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

MAY 5 2006

Dr. Moshe Chaimovitz
Director, Veterinary Services and Animal Health
Ministry of Agriculture and Rural Development
Post Office Box 12 Bet Dagan
Israel 50250

Dear Dr. Chaimovitz:

This letter transmits the final report of the Food Safety and Inspection Service's on-site audit of Israel's poultry inspection system conducted November 24 through December 22, 2005. I understand that the government of Israel chose not to submit comments for this final report.

If you have any questions or need additional information regarding the enclosed audit report, please contact me by telephone at 202-720-3781, by fax at 202-690-4040, or by electronic mail at sally.white@fsis.usda.gov.

Sincerely,

Sally White JD

Sally White
Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc:

Dr. Eliezer Nili, Director, Control of Animal Products, MARD, VSAH, Israel
Asif Chaudhry, Counselor, US Embassy, Cairo
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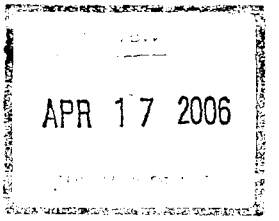
FINAL



FINAL REPORT OF AN AUDIT CARRIED OUT IN ISRAEL COVERING ISRAEL'S POULTRY INSPECTION SYSTEM

NOVEMBER 24 THROUGH DECEMBER 22, 2005

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority [Veterinary Services and Animal Health]
CCP	Critical Control Point
CL	Critical Limits
CVCAP	Chief Veterinary Control and Animal Production
DVS	Director, Veterinary Services
DFSL	Director, Food Safety Laboratories
E. coli	*Escherichia coli*
FSIS	Food Safety and Inspection Service
Lm	*Listeria monocytogenes*
MARD	Ministry of Agriculture and Rural Development
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
RVO	Regional Veterinary Officer
RTE	Ready-to-Eat
SSOP	Sanitation Standard Operating Procedures
Salmonella	*Salmonella* species
VSAH	Veterinary Services and Animal Health

1. INTRODUCTION

The audit took place in Israel from November 24 through December 22, 2005.

An opening meeting was held on November 24, 2005, in Bet Dagan 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 Israel's poultry inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA and/or representatives from the district offices.

2. OBJECTIVE OF THE AUDIT

This audit was a routine annual audit with three objectives. 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 poultry products to the United States. The second objective was to assess the status of corrective actions taken as a result of deficiencies identified in the Food Safety and Inspection Service (FSIS) February 2002 audit of Israel's poultry inspection system. The third objective was to verify the implementation of FSIS regulatory requirements regarding *Listeria monocytogenes* (*Lm*) and *Salmonella* spp. testing of ready-to-eat (RTE) products by Veterinary Services and Animal Health (VSAH) laboratories.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, two district inspection offices, ten local offices at the establishment level, two laboratories performing analytical testing on United States-destined product, six poultry and/or turkey slaughter establishments, and four poultry processing establishments.

Competent Authority Visits			**Comments**
Competent Authority	Central	1	
	District	2	
	Local	10	Establishment level
Laboratories		2	
Poultry Slaughter Establishments		6	
Poultry Processing Establishments		4	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection

headquarters and district offices. The third part involved on-site visits to ten establishments: six slaughter establishments and four processing establishments. The fourth part involved visits to one government and one private laboratory. Kimron Veterinary Institute, a government laboratory, was conducting analyses of field samples for *Lm* and *Salmonella* in RTE products and Israel's national residue control program. Bactochem Laboratories Ltd., a private laboratory was conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella*.

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

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

At the opening meeting, the auditor explained that Israel's poultry inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Israel. FSIS requirements include, among other things, daily inspection in all certified establishments, monthly supervisory visits to certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella*.

Equivalence determinations are those that have been made by FSIS for Israel under provisions of the Sanitary and Phytosanitary Measures Agreement. Israel has adopted the FSIS regulatory requirements for generic *E. coli* testing with the following exception:

- Testing for generic *E. coli* is conducted at government laboratories.

Under this determination, FSIS stated that 1) the laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record keeping facilities and 2) the results of analyses including all permanently recorded data and summaries are reported promptly to the establishment.

4. LEGAL BASIS FOR THE AUDIT

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

- The Poultry Products Inspection Act (21 U.S.C. 451 et seq.) and the Poultry Products Inspection Regulations (9 CFR Part 381 to End), which include the Pathogen Reduction/HACCP regulations.

5. SUMMARY OF THE PREVIOUS AUDIT

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

During the previous audit, February 26 through March 17, 2002, one of the ten establishments that were audited was evaluated as "Acceptable – Re-Review." Shortly after the completion of this audit, FSIS modified our audit protocols and the term, "Acceptable – Re-Review," was revised to reflect current terminology as "Notice of Intent to Delist (NOID)." In both circumstances, the intent is the same. The language was modified to reflect a change in FSIS regulatory terminology.

Further, FSIS identified the following deficiencies during the audit:

- In one of the ten establishments, FSIS found inadequate implementation of HACCP requirements:
  - The annual reassessment of the HACCP plan was not conducted.
  - The establishment did not perform pre-shipment document reviews.
  - The Critical Limits (CL) at the Critical Control Points (CCP) were not monitored.
- In two of the ten establishments, SSOP implementation problems were found.
  - For example, the drip pan underneath the chiller was leaking onto the birds.
- In one of the ten establishments, the sanitation controls were inadequate.

6. MAIN FINDINGS

6.1 Government Oversight

6.1.1 CCA Control Systems

Israel's CCA is the Ministry of Agriculture and Rural Development (MARD), VSAH. The inspection system has three levels of supervision. The first is the headquarters level of VSAH in Bet Dagan. At this level, all activities that concern poultry exports to the United States are coordinated by the Chief Veterinarian for Control of Animal Products. The Chief Veterinarian oversees two districts offices which compromise the second level of supervision over the establishments. Israel has two districts offices that are located in Bet Dagan and Haifa. These offices oversee the establishment level inspection personnel. Finally, the third level of supervision is the establishment level inspection personnel. In every establishment that is certified to export to the United States, the inspection staff has offices to maintain their records.

6.1.2 Ultimate Control and Supervision

Supervisory reviews of each certified establishment were not performed monthly. Of those monthly reviews that were performed, a summary of the monthly audit report is filed at the District Veterinary Office (DVO), as well as in the central headquarters. The FSIS auditor verified that the most recent report generated from these reviews did not adequately document the SSOP and Pathogen Reduction (PR)/ HACCP requirements.

Many of the deficiencies identified by the FSIS auditor should have been documented by the inspection personnel in reports distributed throughout the organizational structure. However, the findings were not identified. The CCA did not ensure that U.S. requirements were being met by the establishments.

Inspection documents were appropriately distributed throughout the system. However, FSIS found no evidence that the instructions were implemented.

6.1.3 Assignment of Competent, Qualified Inspectors

Full-time, permanent CCA veterinarians must have a university degree in Veterinary Science or Veterinary Medicine and must be licensed by the Director of Veterinary Services to be considered qualified to apply for the inspection service. Veterinary Assistants must have a minimum of a high school diploma. After they are hired, they receive six weeks of on-the-job training. All veterinarians working in poultry inspection receive two days of training in SSOP, PR/HACCP systems and *E. coli* testing, *Lm* and *Salmonella* testing at the headquarters yearly.

As evidenced by the observations of this audit, inspection personnel did not demonstrate an understanding of FSIS requirements needed to oversee and enforce United States import inspection requirements. FSIS provided technical assistance to Israel, and yet, FSIS did not find evidence that the FSIS requirements were implement.

6.1.4 Authority and Responsibility to Enforce the Laws

MARD has the authority and responsibility to enforce the applicable laws relevant to U.S. certified establishments. MARD has the authority to approve establishments for export to the United States and has the responsibility for withdrawing such approval when establishments do not have adequate and/or effective controls in place to prevent, detect, and eliminate product contamination or adulteration. The Regional Veterinary Officer (RVO) are in-charge of verifying and evaluating the implementation of the official guidelines and instructions.

According to FSIS regulations, Israel provides FSIS with an annual certification list of establishments that meet all FSIS import requirements. The majority of the findings identified during this audit should have resulted in enforcement actions by Israel prior to the start of this audit.

6.1.5 Adequate Administrative and Technical Support

FSIS observed deficiencies with regard to the technical support required to operate Israel's inspection system as evidenced by the findings from the laboratory reviews (See sections 8.)

6.2 Headquarters Audit

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

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

The following concerns arose as a result the examination of these documents and interviews:

- VSAH officials did not demonstrate that they have effective oversight that would facilitate accountability of the DVO inspection officials and effective supervision of inspection activities at the establishment level.
- There was inadequate verification of the implementation of U.S. requirements by VSAH headquarters personnel.
- VSAH auditing procedures were not effective as evidenced by the audit findings.
- There was not enough formal training in PR/HACCP requirements for government veterinary inspectors to ensure continued veterinary inspector skills and competence.

6.3 District Offices Audit

The auditor also reviewed Israel's poultry inspection records at VSAH's two District Offices. In both locations, the auditor interviewed the RVO. The purpose of the interviews was to review the poultry inspection records and determine the level of government oversight and control provided by the DVO relative to the certified establishments.

The following concerns arose as a result the examination of these documents and interviews.

- All relevant regulations, notices, and other inspection documents and records were not adequately maintained at the DVO and the ten certified establishments.
- DVO officials did not demonstrate that they have effective oversight that would facilitate accountability of the inspection officials at the establishment level.
- DVO officials did not demonstrate that they have adequate supervision over veterinary inspectors in certified poultry establishments.
- There was inadequate verification of the implementation of U.S. requirements by the DVO.
- RVO auditing procedures were not effective as evidenced by the audit findings.
- The supervisory reviews were not conducted monthly in ten certified establishments.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of ten establishments. FSIS audited six slaughter establishments and four processing establishments.

Two establishments were delisted and five establishments received a NOID because of findings related to direct product contamination and the potential of product contamination, inadequate verification of HACCP systems, and implementation of SSOP and insufficient government oversight and enforcement of the FSIS inspection requirements.

Specific deficiencies are noted in the attached Foreign Establishment Audit Checklists.

8. LABORATORY AUDITS

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

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

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test United States samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS PR/HACCP requirements.

The following laboratories were reviewed:

The Kimron Veterinary Institute (National Residue Control Laboratory) located in Bet Dagan is a government laboratory conducting analytical testing of field samples for the

national residue testing program and conducts analyses of field samples for *Lm* and *Salmonella* in RTE product.

The Bactochem Laboratories Ltd., located in Ness Ziona is a private laboratory, which conducts analyses of field samples for the presence of generic *E. coli.* and *Salmonella.*

The following deficiencies were observed:

Residue Laboratory

- Poultry samples for residue testing, standard solutions/reagents/media ingredients were not kept in a sanitary manner in the holding freezers and refrigerators.
- Poultry samples were not kept under proper temperature controls as stated in the written laboratory procedures.
- Accumulations of debris were observed inside and outside all sample holding freezers and refrigerators.
- Rubbish was observed on the floor in the chemical store room where two freezers were kept.
- Monitoring temperature records were not maintained weekly for freezers and refrigerators as stated in the written laboratory procedures.
- Temperature deviations (from the required temperature -18C + or - 8C to – 0 C) occurred numerous times between July 7 and December 19, 2005, in the antibiotics sampling storage freezer. The Quality Coordinator did not take corrective actions.
- Expired standards for organophosphates (Diazinon) in February 2005, and antibiotics (the CHARM screening method) in April, 2005, were being used.

Microbiology Laboratory

- The sample size for *Salmonella* testing was 25 grams instead of 325 grams as required by FSIS.
- The laboratory was using a method that has not been determined to be equivalent to analyze for *Salmonella* in RTE product.
- The laboratory did not comply with internal written procedures to perform one internal audit yearly.
- No intra-laboratory and/or inter-laboratory check samples were performed for *Salmonella* species and generic *E. coli* this year.

9. SANITATION CONTROLS

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

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States domestic

inspection program. The SSOP in all ten establishments were not effectively implemented. The following deficiencies were observed:

- In one establishment, daily monitoring of operational sanitation was not conducted for the second shift operations.
- In two establishments, there were no records to demonstrate that the establishments had been routinely evaluating the effectiveness of SSOP in preventing direct contamination or adulteration of products.
- In all ten establishments, corrective actions did not address either preventive measures or procedures to ensure the appropriate disposition of products that could be contaminated.
- In all ten establishments, observed SSOP non-compliances were not addressed and corrective actions were not documented by establishment officials.
- In two establishments, dripping condensate from overhead structures and ceilings was falling onto exposed products and/or food-contact surfaces in the carcass chillers, shipping rooms, and slaughter rooms.
    - For example, in one of these two establishments, black discoloration and debris were observed on food-contact surfaces in the chlorinated water tank.
- In two of the ten establishments, turkey carcasses were in direct contact with contaminated surfaces, e.g., employees' boots, platforms, floors, rack wheels, and rusty pipes.
- In two establishments, the trimmers' metal mesh gloves in the slaughter rooms were not adequately sanitized between carcasses after being contaminated.
- In six establishments, product residues from previous days' operations were observed on food-contact surfaces.

Specific deficiencies are noted in the attached Foreign Establishment Audit Checklists.

9.2 Sanitation

The following deficiencies were noted:

- Eight establishments did not meet FSIS sanitation requirements.
- In six establishments, facilities were not properly maintained either to prevent conditions that could lead to insanitary conditions or to preclude the entrance of flies, rodents, and other vermin.
    - For example, in one of these six establishments, pipes for the overflow of water and air venting in the potable water tank were not protected to prevent the entrance of insects and rodents.
- In three establishments, beaded condensation was observed on ceilings in the carcass chillers, de-boning rooms, and giblet harvesting areas.
- In one establishment, rodenticides were spilled on the floor and could have resulted in contamination of packaging materials stored in the dry storage room.
- In six establishments, plastic strip curtains on doors between production rooms had a buildup of product residue from previous use and were contacting

and cross contaminating employees' boots, clean garments, aprons, clean containers, and racks for edible products.

- In three establishments, employees working in contact with product did not adhere to hygienic practices to prevent cross-contamination of product.
    - For example, several employees in the turkey packing room were observed picking-up trash from the floor and, without washing their hands, handling edible product; an employee was using a dirty water nozzle to wash a turkey carcass that was contacting the floor drain at the turkey carcass salvage station; and an employee picked up fallen packaging materials from the floor and used them for edible product in the poultry de-boning room.
- In two establishments, exposed and deteriorated insulation was observed on air ducts, loose metal panels were seen on walls, and flaking paint and loose silicone sealant were found on walls and ceilings in the processing room, turkey carcass chiller and freezer. Any of these conditions posed a risk of contamination of edible product.
- In one establishment, pipes for the overflow of water and air venting in the potable water tank were not protected to prevent the entrance of insects, rodents, and other vermin.
- In six establishments, metal tables and other equipment in the de-boning, processing, and slaughter rooms were observed with open seams and rough cracked edges. This could allow residues from previous operations, providing a haven pathogen growth to contaminate edible product.
- In one establishment, edible and inedible product containers were not identified to prevent adulteration of product and were cross-utilized.

Specific deficiencies are noted in the attached Foreign Establishment Audit Checklists.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, humane handling and humane slaughter, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Israel's inspection system had adequate controls in place.

Restrictions are placed on Israel's fresh poultry due to the presence of Exotic Newcastle Disease.

11. SLAUGHTER/PROCESSING CONTROLS

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

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

11.1 HACCP Implementation.

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

The HACCP programs were reviewed during the on-site audits of the ten establishments. All ten establishments had not adequately implemented the HACCP requirements.

- In all ten establishments, written HACCP plans in the establishment did not identify the corrective actions to be taken in response to a deviation from a CL.
- In one establishment, ongoing verification procedures did not include direct observation of monitoring activities or corrective actions.
- In one establishment, the calibration of process-monitoring instruments was not performed weekly and annually as stated in the written HACCP plan.
- In one establishment a deviation from CL occurred, but the establishment did not document corrective actions taken in response to the deviation.
- In seven establishments, HACCP records documenting the monitoring of CCP did not include the initials or signature of the person performing the monitoring or the recording of the actual values observed during the monitoring process.

Specific deficiencies are noted in the attached Foreign Establishment Audit Checklists.

11.2 Testing for Generic *E. coli*

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

Israel has adopted the FSIS regulatory requirements for generic *E. coli* testing with the following exception:

- Testing for generic *E. coli* is conducted at government laboratories.

Under this determination, FSIS stated that 1) the laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record keeping facilities and 2) the results of analyses including all permanently recorded data and summaries are reported promptly to the establishment.

Testing for generic *E. coli* was not properly conducted in any of the six slaughter establishments. The following deficiencies were observed:

- Government inspectors collected the samples.
- The results of the tests for generic *E. coli* were not routinely shared with the establishments where the samples were taken. The establishments were only informed of non-compliant results and therefore could not properly monitor their slaughter process.

11.3 Testing for *Listeria monocytogenes*

Four of the ten establishments audited were producing RTE products for export to the United States. In accordance with United States requirements, the HACCP plans in these establishments had been reassessed to include *Lm* as a hazard reasonably likely to occur.

Lm testing was being performed, as required, in all of the establishments that are producing RTE products.

12. RESIDUE CONTROLS

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

The Kimron Veterinary Institute is a government laboratory that acts as the national residue control laboratory.

The following deficiencies were observed:

- Poultry samples for residue testing, standard solutions/reagents/media ingredients were not kept in a sanitary manner in the holding freezers and refrigerators.
- Poultry samples were not kept under proper temperature controls as stated in the written laboratory procedures.
- Accumulations of debris were observed inside and outside all sample holding freezers and refrigerators.
- Rubbish was observed on the floor in the chemical store room where two freezers were kept.
- Monitoring temperature records were not maintained weekly for freezers and refrigerators as stated in the written laboratory procedures.
- Temperature deviations (from the required temperature -18C + or - 8C to – 0 C) occurred numerous times between July 7 and December 19, 2005, in the antibiotics sampling storage freezer. The Quality Coordinator did not take corrective actions.
- Expired standards for organophosphates (Diazinon) in February 2005, and antibiotics (the CHARM screening method) in April, 2005, were being used.

Israel's National Residue Testing Plan for 2005 was being followed and was on schedule.

13. ENFORCEMENT CONTROLS

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

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments. However, in one establishment VSAH did not conduct government inspection oversight activities for the products produced during the second shifts. The auditor could not determine, based on a review of the records, whether or not the establishment was producing product for the United States. This establishment was not exporting any product to the U.S. at the time of this audit but intends to export in the foreseeable future.

13.2 Testing for *Salmonella*

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

Testing for *Salmonella* was conducted in all six establishments. Previously, Israel had adopted the FSIS regulatory requirements for testing *Salmonella*. During the audit, the auditor discovered that *Salmonella* samples were being sent to private laboratories instead of government laboratories. Israel had not submitted this change for an equivalence review by FSIS.

During laboratory audits, emphasis was placed on the application of procedures and standards that are equivalent to United States requirements. The auditor reviewed two laboratories that perform *Salmonella* testing on product that is exported to the United States.

The Kimron Veterinary Institute, a government laboratory, was conducting *Salmonella* testing on U.S. destined RTE product. The following deficiencies were observed.

- The sample size for *Salmonella* testing was 25 grams instead of 325 grams as required by FSIS. The smaller sampling size reduces the probability of finding *Salmonella*.
- The laboratory was using a method that has not been determined to be equivalent to analyze for *Salmonella* in RTE product.

The Bactochem Laboratories Ltd., a private laboratory, was conducting *Salmonella* performance standards testing on U.S. destined product. The following deficiencies were observed:

- The laboratory did not comply with internal written procedures to perform one internal audit yearly.

- No intra-laboratory and/or inter-laboratory check samples were performed for *Salmonella* species and generic *E. coli* this year.

13.3 Species Verification

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

13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly supervisory reviews of certified establishments were not being performed and documented as required. VSAH officials did not demonstrate that they have effective oversight that would facilitate accountability of the DVO inspection officials and effective supervision of inspection activities at the establishment level.

- In reviews that were conducted, the supervisory reviews did not adequately address the inspection oversight activities of inspectors at the establishment level.
- The recent supervisory reviews of all establishments that were delisted or received an NOID during this audit had indicated compliance regarding the SSOP and HACCP requirements.
- No procedures were in place for trend analysis of monthly reviews to determine enforcement action options for re-occurring non-compliances.

13.5 Inspection System Controls

In all ten establishments audited, inspection system controls failed to properly recognize and fully enforce FSIS requirements.

14. CLOSING MEETING

A closing meeting was held on December 22, 2005 in Bet Dagan with the CCA. At this meeting, the preliminary audit findings were presented by the auditor.

15. CONCLUSION

FSIS has concluded that based on the findings of this audit Israel is not maintaining an inspection system equivalent to that of the United States. Israel was requested to voluntarily suspend exports of poultry products to the United States in lieu of a suspension by FSIS. FSIS will conduct an on-site audit of Israel's inspection system upon notification from Israel that corrective actions have been taken to assure compliance with the U.S. import inspection requirements. Israel can resume exports to the United States following FSIS' verification of corrective actions.

Dr. Faizur Choudry
Senior Program Auditor

Manzoor H. Choudry

16. ATTACHMENTS

Individual Foreign Establishment Audit Forms
Foreign Country Response to Draft Final Audit Report *(no comments received)*

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Maof Ltd. Beer Tuvia	11/29/2005	003	Israel
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	X
28. Sample Collection/Analysis	X
29. Records	X
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

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

60. Observation of the Establishment

Establishment # 003 Date 11/29/2005 Slaughter and processing operation

10. A) Edible product was contacting contaminated racks through the perforated bottoms of plastic containers in the boning room. **B)** One employee was observed picking up a piece of meat from the floor and adding it to edible product, cross-contaminating the product). 9 CFR 416.5(a)
9 CFR 416.15

10/51. Turkey carcasses were contacting an employees' work platform and boots, the floor, and rack wheels at the carcass re-hang station in the boning room. 9 CFR 416.15 and 416.17

13/51. The daily pre-operational and operational sanitation SSOP monitoring records were not specifying the deficiencies identified and were not verifying the corrective actions taken to ensure appropriate disposition of products that may be contaminated and prevent recurrence of direct product contamination or adulteration for pre-operational and operational sanitation. 9 CFR 416.16 and 416.17

20/51. In the written HACCP plan, the establishment did not identify these corrective actions to be followed in response to a deviation from a critical limit: 1) the cause of deviation is identified and eliminated and 2) the CCP will be under control after the corrective action is taken. 9 CFR 417.3(a)(1)(2) and 417.8

22/51. The records to document the monitoring of Critical Control Points (CCP) did not record the actual observations (8 turkey carcasses were observed during CCP monitoring activities but only one observation was recorded). 9 CFR 417.5

27/28/29/51 FSIS has granted an equivalence determination allowing Israel to use government laboratories for generic *Escherichia coli* (*E. coli*) testing but Veterinary Services and Animal Health (VSAH), Department Control of Animal Product (DCAP) changed the protocol without submitting it to OIA, FSIS for equivalence determination: the government inspectors collect the samples and send them to *private* laboratories. The results of these tests are controlled by the inspection officials and the establishment is notified only for noncompliant results. 9 CFR 381.94

39/51.a) Gaps below and at the sides of doors were not sealed properly to prevent the entry of vermin in the shipping and slaughter rooms. b) Gaps below and at the sides of sides of doors in the dry storage room for the packaging materials were not sealed properly to prevent the entry of vermin. 9 CFR 416.2 (b)

41/51. Beaded condensation was observed on ceilings in one chiller where exposed product was stored. No dripping from the ceilings was observed. 9 CFR 416.2 (d)

45/51 A) Numerous metal tables and other equipment with open seams and rough cracked edges were observed in the de-boning and slaughter rooms. B) Plastic strip curtains on doors between production rooms were contacting and cross contamination employees' boots, clean garments, aprons, clean containers, and racks for edible products. 9 CFR 416.5 and 416.17

51.a) Government of Israel (GOI) meat inspection officials were not specifying the deficiencies identified and were not verifying the corrective actions taken to ensure appropriate disposition of products that could be contaminated and prevent recurrence of direct product contamination or adulteration for pre-operational and operational sanitation SSOP. During the monthly supervisory reviews, the corrective actions taken by the establishment were not verified for the deficiencies identified. 9 CFR 416.17

57/51.a) The supervisory audits were not conducted monthly. 9 CFR 381.196 (iv)(A)

b) There was no indication of any findings in the supervisory monthly records concerning the aforementioned SSOP and HACCP non-compliances. 9 CFR 416.17 & 417.8

58/51. Israel's *Salmonella* testing is declared to be the same as in the U.S., but VSAH/DCAP changed the protocol without submitting the changed criteria to OIA, FSIS for equivalency determination: *Salmonella* samples are being sent to private laboratories. 9 CFR 381.94

59. GOI poultry inspection officials issued a Notice of Intent to Delist (NOID) to Establishment 003 for inadequate implementation of Sanitation Standard Operating Procedures (SSOP), Sanitation Performance Standards (SPS), Hazard Analysis and Critical Control Points (HACCP) and Government Oversight Enforcement requirements, effective November 29, 2005. GOI inspection officials are to evaluate the adequacy of corrective actions and provide a full report to FSIS.

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
12/25/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Milouoff Poultry Integration Agricultural Cooperative Society Ltd Oshrat	12/06/2005	005	ISRAEL
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Faizur R. Choudry, DVM	[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	X
28. Sample Collection/Analysis	X
29. Records	X
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

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

80. Observation of the Establishment

Establishment # 005 Date: 12/06/2005 Slaughter & Processing Operation

10 A) Rust and flaking paint were observed on food-contact surfaces in the ice and salt chutes. 9 CFR 416.15
B) Mesh gloves used by the trimmers on the slaughter floor were not sanitized between carcasses after becoming contaminated. 9 CFR 416.15
13/51. The daily pre-operational and operational sanitation monitoring records did not specify the deficiencies identified and dud not document the corrective actions taken either to ensure appropriate disposition of products that might be contaminated or to prevent the recurrence of direct product contamination or adulteration. 9 CFR 416.16 and 416.17
20/51. In the establishment's written HACCP plan, the corrective actions to be followed in the event of a deviation from a critical limit did not include: 1) the cause of deviation is identified and eliminated and 2) the CCP will be under control after the corrective action is taken. 9 CFR 417.3(a)(1)(2) and 417.8
22/51.a) The records documenting the monitoring of Critical Limits (CLs) did not contain the actual observations; e.g., 10 chicken carcasses were observed during CCP monitoring activities but only one observation was recorded. Also, the entries were not initialed or signed. 9 CFR 417.5 and 417.8
27,28,29/51. FSIS has granted an equivalence determination allowing Israel to use government laboratories for generic *Escherichia coli* (*E. coli*) testing but Veterinary Services and Animal Health (VSAH), Department Control of Animal Product (DCAP) changed the protocol without submitting it to OIA, FSIS for equivalence determination: the government inspectors collect the samples and send them to *private* laboratories. The results of these tests are controlled by the inspection officials and the establishment is notified only for noncompliant results. 9 CFR 381.94
39./51. Gaps at the bottoms and sides of doors and numerous holes in the walls in the dry storage room for the packaging materials were not sealed properly to prevent the entry of rodents and other vermin. 9 CFR 416.2 (b) and 416.17
45/51 Metal tables and other equipment with open seams and rough cracked edges were observed in the slaughter, de-boning, and offal rooms. 9 CFR 416.15 and 416.17
41/51. Beaded condensation was observed on ceilings in the de-boning room and giblet harvesting area. 9 CFR 416.2(d)
47/51. Plastic strip curtains on doors to production rooms had buildups of product residue and were contacting and cross contaminating employees' boots, clean garments, aprons, and clean containers for edible products. 9 CFR 416.5(a) and 416.17
51. A) Meat inspection officials did not specify the deficiencies identified and did not verify the corrective actions taken, either to ensure the appropriate disposition of products that could be contaminated or to prevent recurrence of direct product contamination or adulteration, in their documentation of pre-operational and operational sanitation inspection. **B)** During the monthly supervisory reviews, the corrective actions taken by the establishment for the deficiencies identified were not verified. 9 CFR 416.17
57/51. A) The supervisory audits were not conducted monthly. 9 CFR 381.196 (iv)(A) **B)** There was no indication of any findings in the supervisory monthly records concerning the aforementioned SSOP and HACCP non-compliances. 9 CFR 416.17 & 417.8
58/51. Israel's *Salmonella* testing is declared to be the same as that of the U.S.. but VSAH/DCAP changed the protocol without submitting it to OIA, FSIS for equivalence determination: *Salmonella* samples are being sent to private laboratories. 9 CFR 381.94

59 Following a review of the findings by FSIS, this establishment was served with a Notice of Intent to Delist. Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

81. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

82. AUDITOR SIGNATURE AND DATE
12/25/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Off-Tov (Shan) Hodu Tov (Shan) Ltd. Bet -Shean	12/05/2005	008	ISRAEL
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Faizur R. Choudry, DVM	[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	X
28. Sample Collection/Analysis	X
29. Records	X
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

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

60. Observation of the Establishment

Establishment # 008 Date: 12/05/2005 Slaughter & Processing Operation

10. Black discoloration and debris were observed on food-contact surfaces in the chlorinated water tank. 9 CFR 416.15
13/51. The daily pre-operational and operational sanitation monitoring records did not specify the deficiencies identified and did not verify that corrective actions were taken to ensure the appropriate disposition of products that could be contaminated or to prevent recurrence of direct product contamination or adulteration. 9 CFR 416.16 and 416.17
20/51. In the establishment's written HACCP plan, the corrective actions to be followed in response to a deviation from a critical limit did not include: 1) the cause of deviation is identified and eliminated; 2) the CCP will be under control after the corrective action is taken; and 3) measures to prevent recurrence are established. 9 CFR 417.3(a)(1)(2)(3) and 417.8
22/51. The records to document the monitoring of Critical Limits (CL) did not include the actual observations, e.g., 10 chicken carcasses were observed during CCP monitoring activities but only one observation was recorded. 9 CFR 417.5 and 417.8
27,28,29/51 FSIS granted an equivalence determination allowing Israel to use government laboratories for generic *Escherichia coli* (*E. coli*) testing, but Veterinary Services and Animal Health (VSAH), Department Control of Animal Product (DCAP) changed the protocol without submitting it to OIA, FSIS for equivalence determination: The government inspectors collect the samples and send them to private laboratories. The results of these tests are controlled by the inspection officials and the establishment is notified only for noncompliant results. 9 CFR 381.94
39./51. Gaps below and beside doors, windows without screens, open spaces between walls and ceilings, and holes around metal panels in the dry storage room for the packaging materials were not sealed to prevent the entry of rodents and other vermin. 9 CFR 416.2 (b)
41/51. Beaded condensation was observed in the turkey carcass chiller and above the giblet harvesting area. CFR 416.2(d)
45/51.A) Metal tables and other equipment with open seams and rough cracked edges were observed in the slaughter, de-boning, and offal rooms. 9 CFR 416.15 **B)** Plastic containers for inedible and edible product were not identified as such and were cross-utilized. 9 CFR 416.3(c) and 416.17
47/51.A) Plastic strip curtains on doors to production rooms had buildups of product residue and were contacting and cross contaminating employees' boots, clean garments, aprons, and clean containers for edible products. 9 CFR 416.5(a) and 416.17 **B)** Two employees in the turkey de-boning room were observed sweeping the floor and, without washing their hands, handling edible product and edible product containers. 9 CFR 416.5(a)
51. In the monthly supervisory reviews, the deficiencies identified were not verified by the inspection officials for corrective actions taken by the establishment. 9 CFR 416.17
57/51.a) The supervisory audits were not conducted monthly. 9 CFR 381.196 (iv)(A)
b) There was no indication of any findings in the supervisory monthly records concerning the aforementioned SSOP and HACCP non-compliances. 9 CFR 416.17 & 417.8
58/51. Israel's *Salmonella* testing is declared to be the same as that of the U.S.. but VSAH/DCAP changed the protocol without submitting it to OIA, FSIS for equivalence determination: S*almonella* samples are being sent to private laboratories. 9 CFR 381.94

59 Following a review of the findings by FSIS, this establishment was served with a Notice of Intent to Delist. Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
12/25/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Off Hagalil Ltd. Kiryat Shmona	11/30/2005	009	Israel
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	X
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	X
28. Sample Collection/Analysis	X
29. Records	X
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

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

60. Observation of the Establishment

Establishment # 009 Date: 11/30/2005 Slaughter & Processing Operation

10. Condensate from overhead pipes and ceilings that was not cleaned/sanitized daily was falling onto chicken carcasses in the slaughter room and onto gizzards in the giblet harvesting area. 9 CFR 416.14

10/51.A) Automatic chicken carcass conveyor shackles were found with blood, fat, and grease at the re-hang station for evisceration line. **B)** Fat, meat particles, and black discoloration were observed on food-contact surfaces of containers ready for use in the de-boning room. **C)** Dripping condensate, from overhead ceilings that were not cleaned/sanitized daily, was falling onto cleaned product-contact containers ready for use in the equipment washing room. **D)** Dust, rust, and grease was observed on a container for dispensing salt, and a conveyor mechanism for kosher salt was not properly protected to prevent adulteration of the salt. Also, this room was not protected to prevent the entry of vermin. 9 CFR 416.15 and 416.17

11/51. Establishment officials were not routinely evaluating the adequacy and effectiveness of the Sanitation Standard Operating Procedures (SSOP) to prevent direct product contamination. 9 CFR 416.14 and 416.17

13/51. The daily pre-operational and operational sanitation monitoring records did not specify the deficiencies identified and did not verify that corrective actions were taken to ensure the appropriate disposition of products that could be contaminated or to prevent recurrence of direct product contamination or adulteration. 9 CFR 416.16 and 416.17

20/51. In the establishment's written HACCP plan, the corrective actions to be followed in response to a deviation from a critical limit did not include: 1) the cause of deviation is identified and eliminated; 2) the CCP will be under control after the corrective action is taken; and 3) measures to prevent recurrence are established. 9 CFR 417.3(a)(1)(2)(3) and 417.8

22/51. The records documenting the monitoring of Critical Limits (CL) did not include the actual observations, e.g., 10 chicken carcasses were observed during CCP monitoring activities but only one observation was recorded. 9 CFR 417.5 and 417.8

27,28.29/51. FSIS granted an equivalence determination allowing Israel to use government laboratories for generic *Escherichia coli* (*E. coli*) testing, but Veterinary Services and Animal Health (VSAH), Department Control of Animal Product (DCAP) changed the protocol without submitting it to OIA, FSIS for equivalence determination: The government inspectors collect the samples and send them to private laboratories. The results of these tests are controlled by the inspection officials and the establishment is notified only for noncompliant results. 9 CFR 381.94

38/51. Rodenticides were spilled on the floor and were used in a manner caused insanitary conditions in the dry storage room for the packaging materials. 9 CFR 416.2 (a)

39/51.A) A buildup of dust, debris, and cobwebs was observed in the dry storage room. Some packaging materials were not stored on racks; some racks were not high enough or far enough from walls to permit monitoring of pest control and sanitation programs. Tables used to assemble cardboard boxes were found with dirt, grease and numerous deteriorated labels sticking to their surfaces. **B)** Gaps at the bottoms and sides of doors in the slaughter rooms, shipping room, equipment washing room, and dry storage room for the packaging materials were not sealed properly to prevent the entry of vermin. 9 CFR 416.2(b) and 416.17

45. Metal tables and other equipment with open seams were observed in the de-boning and slaughter rooms. 9 CFR 416.3(a) and 416.17

47/51. Plastic strip curtains on doors to production rooms had buildups of product residue and were contacting and cross contaminating employees' boots, clean garments, aprons, and clean containers for edible products. 9 CFR 416.5(a) and 416.17

51. A) Meat inspection officials did not specify the deficiencies identified and did not verify the corrective actions taken, either to ensure the appropriate disposition of products that could be contaminated or to prevent recurrence of direct product contamination or adulteration, in their documentation of pre-operational and operational sanitation inspection. **B)** During the monthly supervisory reviews, the corrective actions taken by the establishment for the deficiencies identified were not verified. 9 CFR 416.17

57/51.A) Supervisory audits were not conducted monthly. 9 CFR 381.196 (iv)(A)

b) There was no indication of any findings in the supervisory monthly records concerning the aforementioned SSOP and HACCP non-compliances. 9 CFR 416.17 & 417.8

58/51. Israel's *Salmonella* testing is declared to be the same as that of the U.S., but VSAH/DCAP changed the protocol without submitting it to OIA, FSIS for equivalence determination: *Salmonella* samples were being sent to private laboratories. 9 CFR 381.94

59. Due to non-compliance with implementation the requirements of SSOP, SPS, HACCP programs and lack of enforcement by the GOI poultry inspection officials, this establishment did not meet FSIS requirements. All the above deficiencies were discussed with GOI poultry inspection officials and they agreed to remove Establishment 009 from the list of establishments eligible to export poultry and poultry products to the United States, effective November 30, 2005.

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

12/25/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Hod Hefer Ltd Industrial Zone, St Beit Harishonim Emek Hefer	12/07/2005	018	Israel
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	X
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	X
28. Sample Collection/Analysis	X
29. Records	X
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

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

60. Observation of the Establishment

Establishment # 018 Date: 12/07/2005 Slaughter & Processing Operation

10. Condensate from overhead pipes and ceilings that were not cleaned/sanitized daily, was falling onto chicken and turkey carcasses and onto exposed product in the chillers, holding product chiller, the turkey shipping room, and the slaughter room.

10/51.A) Contaminated water was dripping from electrical cables onto product in the de-boning room. **B)** Contaminated water was dripping from an automatic chicken carcass conveyor chain and from shackles onto exposed product in the de-boning room. **C)** Turkey carcasses were contacting dirty and rusty pipes in the carcass chiller. **D)** Mesh gloves used by the trimmers at the post-mortem inspection station were not sanitized between carcasses after becoming contaminated. **E)** Contaminated water from a hand washing facility was falling onto edible spleens at the spleen harvesting station in the poultry slaughter room. 9 CFR 416.15 and 416.17

11/51. Establishment officials were not routinely evaluating the adequacy and effectiveness of the Sanitation Standard Operating Procedures (SSOP) to prevent direct product contamination. 9 CFR 416.14

13/51. The daily pre-operational and operational sanitation monitoring records did not specify the deficiencies identified and did not verify the corrective actions taken to ensure appropriate disposition of products that could be contaminated or to prevent the recurrence of direct product contamination or adulteration. 9 CFR 416.16 nad 416.17

20/51. In the establishment's written HACCP plan, the corrective actions to be taken in response to a deviation from a critical limit did not include: 1) the cause of deviation is identified and eliminated; 2) the CCP will be under control after the corrective action is taken; and 3) measures to prevent recurrence are established. 9 CFR 417.3(a)(1)(2)(3)

22/51.A) The records to document monitoring of Critical Limits (CL) did not document the actual observations; e.g., 10 chicken carcasses were observed during CL monitoring activities but only one observation was recorded. 9 CFR 417.5 and 417.8

B) In response to a deviation from the CL for zero visible fecal tolerance, corrective actions taken did not: 1) identify and eliminate the cause of the deviation; 2) include measures to ensure that the CCP was brought under control; 3) include measures to prevent the deviation from recurring, and 4) include the appropriate disposition of the product. 9 CFR 417.3(a (1)(2)(3)(4)

27,28.29/51. FSIS granted an equivalence determination allowing Israel to use government laboratories for generic *Escherichia coli* (*E. coli*) testing, but Veterinary Services and Animal Health (VSAH), Department Control of Animal Product (DCAP) changed the protocol without submitting it to OIA, FSIS for equivalence determination: The government inspectors collect the samples and send them to private laboratories. The results of these tests are controlled by the inspection officials and the establishment is notified only for noncompliant results. 9 CFR 381.94

39/51.a) Gaps at the bottoms and sides of doors in the chicken and turkey shipping rooms and dry storage room for the packaging materials were not sealed properly to prevent the entry of vermin. One entrance in the chicken and two in the turkey shipping rooms had no doors. b) Pipes for the overflow of water and air venting in the potable water tank were not protected to prevent the entrance of insects and rodents. c) Exposed and deteriorated insulation was observed on ducts in the turkey chiller and numerous metal panels were loose in the turkey freezer. 9 CFR 416.2 (b)

45. Metal tables and other equipment with open seams were observed in the de-boning and slaughter rooms. 9 CFR 416.4

47/51. Several employees in the turkey packing room were observed picking-up trash from the floor and, without washing their hands, handling edible product. Another employee was using a dirty water nozzle to wash a turkey carcass that was contacting the floor drain at the turkey carcass salvage station. A third employee picked up fallen packaging materials from the floor and used them for edible product in the poultry de-boning room. 9 CFR 416.5

51. A) Meat inspection officials were not specifying the deficiencies identified and were not verifying the corrective actions taken to ensure appropriate disposition of products that could be contaminated or to prevent the recurrence of direct product contamination or adulteration for pre-operational and operational sanitation. B) In the monthly supervisory reviews, the corrective actions taken by the establishment were not verified for the deficiencies identified. 9 CFR 416.17

57/51.a) Only two monthly supervisory audits had been conducted in 2005. 9 CFR 381.196 (iv)(A)

b) There was no indication of any findings in the monthly supervisory review records concerning the aforementioned SSOP and HACCP non-compliances. 9 CFR 416.17 & 417.8

58/51. Israel's *Salmonella* testing is declared to be the same as that of the U.S.. but VSAH/DCAP changed the protocol without submitting it to OIA, FSIS for equivalence determination: *Salmonella* samples are being sent to private laboratories. 9 CFR 381.94

59. Due to non-compliance with implementation the requirements of SSOP, SPS, HACCP programs and lack of enforcement by the GOI poultry inspection officials, this establishment did not meet FSIS requirements. All the above deficiencies were discussed with GOI poultry inspection officials and they agreed to remove Establishment 009 from the list of establishments eligible to export poultry and poultry products to the United States, effective December 7, 2005.

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
12/15/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Soglowek (Shlomi) Ltd. Shlomi	12/01/2005	019	ISRAEL
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Faizur R. Choudry, DVM	[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	X
28. Sample Collection/Analysis	X
29. Records	X
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

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

80. Observation of the Establishment

Establishment # 019 Date: 12/01/2005 Slaughter & Processing Operation

10/51. Fat, meat particles, and grease were observed on food-contact surfaces of conveyor belts and other equipment ready for use in the poultry cut-up room. 9 CFR 416.15

13/51. The daily pre-operational and operational sanitation monitoring records did not specify the deficiencies identified and did not verify that corrective actions were taken to ensure the appropriate disposition of products that could be contaminated or to prevent recurrence of direct product contamination or adulteration. 9 CFR 416.16 and 416.17

22/51. The records documenting the monitoring of Critical Limits (CL) did not include the actual observations, e.g., 10 chicken carcasses were observed during CCP monitoring activities but only one observation was recorded. 9 CFR 417.5 and 417.8

27,28,29/51. FSIS granted an equivalence determination allowing Israel to use government laboratories for generic *Escherichia coli* (*E. coli*) testing, but Veterinary Services and Animal Health (VSAH), Department Control of Animal Product (DCAP) changed the protocol without submitting it to OIA, FSIS for equivalence determination: The government inspectors collect the samples and send them to private laboratories. The results of these tests are controlled by the inspection officials and the establishment is notified only for noncompliant results.. 9 CFR 381.94

45. Metal tables and other equipment with open seams were observed in the de-boning and slaughter rooms. 9 CFR 416.15 and 416.17

47/51. Plastic strip curtains on doors to production rooms had buildups of product residue and were contacting and cross contaminating employees' boots, clean garments, aprons, and clean containers for edible products. 9 CFR 416.5(a) and 416.17

51. A) Meat inspection officials did not specify the deficiencies identified and did not verify the corrective actions taken, either to ensure the appropriate disposition of products that could be contaminated or to prevent recurrence of direct product contamination or adulteration, in their documentation of pre-operational and operational sanitation inspection. **B)** During the monthly supervisory reviews, the corrective actions taken by the establishment for the deficiencies identified were not verified. 9 CFR 416.17

57/51.a) The supervisory audits were not conducted monthly. 9 CFR 381.196 (iv)(A) **b)** There was no indication of any findings in the supervisory monthly records concerning the aforementioned SSOP and HACCP non-compliances. 9 CFR 416.17 & 417.8

58/51. Israel's *Salmonella* testing is declared to be the same as that of the U.S., but VSAH/DCAP changed the protocol without submitting it to OIA, FSIS for equivalence determination: *Salmonella* samples were being sent to private laboratories. 9 CFR 381.94

59 Following a review of the findings by FSIS, this establishment was served with a Notice of Intent to Delist. Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

81. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

82. AUDITOR SIGNATURE AND DATE
12/25/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
TIV-TIRAT TZVI Meat Specialties M.P. Beit Shear Valley	12/08/2005	022	ISRAEL
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

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

60. Observation of the Establishment

Establishment # 022 Date 12/08/2005 Processing Operation

13/51. The daily pre-operational and operational sanitation monitoring records did not specify the deficiencies identified and did not verify that corrective actions were taken to ensure the appropriate disposition of products that could be contaminated or to prevent recurrence of direct product contamination or adulteration. 9 CFR 416.16 and 416.17

20/51. In the establishment's written HACCP plan, the corrective actions to be followed in the event of a deviation from a critical limit did not include: 1) the cause of deviation is identified and eliminated; 2) the CCP will be under control after the corrective action is taken; and 3) measures to prevent recurrence are established. 9 CFR 417.3(a)(1)(2)(3)

51.a) A) Meat inspection officials did not specify the deficiencies identified and did not verify the corrective actions taken, either to ensure the appropriate disposition of products that could be contaminated or to prevent recurrence of direct product contamination or adulteration, in their documentation of pre-operational and operational sanitation inspection. **B)** During the monthly supervisory reviews, the corrective actions taken by the establishment for the deficiencies identified were not verified. 9 CFR 416.17

57/51.a) Only two monthly supervisory reviews were conducted since January 2005. 9 CFR 381.196 (iv)(A)

b) There was no indication of any findings in the supervisory monthly review reports concerning the aforementioned SSOP and HACCP non-compliances. 9 CFR 416.17 & 417.8

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
12/25/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Yehiam Meat Products Kibbutz Yehiam	12/13/2005	104	ISRAEL
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

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

60. Observation of the Establishment

Establishment # 104 Date 12/13/2005 Processing Operation

10/51. Establishment officials were not documenting any operational sanitation activities for the 2nd shift operations. 9 CFR 416.13 (a)(b)(c) and 416.17

13/51. The daily pre-operational and operational sanitation SSOP monitoring records did not document preventive measures taken when direct product contamination or adulteration was identified. 9 CFR 416.16 and 416.17

20/51. In the establishment's written HACCP plan, the corrective actions to be followed in the event of a deviation from a critical limit did not include: 1) the cause of deviation is identified and eliminated 2) the CCP will be under control after the corrective action is taken, and 3) measures to prevent recurrence are established. 9 CFR 417.3(a)(1)(2)(3) and 417.8

22/51.A) The records documenting monitoring of Critical Limits were not initialed or signed by the person performing the monitoring. 9 CFR 417.5

B) Establishment officials were not performing either direct observation of the monitoring activities or checking the records for corrective actions during their ongoing verification activities. 9 CFR 417.4 (a)(2)(ii)

51.a) Meat inspection officials were not documenting their monitoring of the establishment's operational sanitation activities for the 2nd shift operation. 9 CFR 416.13(a)(b)(c)

b) Meat inspection officials were not verifying the adequacy of the HACCP program for the 2nd shift operation by reviewing the HACCP plan, CCP records, critical limits, reviewing or determining the adequacy of corrective actions taken when a deviation occurred. 9 CFR 417.8

c) Meat inspection officials did not specify the deficiencies identified and did not verify the corrective actions taken, either to ensure the appropriate disposition of products that could be contaminated or to prevent recurrence of direct product contamination or adulteration, in their documentation of pre-operational and operational sanitation inspection.

57/51.a) Only four monthly supervisory audits were conducted since Janurary 2005. 9 CFR 381.196 (iv)(A)

b) There was no indication of any findings in the monthly supervisory records concerning the aforementioned SSOP and HACCP non-compliances. 9 CFR 416.17 & 417.8

59 Following a review of the findings by FSIS, this establishment was served with a Notice of Intent to Delist. Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
12/25/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Tnuva Galil Kiryat Shmona	12/14/2005	209	ISRAEL
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

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

60. Observation of the Establishment

Establishment # 209 Date 12/14/2005 Processing Operation

12/51. Product residues from the previous day's operations were observed on food-contact surfaces on a roller brush (made of synthetic fibers) in the processing room. 9 CFR 416.15

13/51. The daily pre-operational and operational sanitation SSOP monitoring records for pre-operational and operational sanitation were not documenting the corrective actions taken either to ensure appropriate disposition of products that might have been contaminated or to prevent the recurrence of direct product contamination or adulteration. 9 CFR 416.16 and 416.17

20/51. In the establishment's written HACCP plan, the corrective actions to be followed in the event of a deviation from a critical limit did not include: 1) the cause of deviation is identified and eliminated, 2) the CCP will be under control after the corrective action is taken, and 3) measures to prevent recurrence are established. 9 CFR 417.3(a)(1)(2)(3) and 417.8

22/51. Establishment officials were not verifying corrective actions during their ongoing verification activities. 9 CFR 417.4 (a)(2)(ii) and 417.8

39/51. Flaking paint and loose silicone sealant were observed on the walls and ceilings in the processing room. 9 CFR 416.2(b) and 416.17

51. Meat inspection officials were not verifying the corrective actions taken either to ensure appropriate disposition of products that might have been contaminated or to prevent the recurrence of direct product contamination or adulteration, for either pre-operational or operational sanitation. 9 CFR 416.17

57/51.A) Only two monthly supervisory reviews had been conducted since January 2005. 9 CFR 381.196 (iv)(A)

B) There was no indication of any findings in the supervisory monthly review records concerning the aforementioned SSOP and HACCP non-compliances. 9 CFR 416.17 & 417.8

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
12/25/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Mevushelet-C.I.P. Ltd. M.P. Shimson	12/12/2005	223	ISRAEL
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Faizur R. Choudry, DVM	[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

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

60. Observation of the Establishment

Establishment # 223 Date 12/12/2005 Processing Operation

13/51. The daily pre-operational and operational sanitation monitoring records did not specify the deficiencies identified and dud not document the corrective actions taken either to ensure appropriate disposition of products that might be contaminated or to prevent the recurrence of direct product contamination or adulteration. 9 CFR 416.16 and 416.17

19/51. In the establishment's written HACCP plan, the description of the ongoing verification activities did not include verification of corrective actions. 9 CFR 417.4 (a)(2) (ii).

20/51. In the establishment's written HACCP plan, the description of the corrective actions to be taken in the event of a deviation from a critical limit did not include: 1) the cause of deviation is identified and eliminated 2) the CCP will be under control after the corrective action is taken and 3) measures to prevent recurrence are established. 9 CFR 417.3(a)(1)(2)(3)

22/51. The calibration of process-monitoring instruments was not performed weekly and annually as stated in the HACCP plan. 9 CFR 417.4 (a)(2)(i).

47/51. Plastic strip curtains on doors to production rooms had buildups of product residue and were contacting and cross contaminating employees' boots, clean garments, aprons, and clean containers for edible products. 9 CFR 416.5(a) and 416.17

51. A) Meat inspection officials did not specify the deficiencies identified and did not verify the corrective actions taken, either to ensure the appropriate disposition of products that could be contaminated or to prevent recurrence of direct product contamination or adulteration, in their documentation of pre-operational and operational sanitation inspection. **B)** During the monthly supervisory reviews, the corrective actions taken by the establishment for the deficiencies identified were not verified. 9 CFR 416.17

57/51.A) Only two monthly supervisory audits were conducted since January 2005. 9 CFR 381.196 (iv)(A)

B) There was no indication of any findings in the monthly supervisory review records concerning the aforementioned SSOP and HACCP non-compliances. 9 CFR 416.17 & 417.8

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
Faiz R Choudry 12/25/05

Country Response Not Received