



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

OCT 05 2007

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

Dear Dr. Reynolds:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Great Britain's meat inspection system May 9 to May 17, 2007. Comments from Great Britain have been included in the final audit report. Enclosed is a copy of the final audit report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (402) 344-5100, by facsimile at (402) 344-5169, or electronic mail at donald.smart@fsis.usda.gov.

Sincerely,

Donald Smart
Director
International Audit Staff
Office of International Affairs

Enclosure

FINAL

OCT - 3 2007

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

MAY 9 through MAY 17, 2007

**Food Safety and Inspection Service
United States Department of Agriculture**

TABLE OF CONTENTS

1. INTRODUCTION
2. OBJECTIVE OF THE AUDIT
3. PROTOCOL
4. LEGAL BASIS FOR THE AUDIT
5. SUMMARY OF PREVIOUS AUDITS
6. MAIN FINDINGS
 - 6.1 Legislation
 - 6.2 Government Oversight
 - 6.3 Headquarters Audit
7. ESTABLISHMENT AUDITS
8. LABORATORY AUDITS
9. SANITATION CONTROLS
 - 9.1 SSOPs
 - 9.2 SPS
 - 9.3 EC Directive 64/433
10. ANIMAL DISEASE CONTROLS
11. SLAUGHTER/PROCESSING CONTROLS
 - 11.1 Humane Handling and Slaughter
 - 11.2 HACCP Implementation
 - 11.3 Testing for Generic *Escherichia coli*
 - 11.4 Testing for *Listeria monocytogenes*
 - 11.5 EC Directive 64/433
12. RESIDUE CONTROLS
 - 12.1 EC Directive 96/22
 - 12.2 EC Directive 96/23
13. ENFORCEMENT CONTROLS
 - 13.1 Daily Inspection
 - 13.2 Testing for *Salmonella*
 - 13.3 Species Verification
 - 13.4 Periodic Reviews
 - 13.5 Inspection System Controls

14. CLOSING MEETING

15. ATTACHMENTS TO THE AUDIT REPORT

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority (Department for Environment, Food and Rural Affairs)
DEFRA	Department for Environment, Food and Rural Affairs
EC	European Commission
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
FSA	Food Standard Agency
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
<i>Lm</i>	<i>Listeria monocytogenes</i>
MHS	Meat Hygiene Service
NOID	Notice of Intent to Delist
OV	Official Veterinarian
RVA	Regional Veterinary Adviser
<i>Salmonella</i>	<i>Salmonella</i> species
SSOP	Sanitation Standard Operating Procedure(s)
VEA	European Community/United States Veterinary Equivalence Agreement
VDM	Veterinary Medicines Directorate
VMHA	Veterinary Meat Hygiene Adviser
VPHOD	Veterinary Public Health Operations Division

1. INTRODUCTION

The audit took place in Great Britain from May 9 through May 17, 2007.

An opening meeting was held on May 9 in London with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary and requested additional information needed to complete the audit of Great Britain's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the Department for Environment, Food and Rural Affairs (DEFRA), as well as the Food Standard Agency (FSA).

2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, one regional inspection office, one local inspection office, and one slaughter and cutting establishment.

Competent Authority Visits			Comments
Competent Authority	Central	1	Central office of DEFRA in London
	Regional	1	MHS regional office in York.
	Local	1	Establishment level
Laboratories		0	
Meat Slaughter and Cutting Establishments		1	Malton
Processing Establishments		0	

3. PROTOCOL

This on-site audit was conducted in three parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved the visit of regional and local government offices. The third part involved an on-site visit to one slaughter and cutting establishment.

Program effectiveness determinations of Great Britain's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP), (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP

programs, (4) residue controls, and (5) enforcement controls. Great Britain's inspection system was assessed by evaluating these five risk areas.

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

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

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

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

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

4. LEGAL BASIS FOR THE AUDIT

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

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to End), which include the Pathogen Reduction/HACCP regulations.

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

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

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS’ website at the following address:

http://www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp

The last two audits of Great Britain’s inspection system have identified several problems.

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

- In one establishment, rust was observed on the overhead structures of the cutting room and the carcass coolers.
- In one establishment, employees who regularly work with product and product-packaging materials were identified wearing their work uniforms in the establishment’s restrooms and returning to work without changing these garments.
- In one establishment, dust and cobwebs were identified in the annex used for dry storage, and the walls of this area were in need of repair.
- Insanitary conditions were found in the locker rooms of the two establishments audited.
- In one establishment, some lockers needed repair because they were dented or rusty.
- In one establishment, laundered uniforms were touching the floor because the hanging racks were too short.
- In one establishment, gaps were identified around the loading dock that were large enough to allow the entry of pests and other rodents from the outside.
- The contract between the residue lab audited and the Veterinary Medical Services stipulated a turnaround time of 28 days or less for 90 % of the lab results. However, only 80% of the results were meeting this timeframe.

During the most recent audit of Great Britain, conducted by FSIS in March 2006, the following deficiencies were identified:

- In one establishment, the FSIS/EC regulatory requirements were not adequately enforced by the CCA.

- In one establishment, 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.

6. MAIN FINDINGS

6.1 Legislation

The auditor was informed that the relevant EC Directives, determined equivalent under the VEA, had been transposed into Great Britain's legislation.

6.2 Government Oversight

6.2.1 CCA Control system

The CCA, the Department for the Environment, Food and Rural Affairs, is responsible for trade with countries outside of EU. DEFRA carries out all communications with FSIS and will communicate official instructions to establishments certified to export to the U.S. The Animal Health Division of DEFRA has a working agreement with the Veterinary Public Health Operation Division (VPHOD) of the Food Standards Agency. FSA carries out the practical inspections and make recommendations for approval or delisting to DEFRA and ensures the correct application of FSIS requirements in the certified establishments. This function is performed by the Veterinary Meat Hygiene Advisors (VMHA) from the VPHOD of the FSA. The Working Agreement with DEFRA states that the implementation of FSIS requirements is the responsibility of the VMHA and therefore all communication between DEFRA Animal Health Division and the VPHOD of the FSA is directed to the VMHA. The Meat Hygiene Service, an executive agency of FSA, provides government veterinarians and inspectors for official meat and poultry establishments (domestic and exporting) by either direct hiring or through contract services. All official veterinarians and inspectors assigned to the two establishments currently certified to export to the U.S. are on contract with MHS. The FSA has the authority to cancel the contracts with inspection personnel at any time if it is deemed necessary. The Official Veterinarians (OVs) and inspectors report directly to the Regional Veterinary Advisor (RVA) of MHS.

6.2.2 Ultimate Control and Supervision

DEFRA, as the CCA, has the authority to remove establishments from the list of establishments certified to export to the U.S., and refuse the issuance of veterinary health certificates to prohibit exports from taking place. The decision as to whether the establishment is failing to meet U.S. requirements and the recommendation that delisting should occur is responsibility of the VMHA. The final decision considering delisting is done in cooperation by DEFRA Animal Health Division and FSA.

6.2.3 Assignment of Competent, Qualified Inspectors

The auditors observed that competent, qualified inspectors were assigned to the establishments eligible to export to the United States. In addition, all inspection personnel working in Great Britain's establishments must be fully qualified in accordance with legislative and instructional requirements. The MHS hires only those veterinarians designated as Official Veterinarians by the FSA for work in slaughter facilities.

6.2.4 Authority and Responsibility to Enforce the Laws

DEFRA, as the CCA, can remove establishments certified to export to the U.S. if FSIS requirements are not met. Monitoring of these requirements is carried out by VMHA and monthly by the RVA from the MHS under the requisite schedule of visits.

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

6.2.5 Adequate Administrative and Technical Support

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

6.3 Headquarters Audit

The auditors conducted a review of inspection system documents at the headquarters, regional, local, and in-plant inspection offices at the audited establishments. The records review focused primarily on food safety hazards and included the following:

- Methods of payment to inspection personnel.
- Proper distribution of relevant legislation to inspection personnel.
- Process of hiring, qualification and assignment of inspection personnel to the US certified establishments.
- Internal review reports,
- Supervisory visits to establishments that were certified to export to the U.S.,
- Training records for inspectors and laboratory personnel,
- Animal disease status,
- Supervisory visits to U.S. certified establishments,
- New laws and implementation documents such as regulations, notices, directives and guidelines,
- Official communications with field personnel, both in-plant and supervisory, in U.S. certified establishments,
- Sampling and laboratory analyses for residues,
- Sanitation, and slaughter inspection procedures and standards,
- Enforcement actions.

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

6.2.1 Audits of Regional and Local Inspection Sites

Regional Office

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

No deficiencies were observed.

Local Inspection Site at the Certified Establishment

The purpose of the assessment was to review the meat inspection records and determine the level of government oversight and control provided by the local inspection office relative to the certified establishments.

No deficiencies were observed.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited one slaughter and cutting establishment. This establishment received a Notice of Intent to Delist (NOID) from the FSA and DEFRA because of SSOP and SPS implementation deficiencies. This establishment may retain its certification for export to the United States provided that the management corrects all deficiencies noted during the audit within 30 days of the date the establishment was audited, or it is to be delisted by MOH. The specific deficiencies are noted on the attached individual establishment reports.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

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

No residue or microbiology laboratory was audited at this time.

9. SANITATION CONTROLS

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

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

In addition, except as noted below, Great Britain's inspection system had controls in place for light, back-siphonage prevention, temperature control, ante-mortem facilities, ventilation, plumbing and sewage, water supply, dressing rooms/lavatories, welfare facilities, outside premises and condemned product control.

No deficiencies were identified concerning these elements at the establishment audited.

9.1 SSOP

One establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The SSOP in the audited establishment was found to meet the basic FSIS regulatory requirements, with the following deficiencies:

- Extensive grease from overhead structures was observed on the conveyor belt in the cutting room, which was transporting edible product, and on a small but significant number of carcasses in the cooler.
- Pieces of meat scraps and fat particles were found on the "Christmas tree" hangers in the primal cuts area during pre-operational sanitation inspection.

9.2 SANITATION PERFORMANCE STANDARDS

- The conveyor belt for pork loins was observed with deep scoring during the pre-operational sanitation inspection in the primal cuts area.
- An employee in the export room area was observed contacting the liner of a combo bin for edible product with his boots.

9.3 EC Directive 64/433

In one establishment, in the EC Directive 64/433, deficiencies were identified. The specific deficiencies are noted in the attached individual establishment report.

10. ANIMAL DISEASE CONTROLS

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

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

11. SLAUGHTER/PROCESSING CONTROLS

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

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

11.1 Humane Handling and Humane Slaughter

No deficiencies were identified regarding humane handling or humane slaughter.

11.2 HACCP Implementation

No deficiencies were identified regarding HACCP implementation.

11.3 Testing for Generic *E. coli*

FSIS has determined the use of *Enterobacteriaceae* and Total Viable Count in lieu of testing for generic *E. coli* is acceptable for all EU exporting countries. However, the establishment certified to export product to the U.S. had decided to test for generic *E. coli*.

No deficiencies were identified regarding the testing programs for generic *E. coli*.

11.4 Testing for *Listeria monocytogenes*

The establishment audited was not producing ready-to-eat products for export to the United States and was not required to meet the FSIS requirements for *Listeria monocytogenes* testing. Great Britain is only exporting raw pork to the U.S.

11.5 EC Directive 64/433

In the audited establishment, the provisions of EC Directive 64/433 were not effectively implemented in two cases.

12. RESIDUE CONTROLS

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

No residue laboratory was reviewed during this audit.

Great Britain's National Residue Control program for 2007 was being followed and was on schedule.

12.1 EC Directive 96/22

No residue laboratory was reviewed during this audit.

12.2 EC Directive 96/23

No residue laboratory was reviewed during this audit.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed is Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella* species. The following deficiency was identified in this category:

- The conveyor belt for pork loins was observed with deep scoring during the pre-operational sanitation inspection in the primal cuts area.

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in the audited establishment and was well-documented.

13.2 Testing for *Salmonella* Species

One establishment was required to test for *Salmonella* in raw product. Great Britain has adopted the FSIS requirements for the testing of carcasses for *Salmonella* with the exception of the following equivalent measures:

- The establishment is authorized to collect samples.
- A private laboratory analyzes the samples.

- The laboratory method utilized is based on BS EN ISO 6579:2002.

No deficiencies were identified regarding the testing programs for *Salmonella* species.

13.3 Species Verification

At the time of this audit, Great Britain was required to test product for species verification. Species verification was being conducted in this establishment as required.

13.4 Periodic Reviews

Periodic supervisory reviews of the certified establishment were being performed and documented as required at the time of the audit.

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, disease or disabled animals; shipment security, including shipment between establishments; to prevent commingling of product intended for export to the U.S. 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 countries for further processing.

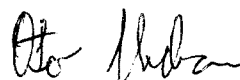
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on May 17, 2007 in London with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. Oto Urban
Senior Program Auditor



15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Forms

Foreign Country Response to Draft Final Audit Report (when it becomes available)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Grampian Country Pork Limited Hugden Way Malton, North Yorkshire	2. AUDIT DATE 5 - 14 - 2007	3. ESTABLISHMENT NO. UK 2060 EC	4. NAME OF COUNTRY England
	5. NAME OF AUDITOR(S) Dr. Oto Urban		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> 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	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	X
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Est. UK 2060 EC, 5-14-07, Grampian Industry Pork, slaughter/processing, Malton, North Yorkshire, England

10 Grease from the overhead structures was observed on the conveyor belt with edible product in the cutting room, and on a small but significant number of carcasses in the cooler. These deficiencies were partially corrected during the presence of the auditor {9 CFR 416.13c}.

10 Pieces of meat scraps and fat particles found on the "Christmas tree" hangers in the primal cuts area during the pre-operational sanitation. This deficiency was corrected immediately by the establishment officials {9 CFR 416.13c}.

40/56 The light intensity on the re-inspection table was not sufficient (440 lux, while 540 lux is required) in the primal cuts area. This deficiency was scheduled for corrective action by the establishment management {9 CFR 416.2C} and EC Directive 64/433, Annex I, Chapter I, 1(f).

45/51/56 The conveyor belt for transport of back bones was observed with deep cuts during the pre-operational sanitation in the primal cuts area. This deficiency was scheduled for the same day corrective action by the establishment management {9 CFR 416.3a} and EC Directive 64/433 Annex I, Chapter V, 18(c).

46/56 Employee was observed to contact the combo liner with his boots in the export room area. This deficiency was corrected by the establishment management by removing the liner {9 CFR 416.4d} and EC Directive 64/433, Annex I, Chapter V, 18.

58 This establishment was issued NOID by FSA & MHS for extensive SSOP deficiencies.

61. NAME OF AUDITOR

Oto Urban. DVM

62. AUDITOR SIGNATURE AND DATE



10/3/07

Room 403c
1A Page Street
London
SW1P 4PQ

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



Your reference:
Our reference: EXM 1751

(By fax: 00 1 202 690 4040)

Dr Donald Smart
Director
International Audit Staff
Office of International Affairs
USDA FSIS
1400 Independence Avenue SW
Washington, D.C. 20250

13 September 2007

Dear Dr Smart

DRAFT FINAL REPORT OF FSIS AUDIT OF GREAT BRITAIN'S MEAT INSPECTION SYSTEM

Thank you for your letter of 12 July 2007 addressed to Debby Reynolds, which enclosed a copy of the draft final report of the FSIS on-site audit carried out in May 2007. The letter and report were forwarded by the US Embassy in London and received in this office on 18 July 2007.

We would like to offer the following comments on the draft audit report:

1. Section 9.1 SSOP deficiencies

This section points to "Extensive grease from overhead structures.." and "...on many carcasses in the cooler". From our observations at the time, we would suggest that these comments could be modified to read "several points were contaminated with grease" and "also on a small but significant number of carcasses in the cooler".

2. Observation on Item 10 at page 2 of Foreign Establishment Audit Checklist

The auditor observed that "These deficiencies were only partially corrected during the presence of the auditor". We feel that this may give an impression of an inability by the operator to completely correct them. This turned out not to be the case. As much corrective action as could be taken was taken at the time of the audit including inspecting and trimming affected carcasses and completely cleaning the conveyor belt in question. I am pleased to say that within 30 days all necessary corrective action was taken to address comments made by the auditor.

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

Kind regards.

Yours sincerely

A handwritten signature in cursive script that reads "Nick Coulson".

Dr Nick Coulson

Head, International Animal Health Division

cc: Debra Henke, Acting Minister-Counsellor for Agricultural Affairs,
US Embassy, London
(by fax: 020 7894 0031)
(by email: debra.henke@usda.gov)
Oliver Griffiths (e-mail: oliver.griffiths@fco.gov.uk)
Lorenzo Terzi, DG SANCO E3
Steve Knight, Agricultural Specialist, US Embassy, London
(by email: steve.knight@usda.gov)