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Applicable laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues and Salmonella.
- Sanitation, slaughter and processing inspection procedures and standards.
- Export product inspection and control including export certificates.
- Enforcement records including examples of corrective action reports, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export meat products to the United States.

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

6.3.1. Audit of Regional and Local Inspection Sites

The FSIS audit team reviewed Northern Ireland's meat inspection records at DARD's two regional offices; the North Regional Office in Coleraine, and the South Regional Office in Newry. The audit team interviewed the Circuit Supervisor of the North office and the Circuit Supervisor of the South office.

The purpose of the interviews 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 audit team 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 (some electronic) of all relevant regulations, notices, and other inspection documents and records were maintained at the regional offices.
- Both circuit supervisors were knowledgeable of U.S. import requirements relative to the two certified establishments producing or exporting meat to the United States.
- Both regional offices demonstrated adequate administrative assistance to ensure that official inspection personnel were assigned to the two certified establishments.

The FSIS audit team reviewed Northern Ireland's meat inspection records maintained at the local inspection sites certified to produce or export meat to the United States. In addition, the audit team interviewed the senior veterinarians (OVS) at each establishment and their inspection teams, which consisted of veterinary officers, senior meat inspectors and meat inspectors.

The audit team 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 audit team visited a total of two establishments; one was a swine slaughter/processing establishment and the other was a cold storage facility. No establishments were delisted by DARD and no establishments received a Notice of Intent to Delist (NOID) from DARD.

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 U.S. 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 U.S. samples, the audit team evaluated compliance with the criteria established for the use of private laboratories under the PR/HACCP requirements.

The following laboratories were reviewed:

- The DARD Food Science Division, Chemistry Analytical Unit is a government laboratory located in Belfast (Newforge) conducting analyses of field samples for Northern Ireland's national residue program. This laboratory has received ISO Standard 17025 accreditation.
- The DARD Food Science Division, Microbiology Division Unit is a government laboratory located in Belfast (Newforge) conducting analyses of field samples for the presence of *Salmonella*. This laboratory is also ISO Standard 17025 accredited.
- The DARD Veterinary Services Division Laboratory is a government laboratory located in Belfast (Stormont) conducting analyses of field samples for Northern Ireland's national residue program. This facility has received ISO Standard 17025 accreditation for twelve analytical procedures. A further four to six analytical procedures are undergoing an accreditation validation by UKAS in June 2005.
- Elite Technical Labs in Donaghmore, a private laboratory utilized by the certified slaughter to perform testing for generic *E. coli*, for which they have received ISO 17025 accreditation.

With the exception of the microbiology lab at Newforge, all labs are also GLP (Good Laboratory Practices) certified, a European Union (EU) recognized standard based on standard operating procedures which address generic health and safety concerns.

The findings at the DARD Food Chemistry Analytical Unit laboratory and DARD Food Microbiology Food Science Division laboratory will be discussed in Section 12 (Residue Controls). No deficiencies were noted in the DARD Veterinary Services Division Laboratory.

While reviewing the private laboratory (Elite Labs), the audit team noted the following deficiency:

- There was an open screen door at the rear of the facility which raised some concerns, as no further security existed between this entry and the sample storage areas. The accompanying DARD official agreed that additional security measures were needed at this location, and assured that corrective action would be taken in the immediate future.

9. SANITATION CONTROLS

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

Based on the on-site audits of establishments, and except at noted below, Northern Ireland'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.

Northern Ireland'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 in association with these areas.

The following SPS deficiencies were identified by the audit team:

- In both the slaughter establishment and cold storage facility, structural deficiencies were identified which could permit the entrance of rodents or other pests. In the shipping area of the slaughter facility, the bumper cushions around the loading dock bay were badly deteriorated, resulting in an incomplete seal when delivery trucks were backed-up for loading. Approximately two inches of daylight could be seen between the loading bay and the rear of the truck. Similarly, in the loading bay of the cold storage facility, a gap was identified between the floor and door seal. In both instances, DARD officials assured that proper and immediate corrective actions would be implemented.

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. During this process, the following deficiencies were identified:

- A review of the slaughter establishment's SSOP records indicated improper documentation of corrective actions taken in response to contamination of product, or product-contact surfaces. More specifically, in several instances the "disposition of product" was not documented as part of the establishment's corrective actions taken in response to SSOP issues.
- A conveyor belt and cutting board utilized in the processing areas of the slaughter facility were determined to be improperly maintained, as they presented numerous surface irregularities (e.g. cracks, grooves) which rendered these product-contact surfaces difficult to clean.

9.2. EC Directive 64/433

With the exception of the structural and equipment deficiencies mentioned above, the remaining provisions of EC Directive 64/433 were effectively implemented in both establishments.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS audit team 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 audit team determined that Northern Ireland'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. APHIS continues to have import restrictions on beef products from Northern Ireland due to the presence of BSE, and special import restrictions on pork products regarding Rinderpest and Swine Vesicular Disease.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS audit team 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.

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

One of the two establishments certified to export meat products to the United States is required to have adequately developed and implemented a HACCP program. The HACCP program was evaluated according to the criteria employed in the U.S. domestic inspection program.

The HACCP programs were reviewed during the on-site audits of the one establishment and the following deficiency was noted:

- 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*

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

Only one of the two establishments audited was required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* and was evaluated according to the criteria employed in the U.S. domestic inspection program.

Testing for generic *E. coli* was properly conducted in the one establishment (swine slaughter) in which it was required.

11.4 Testing for *Listeria monocytogenes*

Neither of the establishments audited were producing ready-to-eat products for export to the United States and therefore were not required to meet the FSIS requirements for *Listeria monocytogenes* testing.

11.5. EC Directive 64/433

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

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS audit team 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 DARD Food Science Division, Chemistry Analytical Unit is a government laboratory, located in Belfast (Newforge). No deficiencies were noted.

The DARD Veterinary Services Division Laboratory is a government laboratory, located in Belfast (Stormont). No deficiencies were noted.
Northern Ireland's National Residue Control Program for 2004 was being followed as scheduled.

The findings of DARD Food Microbiology Food Science Division laboratory will be discussed in Section 13 (Enforcement Controls).

12.1. EC Directive 96/22

In the DARD Food Chemistry Analytical Unit laboratory and the DARD Veterinary Services Division Laboratory, the provisions of EC Directive 96/22 were effectively implemented.

12.2. EC Directive 96/23

In the DARD Food Chemistry Analytical Unit laboratory and the DARD Veterinary Services Division Laboratory, the provisions of EC Directive 96/23 were effectively implemented.

13. ENFORCEMENT CONTROLS

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

13.1. Daily Inspection in Establishments

Inspection was being conducted daily in both certified establishments.

13.2. Testing for *Salmonella*

Northern Ireland has adopted the FSIS regulatory requirements for testing for *Salmonella* with the exception of the following equivalent measure:

- DARD is currently utilizing an alternate method (NF 11) for *Salmonella* testing. This method has been submitted to FSIS for equivalence determination, for which a decision is pending.

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 U.S. domestic inspection program.

No deficiencies were noted.

13.3. Species Verification

Species verification was being conducted in those establishments in which it was required.

13.4. Monthly Reviews

During this audit, it was found that in all establishments visited, monthly 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 livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other counties for further processing.

The following deficiencies were identified concerning the enforcement of SPS, SSOP, and HACCP requirements:

- In both the slaughter establishment and cold storage facility, structural deficiencies were identified which could permit the entrance of rodents or other pests (SPS).
- The slaughter establishment's SSOP records failed to properly document corrective actions taken in response to contamination of product, or product-contact surfaces. More specifically, in several instances the "disposition of product" was not documented as part of the establishment's corrective actions taken in response to SSOP issues.
- 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.

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 May 19, 2005, in Belfast with the CCA, and by teleconference with a member of the European Community in Brussels, Belgium. At this meeting, the primary findings and conclusions from the audit were presented by the audit team.

The CCA understood and accepted the findings.

Alexander L. Lauro, DVM
Program Auditor

15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Checklists
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 Ltd 70 Molesworth Rd Cookstown BT80 8PJ	May 11, 2005	UK 9052	Northern Ireland
	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.	X
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.	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	
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	
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	X
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est.#: UK 9052
City and Country: Cookstown, Northern Ireland
Date: May 11, 2005

10/56. A conveyor belt and cutting board utilized in the processing areas were determined to be improperly maintained, as they presented numerous surface irregularities (e.g. cracks, grooves) which rendered these product contact surfaces difficult to clean (Directive 64/433/EEC, Annex I, Chapter II (n)) (9 CFR 416.3).

38/51/56. Loading dock: The bumper cushions around the loading dock bay were badly deteriorated, resulting in an incomplete seal when delivery trucks were backed-up for loading. Approximately two inches of daylight could be seen between the loading bay and the rear of the truck, a space through which rodents or other pests could easily enter (Directive 64/433/EEC, Annex I, Chapter II (m)) (9 CFR 416.2(a)).

13/51. A review of the establishment's SSOP records indicated improper documentation of corrective actions taken in response to contamination of product, or product-contact surfaces. More specifically, in several instances the "disposition of product" was not documented as part of the establishment's corrective actions taken in response to SSOP issues (9 CFR 416.16(a)).

15/51. HACCP – CCP#2 (Carcass temperature): 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 (9 CFR 417.2(c)(ii)).

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Alexander L. Lauro	5/11/2005

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
Interfrigo LTD Steeple Industrial Estate, Steeple Road Antrim BT41 1AB	May 12, 2005	UK 9028	Northern Ireland
	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 .	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	X
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	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	X
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Est.#: UK 9028
City and Country: Antrim, Northern Ireland
Date: May 12, 2005

38/51/56. Loading bay: Gap identified between floor and door seal. The size of this gap was large enough to allow potential entry of pests and other rodents from the outside (Directive 64/433/EEC, Annex I, Chapter II (m)) (9 CFR 416.2(a)).

61. NAME OF AUDITOR
Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE
5/12/2005

Department of
Agriculture and
Rural Development
www.dardni.gov.uk

VETERINARY SERVICE

19 October 2005

Sally White
Director
USDA
Food Safety & Inspection Service
Washington DC
20250

Dear Sally

REPORT OF AN AUDIT OF NORTHERN IRELAND'S MEAT INSPECTION SYSTEM CARRIED OUT BY USDA/FSIS OFFICIALS, MAY 2005
COMMENTS MADE BY THE DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT, NORTHERN IRELAND

Thank you for the copy of the draft report of the USDA/FSIS audit carried out on Northern Ireland's meat inspection system from 9-19 May 2005. We welcome this opportunity to comment upon its contents.

With regard to the deficiency noted at the private microbiology laboratory, Elite Laboratories, additional security measures were taken to secure entry to the establishment immediately following the audit visit. For information, Elite Laboratories intend to move to a new facility within the next few weeks.

I can confirm that corrective actions have been taken to effectively seal the loading bays at both the slaughter and cold store establishments in order to prevent the ingress of vermin. The worn conveyer belt and cutting boards in the processing room at the slaughter establishment have been replaced.

The SSOP manual at the slaughter establishment has been amended to ensure appropriate disposition of products that may be contaminated and their HACCP documentation altered to reflect the requirement for a time to be added to temperature as a critical limit for carcase chilling. This has been set at 7°C within 24 hours.

INVESTOR IN PEOPLE
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Tel: 028 90 524669 Fax: 028 90 525012

Finally, could I take this opportunity to remind you that DARD still await a decision from FSIS on the equivalence of the (NF 11) method for salmonella testing.

Yours sincerely

R M HOUSTON
Chief Veterinary Officer