

USDA Findings and Actions Report

VI. APPENDICES

APPENDIX A – USDA Export Verification (EV) Program Specified Product Requirements for Beef- Japan

Issued on December 12, 2005 by the Agricultural Marketing Services, this document provides the specified product requirements for marketing U.S. beef to Japan under the USDA Export Verification (EV) program. It also provides the additional requirements for the USDA Quality System Assessment (QSA) Program for marketing U.S. beef to Japan.

APPENDIX B – EV Program for Japan – Clarification of Specified Product Requirements

Issued on December 30, 2005 by the Agricultural Marketing Service, this document provides clarification on specific areas within a company's Quality System Assessment, Export Verification (QSA/EV) for Japan program.

APPENDIX C – Draft Revised FSIS Directive – Export Certification

The intent of this directive is to clarify current FSIS policy regarding the export certification process.

APPENDIX D – Draft FSIS Notice – Clarification of Export Procedure for Certifying Beef Product for Japan and Certifying Beef Products Under Any Export Verification (EV) Program

The intent of this notice is to provide FSIS inspection program personnel with clarification regarding their verification responsibilities when signing export certification forms for product being exported to Japan.

APPENDIX E – Letterhead Certificate

USDA/FSIS letterhead certifications are issued for certain products when specified in the individual country requirements found in the Export Library. These certifications are prepared in quadruplicate.

APPENDIX F – AMS Statement for Second Signature

The Agricultural Marketing Service will be providing the second USDA signature to confirm that the exporting establishment is an approved establishment and that the specific products listed on the Application for Export Certificate are approved for export to Japan.

APPENDIX G – Training documents for FSIS Inspection Program Personnel

On Monday, Jan. 23, 2006, from 2-4pm, EST FSIS and AMS conducted a netcast meeting with responsible inspection program personnel at all EV approved establishments. This program was an intensive review of export requirements to ensure that the integrity, security and accuracy of requirements is maintained. The agenda as well as the presentations are included.

APPENDIX H – Materials for January 24, 2006 Packer/CEO Participants in Japan Export Verification Program Meeting

USDA held a meeting on Tuesday, January 24, 2006, from 2:30 PM until 5:30 PM for all company Chief Executive Officers and their plant quality assurance directors for plants exporting beef to Japan. USDA's AMS and FSIS collaborated in a comprehensive program to address critical issues for industry compliance with export requirements. Included in this exhibit are materials from the meeting: a memorandum from the Secretary, an agenda and the presentation slides.

APPENDIX I – Documents relating to FSIS investigation of Golden Veal Corp. & Atlantic Veal and Lamb, Inc.

Upon notification of the ineligible product shipped to Japan, FSIS immediately began an investigation in cooperation with the USDA Office of the Inspector General (OIG) at the exporting establishment. In addition, FSIS' Office of Program Evaluation, Enforcement and Review began an investigation at this plant Friday morning, January 20, 2006, of plant and FSIS inspection program personnel involved. This exhibit includes various documents relating to the investigation.



USDA Export Verification (EV) Program Specified Product Requirements for Beef - Japan

1 Purpose

This document provides the specified product requirements for marketing U.S. beef to Japan under the USDA Export Verification (EV) Program. It also provides the additional requirements for the USDA Quality System Assessment (QSA) Program for marketing U.S. beef to Japan.

2 Scope

This document applies to U.S. companies, producers, feedlots, slaughterers, fabricators (*fabricators perform the initial separation, or cutting of carcasses into wholesale cuts*) that supply beef and beef offal that are eligible for export to Japan as listed on the Food Safety and Inspection Service (FSIS) website. Companies must meet the specified product requirements for Japan under the EV Program through an approved QSA Program. The requirements for the QSA Program are defined in *ARC 1002 Procedure, Quality System Assessment (QSA) Program*. The QSA Program ensures that the specified product requirements are supported by a documented quality management system.

Only companies with an approved QSA Program for the EV Program for Japan may label and sell product as meeting the specified product requirements for Japan under the EV Program.

3 Reference Documents

ARC 1000 Procedure, Quality Systems Verification Programs General Policies and Procedures

ARC 1002 Procedure, Quality System Assessment (QSA) Program

*MGC Instruction 709 Physiological Maturity Evaluation of Beef Carcasses for Japan Export Program
Physiological Maturity Determination Guidelines - Appendix F*

*U.S. Standards for Grades of Carcass Beef - <http://www.ams.usda.gov/lsg/stand/standards/beef-car.pdf>
[http://www.fsis.usda.gov/regulations & policies/Index of Import Requirements by Country/index.asp](http://www.fsis.usda.gov/regulations_%20policies/Index_of_Import_Requirements_by_Country/index.asp)
<http://www.ams.usda.gov/lsg/arc/evjapan.htm>*

4 Additions to the USDA Quality System Assessment (QSA) Program Requirements

The specified product requirements listed in Section 5 of this Procedure must be met through an approved QSA Program. The QSA Program ensures that the specified product requirements are supported by a documented quality management system. In addition to the requirements listed in *ARC 1002 Procedure, Section 7, Program Requirements*, companies must also incorporate the following requirements into their QSA Program:

"The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of color, race, national origin, gender, religion, age, disability, sexual orientation, marital or family status, political beliefs, parental status, or protected genetic information. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at 202-720-2600 (voice and TDD). To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 14th and Independence Avenue, SW., Washington, DC 20250-9410 or call 202-720-5964 (voice and TDD). USDA is an equal opportunity provider and employer."



4.1 ***Internal Audit***

The company must conduct internal audits at planned intervals.

The internal audits must determine whether the QMS

- a) Conforms to the planned arrangements, to the requirements of this Procedure, and to the QMS requirements established by the company; and
- b) Is effectively implemented and maintained.

The company must have a documented procedure which defines

- a) The planning of an audit program, which must consider the status and importance of the processes and areas to be audited, as well as the results of the previous audit;
- b) The audit criteria, scope, frequency, and methods;
- c) The selection criteria of the auditors and conduct of auditors which must ensure objectivity and impartiality of the audit process (Auditors must not audit their own work.);
- d) The responsibilities for planning and conducting audits;
- e) The reporting of results;
- f) The follow-up activities (Follow-up activities must include the verification of the actions taken and the reporting of the verification results.); and
- g) The maintenance of records.

Within the area being audited, management must ensure that actions are taken without undue delay to eliminate detected non-conformances and their causes.

The company must maintain records of the internal audits.

4.2 ***Company's Suppliers Listing***

The company must maintain an approved suppliers listing which must

- a) Identify the supplier's name, address, and approval date; and
- b) Be available to the USDA for review.

The company must also maintain the date that suppliers were removed from the suppliers listing.

5 Specified Product Requirements

5.1 Beef and beef offal that are eligible for export to Japan as listed on the Food Safety and Inspection Service (FSIS) website must be processed using the procedures as incorporated into the facility's HACCP or Sanitation SOP's, and must be produced in a manner that ensures the hygienic removal of the following materials and prevents the contamination of these tissues with meat products being produced for export to Japan:

- 5.1.1 Bovine heads (except for hygienically removed tongues and cheek meat, but including tonsils); spinal cords; distal ileum (two meters from connection to caecum); and vertebral column (excluding the transverse processes of the thoracic and lumbar vertebrae, the wings of the sacrum, and the vertebrae of the tail).



5.2 Eligible products must be derived from cattle that are 20 months of age or younger at the time of slaughter using either one of the following methods (5.2.1 or 5.2.2):

5.2.1 Cattle must be traceable to live animal production records. Verification activities for age requirements must be conducted at the slaughter, feedlot, and producer levels as required by the submitted QSA Program. Records used to verify this requirement must meet any one of the following criteria (5.2.1.1. to 5.2.1.3):

5.2.1.1 Individual Animal Age Verification

5.2.1.1.1 Animals must have a unique individual identification.

5.2.1.1.2 Records must be sufficient to trace the individual animal back to ranch records.

5.2.1.1.3 Records must indicate the actual date of birth of the animal and must accompany each animal through the process.

5.2.1.2 Group Age Verification

5.2.1.2.1 All animals within a group and born during the same birthing season must be individually identified.

5.2.1.2.2 Records must indicate the actual date of birth of the first calf of the birthing season.

5.2.1.2.3 The age of all calves within a group must be *derived from* the actual date of birth of the first calf born within the group.

5.2.1.2.4 Records indicating the date the bulls are given access to the cows may be used as a supplementary measure verifying the oldest age of animals in the group which is determined in 5.2.1.2.2.

5.2.1.3 USDA Process Verified and USDA Quality System Assessment Programs.

5.2.1.3.1 The USDA Process Verified Program must include age verification as a process verified point as defined in 5.2.1.1 and 5.2.1.2.

5.2.1.3.2 The USDA Quality System Assessment Program for feedlots and producers must include age verification as a specified product requirement as defined in 5.2.1.1 and 5.2.1.2.

5.2.1.3.3 All animals must be individually identified.

5.2.2 Age Verification through Carcass Evaluation.

Official USDA evaluation at the slaughter facility must be conducted as required by the submitted QSA program and meet each of the following criteria (5.2.2.1, 5.2.2.2, and 5.2.2.3):



- 5.2.2.1 Cattle must be determined to be A⁴⁰ physiological maturity or younger by an official USDA evaluation Official USDA evaluations must determine carcasses to be A⁴⁰ physiological maturity or younger using the U.S. Standards for Carcass Beef <http://www.ams.usda.gov/lsg/stand/standards/beef-car.pdf> and the description of maturity characteristics within A maturity (Physiological Maturity Determination Guidelines Appendix F).
- 5.2.2.2 USDA Evaluators must meet or exceed accreditation performance standards for determining physiological maturity as outlined in Meat Grading and Certification Branch Instruction 709 in order to ensure the accuracy of the evaluation.
- 5.2.2.3 USDA Evaluators must keep records for each of the determining factors (skeletal, lean, and overall maturity) for each carcass which is determined to be A⁴⁰ or younger for exportation to Japan.

5.3 Identification Requirements –

- 5.3.1 All carcasses complying with 5.2.1 and 5.2.2 must be uniquely identified. Carcasses complying with the “Age Verification through Carcass Evaluation” must be marked once evaluated and approved by proficiency-tested USDA Evaluators. These identification marks must remain with the product through processing, packaging, storage, and shipping to insure the integrity of the process and the product.
- 5.3.2 Shipping documentation (bills of lading, shipping manifests, or letters of guarantee) must have the statement “Product Meets EV Program Requirements for Japan” and must clearly identify the product and product quantity.
- 5.3.3 Eligible products produced by eligible companies and identified as meeting the requirements of the EV Program for Japan shall receive a FSIS export certificate with the statement “Product Meets EV Program Requirements for Japan”.

6 Listing of Approved Programs

Only U.S. companies that have an approved USDA QSA Program which meets the specified product requirements for Japan will be listed on the *Official Listing of Eligible Companies for the Export Verification (EV) Program for Japan*.

7 Responsibilities

U.S. companies must meet all policies and procedures outlined in this Procedure, *ARC 1000 Procedure, Quality Systems Verification Program General Policies and Procedures*, and *ARC 1002 Procedure, Quality System Assessment (QSA) Program*.



EV Program for Japan – Clarification of Specified Product Requirements

December 30, 2005

Within all quality management systems opportunities for continuous improvement exist and when identified must be address with corrective action. During the recent plant reviews conducted by the joint Government of Japan and USDA audit teams; AMS was provided with specific areas that require immediate corrective action. Please review the following issues and revise your Quality System Assessment, Export Verification (QSA/EV) for Japan program to address the following areas, as necessary.

1. QSA/EV for Japan Program Manuals

Plants must provide FSIS official's access to their approved QSA/EV Program for Japan manual. The manual may be provided in either electronic or a hard copy format. If the manual is maintained as a hard copy document, the plant must provide one copy to the FSIS official within the plant and maintain at least three controlled copies throughout the plant.

2. Canadian Cattle

Plants that harvest age-verified Canadian cattle destined for use in their QSA/EV for Japan program must maintain an "approved suppliers listing". The approved suppliers listing must include the names and addresses of suppliers from cattle received from producers approved to supply cattle through the plants QSA/EV for Japan program as well as the names and addresses of suppliers of Canadian cattle with CFIA verified birth dates.

3. Removal of SRM's

Removal of the spinal cord must be conducted prior to the final FSIS inspection station.

Vertebral columns from carcasses of cattle 20 months of age or younger must be removed during fabrication of product destined for Japan. The removal of the vertebral columns must be conducted in the same manner as the plant's current documented procedures for removal of the vertebral columns from carcasses of cattle 30 months of age and older. Plants must include this procedure in their QSA/EV for Japan program.

4. Carcasses from Cattle 30 months of age or older

Carcasses from cattle aged 30 months or older must be segregated from carcasses destined for the QSA/EV for Japan program throughout slaughter and fabrication.

5. Offal – Hygienically removed of cheek meat

If a plant is saves cheek meat for export to Japan, the cheek meat must be removed from the head separate from other head meat and tissues. The cheek meat must not be commingled with head meat and tissues at any time.

FSIS DIRECTIVE

DRAFT

9000.1,
Revision 1

2/8/06
4:14 pm

EXPORT CERTIFICATION

I. PURPOSE

The export certification process serves to instill confidence in United States (U.S.) meat and poultry products throughout the world; therefore, FSIS must continue to ensure a high level of integrity, security and accuracy within the process. This directive provides a clear set of standards for District Offices (DO) and inspection program employees to follow. This directive clarifies the process if an FSIS certifying official feels that he or she is unable to sign an export certificate, makes clear that a facsimile of FSIS form 9060-6 may be used to provide the information requested in that form, clarifies the purpose of the Export Library, and clarifies other aspects of the directive.

II. CANCELLATION

FSIS Directive 9000.1

III. REASON FOR REISSUANCE

FSIS is reissuing this directive in its entirety to clarify Agency policy regarding the export certification process.

IV. REFERENCES

9 CFR 156, 307.4(c), 312.8, 316.5, 317.1, 317.7, 318.2, 322.1, 322.2, 322.4, 325.8, 325.13, 350, 351, 354, 355, 362, 381.37(c), 381.66, 381.104, 381.105-107, 381.128, 381.193

FSIS Directives 5110.1 revision 1, 9040.1 revision 2

V. BACKGROUND

A. As specified in FSIS regulations, upon application by an exporter (applicant), an FSIS inspection program employee is authorized to issue official export certificates for the shipment of inspected and passed products to any foreign country. The applicant provides a completed FSIS Form 9060-6 (Application for Export Certificate) to an inspection program employee. An inspection program

employee may sign the application and issue, (but not sign), an export certificate and export stamp, only after he or she has:

1. verified that the information on the application is correct;
2. verified that the country requirements as specified in the Export Library have been met, and
3. re-inspected the product as set out in FSIS Directive 9040.1, Revision 3, and has no reason to conclude that the product has become adulterated or unwholesome, or the product is mislabeled or ineligible for export to the country listed on the application.

The inspection program employee should request from the exporter any documentation needed.

B. After receiving a completed export certificate from an exporter, an FSIS certifying official (inspection program employee that signs the certificate) verifies the information by comparing the information on the certificate to the information on the certified (signed) application. The statement on the export certificate is a certification that may be based on information provided to the certifying official, and he or she need not have been directly associated with the inspection of the product. If further clarification is needed, the certifying official will request additional information or documentation from the inspection program employee who signed the application or from the exporter. Once the certifying official is assured that all information is accurate, he or she is to sign the export certificate. If a certifying official refuses to sign a certificate, he or she should have good and sufficient reasons (e.g., the documents are incomplete, or he or she cannot verify, based on the information provided, that the product meets the export requirements). The certifying official should document the reasons for his or her refusal to sign.

C. If a certifying official refuses to sign a certificate, his or her refusal and the reasons for doing so will be reviewed by the Front-line Supervisor. Based on the review, the Front-line Supervisor will take one of the following actions:

1. Uphold the refusal of the certifying official to sign the export certificate on the grounds that the information presented by the exporter is not adequate to justify signing the certificate; or
2. Decide, based on his or her review of the record, that the signature is justified and sign the certificate. If a PHV signature is required, the Front-line Supervisor would forward to the appropriate district office personnel the findings with a recommendation that certificate be signed.

D. If the Front-line Supervisor signs the export certificate and determines that the certifying official's refusal to sign the export certificate was not based on good and sufficient reasons as outlined in Section B above (e.g., the documents are incomplete, or he or she cannot verify requirements), the Front-line Supervisor documents the incident and forwards a report to the District Office. The District Office will review the information from the Front-line Supervisor and make a decision whether or not to forward the information to the Labor and Employee Relations Division, Employee Relations Branch, for determination of appropriate administrative action, including disciplinary or adverse action.

VI. EXPORT LIBRARY

A. The Export Library contains the requirements that have been officially communicated to FSIS by the country to which the product is to be exported. It should be used to determine the eligibility of shipments for export and includes information such as:

1. certificate requirements
2. eligible and ineligible products
3. facility requirements
4. labeling requirements
5. edible and inedible products
6. plant requirements to become eligible to export
7. PHV signature requirements, if any
8. animal health requirements
9. list of plants eligible to export
10. export notices

B. Ways to access information from the Export Library:

1. on the internet at:

[www.fsis.usda.gov/Regulations & Policies/Export Information/index.asp](http://www.fsis.usda.gov/Regulations%20&%20Policies/Export%20Information/index.asp)

2. Outlook

3. Call the FSIS Technical Service Center (TSC) at 1-800-233-3935 or 402-221-7400

4. For information regarding animal health status and certification:

a. consult the Export Library

b. consult the TSC at the above numbers

c. after consulting the Export Library and the TSC, if specific questions remain regarding the status of a particular disease within a State, consult the Animal Plant Health Inspection Service (APHIS) Area Veterinarian in Charge (AVIC) for that State. A list of AVIC's is available on the APHIS website at:

http://www.aphis.usda.gov/vs/area_offices.htm

VII. APPLICATION FOR EXPORT CERTIFICATE

A. Upon receiving an application for export, an inspection program employee reviews the application to verify that it is complete, and that all pertinent information is included.

B. An inspection program employee reviews the application to verify that the requirements of the receiving country have been met. The inspection program employee verifies statements on the application by requesting appropriate documentation from the applicant. The inspection program employee should inform the applicant that the process may be expedited if he or she provides the necessary documents, for example Export Verification records, along with the application.

1. If inspection program employee has concerns as to whether each product listed on the application is eligible for export to the country listed on the application, he or she is to:

a. raise such concerns with applicant;

b. document a memorandum of interview addressing what was discussed and whether the concerns were adequately addressed; and

c. provide a copy of the memorandum to the applicant and maintain a copy in the inspection files.

C. An inspection program employee performs a sensory evaluation of the product to determine its eligibility for export. The inspection program employee should be particularly alert for signs that product is or may become adulterated or unwholesome

(e.g. off-condition odor, torn damp cartons, or other evidence of insanitary handling or storage).

1. If the inspection program employee finds signs of poor product handling and storage he or she may examine the product as set out in FSIS Directive 9040.1, Rev. 3, Re-inspection of Product Intended for Export) and take any necessary actions when the product may be adulterated as provided in FSIS Directive 5000.1 (at official establishments (e.g., regulatory control actions and issuance of Non-Compliance Records) or FSIS Directive 8410.1 (at non-official establishments (e.g., detaining products)).

2. Also, if an inspection program employee has reason to question whether the products are properly identified and labeled to meet FSIS regulatory requirements and the requirements of the importing country, they may examine the product as set out in FSIS 9040.1, Revision 3, and:

a. take any necessary control actions when the product is not properly labeled or misbranded as provided in 9 CFR part 500 (at official establishments) or FSIS Directive 8410.1 (at non-official establishments); or

b. raise the concern with the applicant and prepare a memorandum of interview as described in paragraph VII B 1 b. and c. above when the product in the container or the labeling of the product does not meet the requirements of the importing country.

D. An inspection program employee verifies that the foreign language sticker, if required, shows no wording other than that shown on the approved label.

NOTE: The inspection program employee also verifies that any required letter of guarantee from the exporter supplying the foreign language sticker, which certifies that the sticker is an accurate translation of the wording on the approved label, is included.

E. After the inspection program employee completes A through D above and everything is acceptable, he or she:

1. signs the application;
2. retains a copy of the application and any accompanying documents for filing;
3. returns the originals to the applicant;
4. provides the export certificate for completion by the exporter and issues the export stamp;
5. permits the establishment to stamp product; and

6. secures the stamp after the establishment finishes stamping the product.

F. An inspection program employee may permit an establishment to stamp boxes and complete the export certificate when he or she is not present (pre-stamp). However, the establishment should have procedures to ensure the stamp will be applied in a clear and legible manner only to boxes that are in sound condition. An inspection program employee performs re-inspection as specified in paragraph VII. C. at any time he or she determines that it is necessary.

NOTE: An inspection program employee may allow an establishment to use a computer generated export stamp (sticker) as long as the establishment identifies the number of stickers produced before applying them to product and provides the inspection program employee with any unused stickers.

G. On the day inspection program personnel perform the procedures above; they are to record Inspection System Procedure code 06A01 as performed. Inspection program personnel only record the procedure as performed once in a day and not for each application received.

IX. EXPORT CERTIFICATES

A. The certifying official receives the appropriate completed export certificate and a copy of the signed application from the exporter. The certifying official verifies that the information on the certificate is consistent with the information on the application by reviewing any attached documentation or checking in the export library. If the certifying official has questions about the information on the application or the certificate, he or she does not sign the certificate until he or she has contacted the inspection program employee who signed the application, the exporter, or the Technical Service Center to address and has addressed all concerns.

B. Before signing the certificate, the certifying official:

1. checks the certificate for accuracy and corrections;
2. checks for attachments and ensures that the exporting firm has lined-out any unused space; and
3. initials minor erasures or alterations, unless this is not acceptable to a foreign country, (see Export Library to verify if receiving country permits erasures or alterations).

C. If needed, a continuation sheet is prepared by the exporter when multiple items in the shipment exceed the space available on the face of the certificate. The continuation sheet is to be prepared in quadruplicate and includes:

1. Date issued;
2. Title, e.g., Continuation Sheet for Export Certificate # _____;
3. Product description – name, boxes, weight, as indicated on the face of the certificate; and
4. The certifying official's name and signature followed by the district number. The name and code number must be the same as that on the face of the certificate.

D. The certifying official signs the certificate only when assured that all the preconditions for signature set out in this directive have been met. He or she signs the original certificate in the signature block in **other than** black ink, and signs all supplemental certifications e.g., special statements required by a specific country, and all continuation sheets. Also, if the importing country requires a PHV's signature, the certifying official is to include his or her professional degree. The certifying official should not stamp the certificate with the export stamp unless required by a receiving country as specified in the Export Library. Need to indicate they check the box on received ante-mortem and post-mortem.

X. REPLACEMENT CERTIFICATES

A. A certificate replacing an original certificate is a re-certification of the product's condition **at the time of the initial export certification**. A replacement certificate for a lot **does not** represent that lot's current condition. A replacement certificate may be issued in situations such as, but not limited to:

1. The original certificate did not carry required information.
2. The original certificate carried incorrect information.
3. The name of the consignee or exporter has changed.
4. The certificate has been lost.

B. The replacement certificate must be dated with the same date as that shown on the original certificate.

C. A request to increase the box count or the total net weight shall not be honored unless the product is re-inspected in accordance with paragraph VII. C. of this directive.

D. An application (FSIS Form 9060-6) is submitted to request a new certificate and must be accompanied by (if possible) the original and all copies of the original

certificate. Exception: In the case of lost certificates, the exporter should provide a letter of assurance to the certifying official stating the certificate will be returned if found.

E. Multiple export certificates may be issued to replace an original if the exported product has been subdivided for shipping to more than one consignee, and an export certificate is required for each part, provided that:

1. The lot was originally manifested in sufficient detail to enable the direct correlation of containers, identification, and corresponding weights on the new certificate.
2. The original certificate is returned for cancellation.

F. Before signing a replacement certificate, an inspection program employee:

1. Verifies that the following statement is in the top left margin or in the remarks block of the new certificate: "Issued in lieu of certificate no. _____. The export mark on the product covered by this certificate shows certificate no. _____."

2. Obtains the superseded certificate (if possible), and:

- (a) verifies that it is marked in the left margin or in the "Remarks" block with the number of the certificate which supersedes it, e.g., "Superseded by No. _____," and

- (b) attaches it to the "inspector's" copy of the replacement certificate and files it in the government office.

XI. USDA/FSIS LETTERHEAD CERTIFICATION

USDA/FSIS letterhead certifications are issued for certain products when specified in the individual country requirements found in the Export Library. These certifications are prepared in quadruplicate and must include:

- A. Date issued;
- B. Corresponding certificate number;
- C. Establishment/plant number;
- D. Name and address of consignor;
- E. Name and address of consignee;
- F. Certification statement e.g., I (name of inspector/veterinarian) certify...;
- G. Specific shipment information as specified in the Export Library;

H. Inspector/veterinarian name typed/printed, followed by professional degree, if applicable, and the District number; and

I. Signature of inspector/veterinarian exactly as typed/printed.

XII. INVENTORY

A. Official export stamps must be controlled at all times. Export certificates, stamps, and pertinent inventory records must be maintained under official lock or seal when not in use. The following forms are considered to be accountable:

1. MP-415-4 , Animal Casings Export Certificate
2. FSIS Form 9060-5, Meat and Poultry Export Certificate of Wholesomeness
3. FSIS-9060-7, Animal Casings Export Certificate for Countries Requiring Ante-Mortem, Post-Mortem and Fit for Human Food Statement
4. FSIS 9060-9, Inedible Product Export Certificate
5. FSIS-9060-10, Horse Meat or Horse Product Export Certificate
6. FSIS-9060-17, Animal Casings Export Certificate for Countries Requiring Ante-Mortem, Post-Mortem and Fit for Human Food Statement (For Casings Processed in Mexico)
7. FSIS-9060-18, Animal Casings Export Certificate for Countries Requiring Ante-Mortem, Post-Mortem and Sound and Clean Statement
8. FSIS 9135-3, Certificate for Export of Meat and Poultry (Canada)

B. The inspection program employee at each establishment must maintain an accurate inventory record of export certificates issued, and voided certificates.

Deputy Administrator
Office of Policy, Program, and Employee Development

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE

DRAFT

2/9/06
4:45 pm

CERTIFYING BEEF PRODUCTS UNDER EXPORT VERIFICATION (EV) PROGRAMS

I. PURPOSE

This notice provides FSIS personnel with new instructions related to the FSIS certification process for beef product exported under EV programs. This notice announces that when FSIS personnel certify products for export produced under EV programs, they are to verify that the applicant provides a signed document from the Agricultural Marketing Service (AMS) confirming that each EV requirement has been met by the establishment or establishments that produced the product being presented for export.

II. BACKGROUND

The Audit, Review, and Compliance Branch of the AMS has been assigned responsibility for reviewing and approving companies as eligible suppliers of meat and meat products under the USDA Export Verification (EV) programs. The EV programs outline the specified product requirements for individual countries. See the web page link below for additional information.

<http://www.ams.usda.gov/lsg/arc/BEV.htm>

III. VERIFICATION PROCEDURES FOR EV PROGRAMS

A. Off-line FSIS inspection program personnel should ascertain (e.g., by asking the establishment at the weekly HACCP meeting) whether the establishment is participating in an EV program. Inspection personnel should be aware of the location and contents of the approved plant EV program in order to determine whether the plant is properly executing their program. Inspection personnel also should ask for and review a copy of the EV audit form.

DISTRIBUTION:

NOTICE EXPIRES:

OPI:

B. If, based on their verification activities, inspection program personnel develop concerns that an AMS-approved EV establishment is not properly executing its EV program (e.g., attempting to ship product with vertebra column portions that are not excluded), they are not to sign export applications for the product in question.

C. If inspection program personnel find a problem with the establishment's execution of its EV program, they are to notify AMS at ARCBranch@usda.gov and send a courtesy copy of the notification to their immediate FSIS supervisor, and maintain a copy of the message on file. Inspection program personnel are to include the following information in the message:

1. establishment name, address, and number;
2. product type, product code, and quantity of product;
3. date of production, lot number, and shift;
4. date and nature of observation;
5. name of country for which product is intended;
6. export certificate number (if applicable);
7. any other information to verify claim; and
8. name of inspection official.

NOTE: If any of the problems with the EV requirements also are regulatory non-compliance situations, inspection program personnel are to take the appropriate enforcement actions and issue a Non-compliance Record (NR).

IV. VERIFICATION PROCEDURES FOR EXPORTED PRODUCT UNDER EV PROGRAMS

A. Upon receiving FSIS Form 9060-6, Application for Export Certificate, inspection program personnel are to verify that (following the procedures in FSIS Directive 9000.1):

1. the establishment is on the AMS EV list as approved to export to the importing country, and that the product was derived from cattle slaughtered after the date the establishment received AMS approval to export the product to that country (see link above for the date of approval);
2. each of the products listed on the application is eligible for export to the country under the EV program (see link above for list of products); and
3. the plant management has:
 - a. certified on the application that the product meets EV program requirements for the country to which the product is to be exported;

b. provided the specific consignment details, including product identification information, production date, number of boxes, and the manufacturer;

c. provided a signed document from the Agricultural Marketing Service (AMS) that confirms that:

i. the establishment that produced product listed on the application has met each EV requirement under that EV program; and

ii. that product purchased or received from outside establishments and used in the EV program conforms to specified product and receiving requirements, and were produced under EV supplier requirements;

iii. provided necessary supporting records to demonstrate that each EV requirement has been met by the establishment.

C. After determining that the establishment itself is eligible to export to the destination country (under IV.A1 above), that the specific products are eligible (under IV.A2 above), and that the application contains the confirmation from AMS (under IV. A3 above), the inspection program personnel will then re-inspect the product as set out in FSIS Directives 9000.1, Revision 1, and 9040.1, Revision 3.

D. If the application or product is not acceptable (e.g., the application is not complete or regulatory requirements have not been met), inspection program personnel are not to sign the application and are to follow the instructions as set out in FSIS Directives 9000.1, Revision 1, and 9040.1, Revision 3.

NOTE: If the application or product is not acceptable because an EV requirement has not been met, inspection program personnel, in addition to returning the application unsigned, are to document, contact AMS, and maintain copies as set out in paragraph III C above.

E. If the application and product are acceptable, inspection program personnel are to follow the instructions in FSIS Directive 9000.1, Revision 1 regarding signing the application and issuing FSIS Form 9060-5, Meat and Poultry Products Export Certification of Wholesomeness.

F. When FSIS employees (e.g., Public Health Veterinarians) who are to sign and issue an Export Certification, FSIS Form 9060-5, Meat and Poultry Products Export Certification of Wholesomeness, receive a signed application, they are to review the application, the AMS confirmation, and other relevant forms or documents to verify that the documents are complete and accurate, and that the products listed on the Export Certificate are eligible for export to the country listed on the certificate.

1. If any of the documents are not accurate,

- i. notify the responsible person and explain the problem;
- ii. document a memorandum to the responsible person; and

iii. maintain copies of the package and the written explanation[

NOTE: If the application or product is not acceptable because an EV requirement has not been met, document, contact AMS, and maintain copies as set out in paragraph III C above; and

2. If all documents are acceptable, sign the Certification.

Direct questions to the Technical Service Center at 1-800-233-3935.

Assistant Administrator
Office of Policy, Program, and Employee Development



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

Letterhead Certificate for Export of Beef and Beef Offal to Japan

Date Issued: _____ Certificate Number: _____

1. Cattle slaughtered for the production of the exported beef to Japan (hereinafter referred to as “the slaughtered cattle”) have been born and raised only in the USA, or legally imported from Canada, or legally imported from the third free countries listed here and raised in the USA. Third free countries are: Norway, Hungary, Iceland, Mexico, Belize, Guatemala, Honduras, El Salvador, Nicaragua, Costa Rica, Panama, Dominican Republic, Chile, Commonwealth of the Northern Mariana Islands, New Zealand, Vanuatu, New Caledonia, Australia
2. The slaughtered cattle were not suspect or confirmed BSE cases, or confirmed or suspected progenies, or cohorts of BSE cases, as defined in the Terrestrial Animal Health Code adopted by the World Organization for Animal Health (OIE).
3. The slaughtered cattle were found to be sound and healthy as a result of ante- and post-mortem inspections conducted by USDA veterinary inspectors in the designated facilities at the time of slaughter.
4. The exported beef to Japan fulfilled all of the required conditions described in the EV Program. In case the slaughtered cattle have been legally imported from Canada, criteria 5.2.1.1 or 5.2.1.2 of the EV program is applied in order to verify 20 months of age or younger. In case the slaughter cattle have been legally imported from the third free countries listed above other than Mexico and raised in the USA, only criteria 5.2.1.1 of the EV Program is applied in order to verify 20 months of age or younger.
5. The exported beef to Japan has been handled at the designated facilities in such a way as to prevent contamination with any causative agents of animal infectious diseases until shipment to Japan.

Signature of FSIS Inspection Official: _____

Printed Name: _____

Title/Professional Degree: _____



Agricultural
Marketing
Service

Livestock
and Seed
Program

Audit, Review,
and Compliance
Branch

100 Riverside Parkway
Suite 135
Fredericksburg, VA 22406

USDA Export Verification (EV) Program for Japan Agricultural Marketing Service (AMS)

AMS has conducted a review of the establishments and product items listed on the following FSIS Certificate.

FSIS Certificate Number

FSIS Establishment Number(s)

AMS has approved the establishments listed on this FSIS Export Certificate under the EV Program for Japan. AMS has reviewed the list of product items on this FSIS Export Certificate and has verified that the items listed are eligible items approved for export to Japan from the establishments listed.

These establishments meet the *ARC 1030J Specified Product Requirements for Japan* through an approved USDA Quality System Assessment (QSA) Program. The USDA QSA Program ensures that the specified product requirements are supported by a documented quality management system and that product is identified and traceable through the system.

AMS attests to the following:

The exported beef to Japan fulfilled all the required conditions described in the EV Program. In case the slaughtered cattle have been legally imported from Canada, criteria 5.2.1.1 or 5.2.1.2 of the EV program is applied in order to verify 20 months of age or younger. In case the slaughter cattle have been legally imported from third free countries other than Mexico and raised in the USA, only criteria 5.2.1.1 of the EV Program is applied in order to verify 20 months of age or younger.



Date:	February 08, 2006
Verified by:	James L. Riva
Signature:	

NOTE: *This document must be attached to the original FSIS Export Certificate prior to being presented to FSIS for final signature.*

AMS

Export Verification Program – Beef

Quality System Assessment (QSA) Program Requirements

AMS Beef Export Verification (EV) Program

Livestock and Seed Program

AMS

Export Verification Program – Beef

**QSA – the audit method, includes
the Quality Management
Requirements**

**EV – the Specific Product
Requirements- Age, SRM
Removal, Dedicated total**

Quality System Assessment Program

- This Procedure provides the requirements of a USDA Quality System Assessment (QSA) Program. ARC 1002 Procedure
- It also provides the criteria used in the objective evaluation of USDA QSA Programs that are submitted for approval.

QSA Purpose

- Audits are conducted by the Agricultural Marketing Service (AMS), Livestock and Seed (LS) Program, Audit, Review, and Compliance (ARC) Branch
- QSA audits are of the processes in place along with a review of product specifications

QSA References

- *ARC 1000 Procedure, Quality Systems Verification Programs General Policies and Procedures*
- *ARC 1002 Procedure, USDA Quality System Assessment (QSA) Program*
- *ARC 1030J Procedure EV Program for Japan*

QSA Internet Listing

- Approved programs will be listed on the applicable Program website or on the USDA QSA Program website at <http://www.ams.usda.gov/lsg/arc/bev.htm>

QSA Program Requirements

- Companies must submit a documented program that addresses the QSA program requirements as outlined in clauses (Clauses 1 to 5). This would include activities at associated locations

QSA Program Requirements ARC 1002

1. Quality Management Systems
2. Management Responsibility
3. Human Resources - Competence, Awareness, and Training
4. Product Realization
5. Measurement, Analysis, and Improvement

QSA - Product Realization Identification and Traceability

- The company must have a documented procedure to identify product (raw materials and/or finished product) by suitable means throughout product realization, where appropriate. Usually a specific product code

QSA - Product Realization Identification and Traceability

The company must maintain records of all products as identified and records of all changes of identities.

QSA - Product Realization - Control of Monitoring and Measuring Activities

- The company must determine the monitoring and measurement to be undertaken to provide evidence of conformity to specified product requirements.

QSA - Measurement, Analysis, and Improvement

Monitoring and Measurement of Processes

- These methods must demonstrate the ability of the processes to meet product requirements.

QSA - Measurement, Analysis, and Improvement

Monitoring and Measurement of Processes

- When product requirements are not achieved, correction and corrective action must be taken, as appropriate, to ensure conformity of the product.

QSA - Measurement, Analysis, and Improvement

Monitoring and Measurement of Product

- The company must maintain records to verify evidence of conformity to product requirements. Records must indicate the person (s) authorizing release of product.

QSA - Measurement, Analysis, and Improvement

Control of Non-conforming Product within the QMS

- The company must ensure that non-conforming product (raw material and/or finished product) is identified and controlled to prevent its unintended use or delivery.

QSA - Definitions

Specified Product Requirements – the requirements listed within the applicable Program Procedure or as stated by the company. Example:

ARC 1030J Procedure, USDA Export Verification Program – Beef for Japan

QSA Approval Process - BEV

Approval Process

- Review submitted documentation from all facilities
- New slaughter or processing facility -
Conduct onsite audit

ARC 1030J Specified Product Requirements

- USDA will verify the control program of each facility managed by a HACCP (Hazard Analysis Critical Control Point) or SSOP (Sanitation Standard Operating Procedures).

ARC 1030J Specified Product Requirements

- Beef items including offal and variety meats must be derived from bovine animals verified to be 20 months of age or younger.

ARC 1030J Specified Product Requirements

- Specified risk materials (SRMs) must be removed from animals of all ages
- SRMs – spinal cords, distal ileum (two meters from connection to caecum), **vertebral column** (excluding the transverse processes of the thoracic and lumbar vertebrae, the wings of the sacrum and vertebrae of the tail) of all ages.

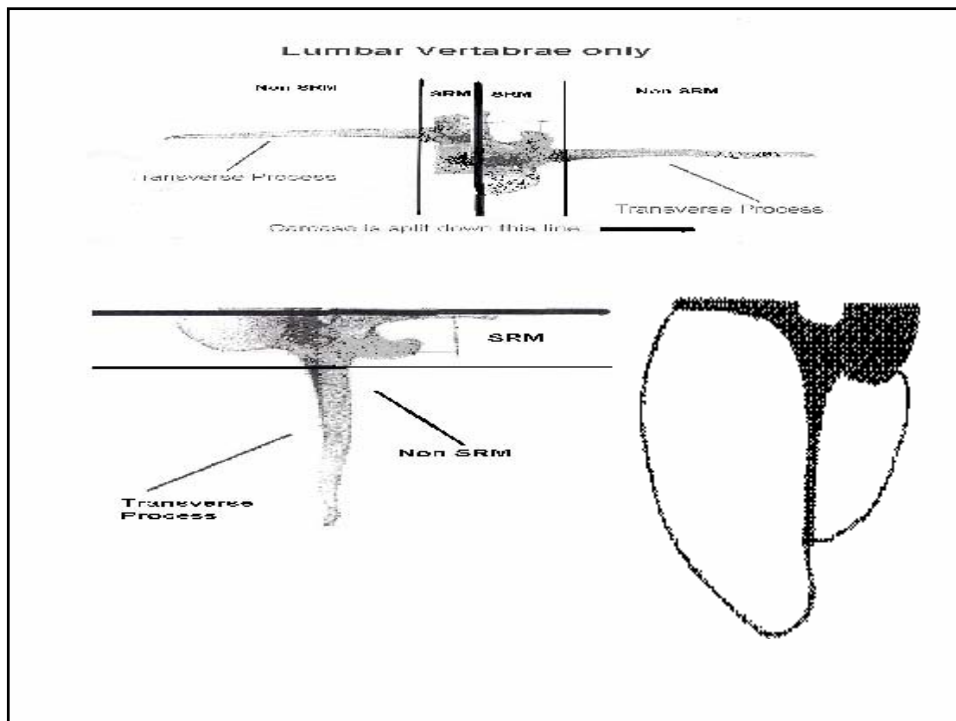
ARC 1030J Specified Product Requirements

- Transverse Process (Lumbar Vertebrae): Elongated plates that, flattened dorso-ventrally, project outward and may incline slightly upward or downward; their length increases to the third or fourth and then diminishes to the last
- Transverse Process (Thoracic Vertebrae): A short, thick process that extends horizontally from the main body of the vertebrae and is tuberos at the free end. Each has a facet (Foveatransversaria) for articulation with the tubercle of the rib

2/17/2006

Livestock and Seed Program

21



ARC 1030J Specified Product Requirements

- Bovine animals included in the BEV Program must be traceable to live animal production records which indicate 20 months of age or younger
- Records that will be used to verify this requirement by AMS must meet at least one of the following criteria:

ARC 1030J Specified Product Requirements

- Individual Animal Age Verification
- Group Age Verification
- Animals enrolled in an Approved USDA Process Verified Animal Identification and Data Collection Service that includes age

ARC 1030J Specified Product Requirements

- Physiological Maturity
- A40
- Performed by MGC Meat Graders
- Special Markings “J” Accepted as Specified.

ARC 1030J Specified Product Requirements

- Carcasses must be uniquely identified
- Shipping documentation must have the statement “Product Meets EV Program Requirements
- Company must be listed on the official Listing – Est # matches the web site

ARC 1030J Specified Product Requirements

- QSA/EV Manuals must be available for review by FSIS
- Canadian Cattle with Verified Birth dates are acceptable however Canadian Cattle are not acceptable for A40
- Removal of Spinal cord prior to FSIS final inspection

ARC 1030J Specified Product Requirements

- Vertebral column from carcasses destined for Japan must be removed
- Procedures to remove of the vertebral column must be the same as used for over 30 months of age
- Hygiene removal of Cheek meat

Contact Information for QSA or BEV

- James L Riva (202) 720-1124
James.Riva@usda.gov
- Dana Stahl (202) 720-2624
Dana.Stahl@usda.gov



EXPORT CERTIFICATION

Beef Export Verification Net Cast
Training
January 23, 2006

Draft

1



Purpose of Export Certification

- o Instills confidence in U.S. meat and poultry products

- o FSIS must maintain integrity, security, and accuracy

Draft

2



Export References

- FSIS Directive 9000.1 – Export Certification
- FSIS Form 9060-6
- FSIS Directive 9040.1 – Re-inspection of Product Intended for Export
- http://www.fsis.usda.gov/Regulations_&Policies/Export_Information/index.asp

Draft

3



FSIS Directive 9000.1

- Clarifies current Agency Policy
- FSIS Form 9060-6
- Pre-Stamping of Product
- Export Certificates
- Replacement Certificates
- Letterhead Certification
- Inventory

Draft

4



FSIS Form 9060-6

- Application for Export Certificate
- Reviewed by Inspection Program Personnel
- Organoleptic Evaluation
- Foreign Labeling
- Must be Signed by Plant Official

Draft

5



FSIS Form 9060-6

- Signing the Application indicates:
 - Product is eligible for export to the country
 - Plant is eligible to export to the country
 - Plants with EV programs are listed on AMS website
 - Eligible product is segregated from ineligible product.

Draft

6



FSIS Form 9060-6

- If FSIS personnel identify problems with the EV Program, contact AMS

Draft

7



Pre-Stamping of Product

Allowed if the establishment:

- Has identified an employee responsible for the stamp and certificate
- Ensures stamp is applied in a clear, legible manner to boxes in a sound condition
- Stamp is returned after completion

Draft

8



Export Certificates

- **Certifying officials**
 1. Verify that the information on the certificate is the same as what is on the application
 2. Contact the inspection employee who signed the application or exporter if you have any concerns.

Draft

9



Export Certificates

Before signing the certificate

Check for accuracy and corrections

Check for attachments and line-out of unused space

Check Export Library if receiving country allows minor alterations

Draft

10



Export Certificates

Before signing the certificate

If a continuation sheet is used, make sure the appropriate information is included

Sign only when the requirements of Directive 9000.1 are met.

Sign all required forms in **other than** black ink.

Draft

11



Export Certificates

Do not stamp the certificate with the export stamp or crimp it with the raised seal unless directed by the Export Library.

Retain a copy of the export certificate and any accompanying documents and return the original to the applicant.

Draft

12



Letterhead Certification

Issued for certain products for certain countries

Check Export Library

Prepared in quadruplicate (4 copies)

Specific information must be included

Draft

13



Accountable Item Inventory

- Export Certificates
- Export Stamps
- Inventory Records
- Lock or Seal

Draft

14



Questions

Export Certification

Beef Export Verification Net Cast
Training
January 23, 2006

Draft

15



Review of FSIS Notice

Clarification of Export Procedure for
Certifying Beef Product for Japan

Draft

1



Purpose

- Clarifies verification responsibilities when signing export certifications for beef product exported to Japan

Draft

2



Background

Fresh/Frozen Beef/Veal and offal is eligible for export if:

- Derived from animals **20** months of age or younger
- Spinal cord/spinal column(excluding transverse process of thoracic and lumbar vertebrae, wings of sacrum and vertebra of tail) are removed
- It is produced under an approved AMS Export Verification (EV) program

Draft

3

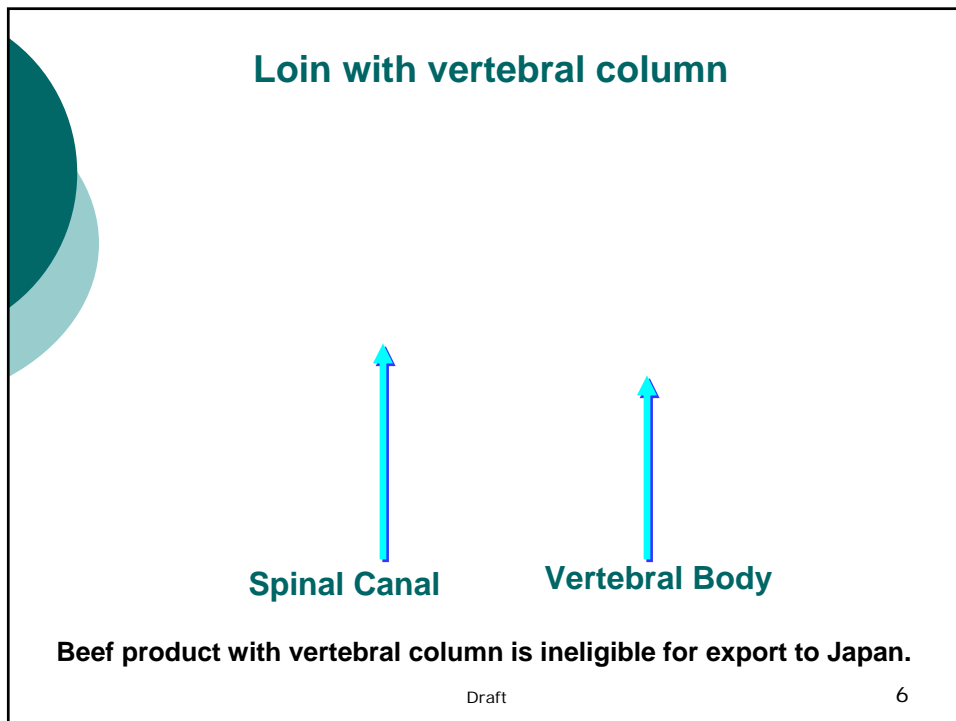
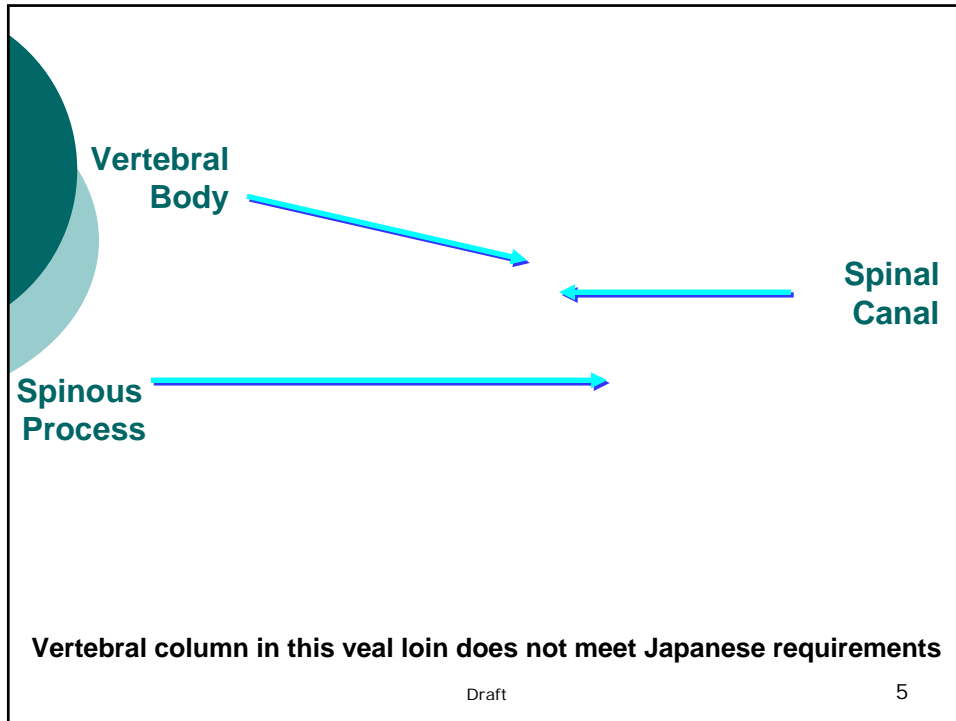


Product ineligible for export to Japan

**Loins with
vertebral column**

Draft

4





Background

Important information about the AMS EV program for Japan including the list of BEV approved establishments can be obtained from

<http://www.ams.usda.gov/lsg/arc/bev.htm>

Draft

7



Verification Procedures

When completing export certification, FSIS inspection program personnel verify:

1. The establishment is on the AMS BEV Japan list, and product was derived from cattle slaughtered after approval date
2. The product listed is eligible for export to Japan

Draft

8

Verification Procedures

When completing export certification, verify:

3. Plant management has certified in Block 14 of FSIS Form 9060-6, Application for Export, that the product meets EV requirements for Japan, and specific consignment details are provided



Draft

9

Verification Procedures

Consignment details include

- Product identification information
- Production date
- Number of boxes
- Manufacturer

Draft

10



Verification Procedures

Prior to issuing export certification, verify:

4. The establishment has completed Form 9060-5, the export certificate, and checked the box for red meat ante- and post- mortem certification

Draft

11



Verification Procedures

When completing export certification, verify:

5. The establishment has completed Form 9290-1, the Certification for Export to Japan

Draft

12



Verification Procedures

Verify that Form 9290-1 includes:

- All slaughter information – Block 5
- Cutting establishment – Block 6
- Packing date – Block 7
- Name and address of manufacturing plant – Block 8
- Slaughtered date – Block 9
- “Food Safety and Inspection Service” – Block 10

Draft

13



Verification Procedures

FSIS Inspection Program Personnel
sign the Export Certificates

1. Verify that products listed are eligible for export to Japan
2. Prepare and sign a Letterhead Certificate for Export of Beef and Beef Offal to Japan (see link)

http://www.fsis.usda.gov/Frame/FrameRedirect.asp?main=http://OFO/export/L_C_for_Export_of_Beef_and_Beef_Offal_to_Japan.pdf

Draft

14



Verification Procedures

If FSIS personnel become aware of concerns that an approved EV establishment is not properly executing its EV program:

- **Do not** issue export certification
- Notify AMS at ARCBranch@usda.gov
- Include supervisor on message

Draft

15



Verification Procedures

Include in message when notifying AMS:

1. Establishment name, address, and establishment number,
2. Product type, product code, and quantity of product.
3. Date of production, lot number, and shift,
4. Date and nature of observation,
5. Name of country product is intended for export,
6. Export certificate number (if applicable),
7. Any other information to verify claim,
8. Name of inspection official

Draft

16

Export Certification Scenarios

Scenario 1:

You are a PHV-IIC in a beef slaughter/processing operation. The establishment has an approved AMS-BEV program for the export of beef to Japan. The slaughter supervisor notifies you that they have received cattle from an approved cattle producer that is identified on the AMS website. These cattle are age verified through records which are audited by AMS to be less than 20 months of age. As you return from the ante-mortem pens you observe that this group of cattle is being slaughtered. As you proceed through the slaughter floor you happen to notice that the establishment is allowing a carcass which is identified for Japan to come into contact with the vertebral column of a carcass from another group of animals that is identified as being 30 months of age and older.

Through your training and knowledge of the AMS-BEV program, you know that the establishment, as part of complying with the BEV program, must have procedures in place to ensure that carcasses which are identified for export to Japan do not come into contact with cattle carcasses 30 months of age and older. You notify plant management that they are not properly executing their approved BEV program, and you accurately describe the event to the establishment management. You refuse to sign export certificates. You send a message to AMS at ARCBranch@usda.gov and include your supervisor on the message. You include the establishment information, product type, code, and quantity, date of production and lot number, date and description of your observations, name of importing country, and your name.

Scenario 2:

You are a CSI-IIC at a beef fabrication plant. The establishment has an approved AMS-BEV program for the exportation of beef to Japan. The plant manager notifies you that they will be processing carcasses for export to Japan tomorrow morning. The next morning the establishment is fabricating cattle that comply with the A-40 age grading. As you conduct observational operational sanitation procedures, the establishment is removing the vertebral column as required by the AMS-BEV requirements. The beef product is packaged in containers designated with product codes and box identifiers for Japan.

One week later the establishment submits an FSIS Form 9060-6 (Application for export to Japan) which contains product identification information, production date, number of boxes, manufacturer, and the statement "Product meets EV Program requirements for Japan" in Block 14 of FSIS Form 9060-6. You review the list of products on the application (FSIS Form 9060-6); and with your knowledge of the establishment's processes and products, you determine that the product listed as labeled on the FSIS Form 9060-6, are beef products that do not contain spinal cord or vertebral columns in accordance with the Japanese BEV requirements. You conclude that this product complies with the AMS-BEV program and you can certify the products on FSIS Form 9060-5 and the USDA letterhead certificate.

Scenario 3:

You are a CSI-IIC at a beef slaughter/processing establishment that has an approved AMS-BEV program for exportation of beef products to Japan. One day you receive an application for export to Japan (FSIS Form 9060-6). The application shows that the shipment contains five beef products that are in the establishment's freezer. The application is completed in accordance with the Export Library and provides the following information: product identification information, production date, and number of boxes, manufacturer, and the statement "Product meets EV Program requirements for Japan" in Block 14 of FSIS Form 9060-6.

You review the application (FSIS Form 9060-6) and with your knowledge of the establishment's processes and products, you find a product that is listed on the application that you believe contains vertebral column. You proceed to the staging cooler where the boxes of product are prepared for the application of the export stamp and inspection of the product. You ask the establishment management to open a box in a sanitary manner and you find that you are correct. The beef product contains vertebral column which is not in accordance with the Japanese BEV requirements, and is ineligible for export to Japan. The establishment management is informed that the product does not comply with the Japanese BEV requirements. You refuse to sign any export certificates for product destined to Japan and notify AMS of the incident. A noncompliance is not issued for the establishment's failure to meet the foreign country's importing requirements. You may discuss this failure with plant management at the weekly conference, and document that discussion.

Scenario 4:

You are a CSI-IIC at a cold storage establishment. One day the cold storage manager presents an application of export (FSIS Form 9060-6) for Japan, this is the first export to Japan at this facility. The application provides the required information as identified on the Export Library, which contains the following information: product identification information, production date, and number of boxes, manufacturer, and the statement "Product meets EV Program requirements for Japan" in Block 14 of FSIS Form 9060-6.

You proceed to review the Japanese export requirements for beef products that are provided on the Export Library. You review the AMS website, which has a link on the Export Library, and conclude that the slaughter and fabrication plant are on the approved plant list eligible to export eligible beef products to Japan. As you inspect the boxes in accordance with 9000.1, you find that the boxes are identified with labels for export to Japan. Because this is the first export to Japan at this facility, you elect to request the establishment to open a random sample of less than 5% of boxes from the lot. You observe that this is done in a sanitary manner in accordance with FSIS Directive 9040.1. You conclude that the boxes contain beef product that have the spinal cord and vertebral column removed in accordance with the Japanese BEV requirements. You proceed to issue an export certificate (FSIS Form 9060-5) and letterhead certificate for completion. Additionally, you release the custody of the export stamp to permit the establishment to pre-stamp boxes in accordance with FSIS Directive 9000.1. The export certificate and USDA letterhead certificate for export to Japan is acceptable to certify the product.

Export Certification Scenario

You are a CSI-IIC at a beef fabrication plant. The establishment has an approved AMS-BEV program for the exportation of beef to Japan. The plant manager notifies you that they will be processing carcasses for export to Japan tomorrow morning. The next morning the establishment is fabricating cattle that comply with the A-40 age grading. As you conduct observational operational sanitation procedures, the establishment is removing the vertebral column as required by the AMS-BEV requirements. The beef product is packaged in containers designated with product codes and box identifiers for Japan.

One week later the establishment submits an FSIS Form 9060-6 (Application for export to Japan) which contains product identification information, production date, number of boxes, manufacturer, and the statement "Product meets EV Program requirements for Japan" in Block 14 of FSIS Form 9060-6. You review the list of products on the application (FSIS Form 9060-6); and with your knowledge of the establishment's processes and products, you determine that the product listed as labeled on the FSIS Form 9060-6, are beef products that do not contain spinal cord or vertebral columns in accordance with the Japanese BEV requirements. You conclude that this product complies with the AMS-BEV program and you can certify the products on FSIS Form 9060-5 and the USDA letterhead certificate.



FSIS
BEV Net cast

Pop Quiz!

Draft

1



Question 1

Japan has different material not allowed than FSIS regulations.

According to the Japanese Beef Export Verification procedures (BEV), what are the materials that are required to be removed from beef product processed for export to Japan?

Draft

2



Question 1 - Answer

Bovine heads (except for hygienically removed tongues and cheek meat, but including tonsils); spinal cords; distal ileum (two meters from connection to caecum); and vertebral column (excluding the transverse processes of the thoracic and lumbar vertebrae, the wings of the sacrum, and the vertebrae of the tail).

Draft

3



Question 2

Each establishment is to have written procedures to identify carcasses which comply with the Japanese requirements through slaughter, fabrication, packaging, storage, and shipping to ensure the integrity of the process and the product.

What are the product codes and methods of identification of the packages which contain beef product that comply with the Japanese requirements?

Draft

4



Question 2 - Answer

All carcasses (Age verification by A40 carcass grading or records) must be uniquely identified. Carcasses complying with the “Age Verification through Carcass Evaluation” must be marked once evaluated and approved by proficiency-tested USDA Evaluators. These identification marks must remain with the product through processing, packaging, storage, and shipping to insure the integrity of the process and the product.

Draft

5



Any further questions?

Thanks for your participation today.

Draft

6

Beef Export Verification Training



1

Important websites

FSIS Export Information

[http://www.fsis.usda.gov/Regulations_& Policies/Export_Information/index.asp](http://www.fsis.usda.gov/Regulations_&Policies/Export_Information/index.asp)

AMS USDA Export Verification Program for Japan (Beef)

<http://www.ams.usda.gov/lsg/arc/evjapan.htm>

AMS USDA Export Verification Program (Beef, Bovine, and Ovine)

<http://www.ams.usda.gov/lsg/arc/bev.htm>



2

Important references

FSIS Directive 9000.1 Export Certification

NEW FSIS Directive 9040.1 Revision 3 Reinspection of Product Intended for Export

NEW FSIS Notice Clarification of Export Procedure for Certifying Beef Products for Japan and Certifying Beef Products Under any Beef Export Verification (BEV) Program

AMS ARC I030J Procedure 12/12/2005 USDA Export Verification (EV) Program Specific Product Requirements for Beef-Japan





United States Department of Agriculture

Tuesday, January 24, 2006
2:30-5:30 pm EST
Jefferson Auditorium
USDA South Building
14th and Independence Avenue SW
Washington, DC

Meeting of Packer/CEO Participants in Beef Export Verification Programs

Moderator

Richard A. Raymond, M.D.
Under Secretary, Office of Food Safety

Opening Remarks

Mike Johanns
Secretary of Agriculture

Review of Plant's Quality Control Responsibilities

Barry Carpenter, Agricultural Marketing Service

Review of Country Requirements and Export Certification Process

Karen Stuck, Food Safety and Inspection Service

Closing Remarks

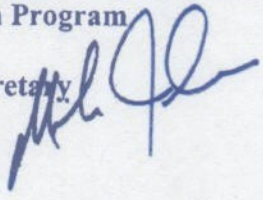
Charles F. Conner
Deputy Secretary of Agriculture



THE SECRETARY OF AGRICULTURE
WASHINGTON, D. C.
20250-0100

MEMORANDUM

TO: Packer/CEO Participants in Japan Beef
Export Verification Program

FROM: Mike Johanns, Secretary 

DATE: January 20, 2006

RE: Trade with Japan

As you know, product has been shipped to Japan that fails to meet the requirements of our agreement for resumption of trade. I have announced a series of actions that are being undertaken to ensure that both industry and government fully comply with the provisions in our agreement with Japan.

To ensure that all companies approved for export of product to Japan are fully aware of what is required I have scheduled a meeting for Tuesday, January 24, 2006, from 1:00 pm until 5:00 pm, to be held in the Jefferson Auditorium, USDA's South Building, 14th Street and Independence Avenue SW, Washington, DC. Participation by company Chief Executive Officers and their plant quality assurance directors is expected.

If you have any questions, please contact Barry Carpenter at 202-720-5705 .

USDA

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
OFFICE OF PROGRAM EVALUATION, ENFORCEMENT AND REVIEW
Compliance and Investigations Division

Japan Export Investigation Report
Golden Veal Corp. & Atlantic Veal and Lamb, Inc.

Exhibits

February 14, 2006

Approved By:

William C. Smith
Assistant Administrator, OPEER

This document is FOR OFFICIAL USE ONLY. It and its contents are not to be distributed outside your agency, nor duplicated without prior clearance from the Office of Program Evaluation, Enforcement and Review.



List of Exhibits

<u>Exhibit Number</u>	<u>Description</u>
1	Golden Veal's AMS Application for Service Atlantic's AMS Application for Service
2	USDA-AMS EV Program Requirements for Japan
3	Golden's Quality System Manual Atlantic's Quality System Manual
4	E-mail from Mr. Nobuo Shiraiwa (Japan) explaining Japan's change to EV Program for veal dated 12/8/05
5	MOI AMS Program Manager Dana Stahl
6	Golden's AMS Quality System Assessment Desk Audit Atlantic's AMS Quality System Assessment Desk Audit
7	MOI AMS Auditor Darrell Wilson
8	Golden's AMS Notification of Audit Results Golden's AMS Quality System Assessment Initial On-Site Audit Atlantic's AMS Notification of Audit Results Atlantic's AMS Quality System Assessment Initial On-Site Audit
9	E-mail from AMS Wilson concerning Fisher Audit Question
10	MOI Golden and Atlantic President Phillip Peerless
11	MOI AMS Auditor David Hildreth
12	Physiological Maturity Evaluation
13	MOI AMS Grader Lane Biddle

List of Exhibits Continued

<u>Exhibit Number</u>	<u>Description</u>
14	Shipping Declaration BOL # G-5140 dated 1/11/06 Bill of Lading #5140 dated 1/11/06 Shipping Declaration BOL # G-5141 dated 1/11/06 Bill of Lading# 5141 dated 1/11/06
15	MOI Golden Plant Manager James Fisher
16	Golden's Fire Report
17	Atlantic's Receiving Record 3959 dated 1/12/06
18	Atlantic's Meat Receiving Log for EV Program dated 1/12/06
19	Atlantic's Daily Production Log (EV) dated 1/12/06
20	Atlantic's Daily Production Log (EV) dated 1/13/06
21	Voided Package for Export MPF-455142
22	Voided Package for Export MPF-455143
23	Package for Export MPF-455144
24	Sworn Statement IISDA-OFO-CSI Wai A. Or
25	Signed Statement LJSDA-OFO-PFIV Keith Wills
26	MOI AMS Supervisor Malcolm Wright
27	MOI AMS Audit Branch Chief James Riva
28	E-mail from Mr. Nobuo Shiraiwa (Japan) dated 12/27/05
29	Shipping Documents from Broker (MOL Logistics)
30	Delisting of Golden and Atlantic e-mail
31	MOI Golden Plant Manager James Fisher dated 2/2/06
32	MOI Atlantic General/Plant Manager Eliseo (Eddie) Cruz
33	MOI Quality Assurance Manager Elvira Cunha

- 34 MOI President Phillip Peerless
- 35 MOI Golden's Administrative Assistant/Auditor Lisa Meese
- 36 MOI AMS Branch Chief James Riva
- 37 MOI Atlantic's Shipping and Receiving Manager Wesley
Martinez
- 38 MOI Atlantic's Production Supervisor/Fabrication Manager
Hector Lopez
- 39 E-mails between President Phillip Peerless and AMS,
FSIS, and U.S. Senators Clinton and Schumer
concerning expediting EV Program Approval