Food Safety and Inspection Service Washington, D.C. 20250

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

AUG 2 2 2007

Dear Mr. Houston:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Northern Ireland's meat inspection system May 22 to May 30, 2007. Comments from Northern Ireland have been included as an attachment to the final report. Enclosed is a copy of the final audit report.

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

Sincerely,

Donald Smart Director

International Audit Staff
Office of International Affairs

Enclosure

FINAL
AUG 2 3 2007

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

MAY 22 through MAY 30, 2007

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 (Food Standard Agency)

CCP Critical Control Point

CVO Chief Veterinary Officer

DARD Department of Agriculture and Rural Development

EC European Commission

E. coli Escherichia coli

FSA Food Standard Agency

FSIS Food Safety and Inspection Service

PR/HACCP Pathogen Reduction/Hazard Analysis and Critical Control Point

Systems

Lm Listeria monocytogenes

NOID Notice of Intent to Delist

OV Official Veterinarian

RVO Regional Veterinary Officer

Salmonella Salmonella species

SPS Sanitation Performance Standards

SSOP Sanitation Standard Operating Procedure(s)

VEA European Community/United States Veterinary Equivalence

Agreement

VPHU Veterinary Public Health Unit

VSG Veterinary Service Group

#### 1. INTRODUCTION

The audit took place in Northern Ireland from May 22 through May 30, 2007.

An opening meeting was held on May 22, 2007 in Belfast 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 Northern Ireland's meat inspection system.

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

## 2. OBJECTIVE OF THE AUDIT

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

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

Competent Authority Visits			Comments
Competent Authority	Central	1	Central office of DARD
			in Belfast
	Divisional	1	DVO regional office in
			Newry (South Region).
	Local	1	Establishment level
Laboratories		0	
Meat Slaughter and Cutting Establishments		1	Cookstown
Processing Establishments		0	

#### 3. PROTOCOL

This on-site audit was conducted in three parts. One part involved visits with CCA and DARD 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, regional and local government offices. The third involved an on-site visit to one swine slaughter and cutting establishment.

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

programs, (4) residue controls, and (5) enforcement controls. Northern Ireland'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 Northern Ireland and determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

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

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

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

• FSIS has determined the use of *Enterobacteriaceae* and Total Viable Count in lieu of testing for generic *E. coli* is acceptable for all EU exporting countries.

## 4. LEGAL BASIS FOR THE AUDIT

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

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

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

- Council Directive 64/433/EEC, of June 1964, entitled "Health Problems Affecting Intra-Community Trade in Fresh Meat"
- Council Directive 96/23/EC, of 29 April 1996, entitled "Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Animal Products"

• Council Directive 96/22/EC, of 29 April 1996, entitled "Prohibition on the Use in Stockfarming of Certain Substances Having a Hormonal or Thyrostatic Action and of β-agonists"

## 5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address: http://www.fsis.usda.gov/Regulations\_&\_Policies/Foreign\_Audit\_Reports/index.asp

The last two audits of Northern Ireland's inspection system have identified several problems.

The following deficiencies were identified during the FSIS audit of Northern Ireland's meat inspection system conducted in May 2005:

- Sanitation Standard Operating Procedure (SSOP) records indicated improper documentation of corrective actions taken in response to product contamination.
- A conveyor belt and a cutting board were improperly maintained. Cracks and grooves were observed, which rendered their product-contact surfaces difficult to clean.
- In several instances, the disposition of product was not documented as part of one establishment's corrective actions taken in response to SSOP deficiencies.
- Gaps/holes, through which rodents or other pests could enter from the outside, were identified in a portion of the shipping area.
- The critical limit (CL) associated with the Critical Control Point (CCP) for carcass chilling was incomplete, as it addressed only surface temperature without a reference to time.
- Salmonella testing on carcasses was performed by a method which had not received equivalence status.
- The CL for CCP #2 (carcass chilling) addressed only the temperature. From a scientific standpoint, the parameters of both time and temperature should be utilized to describe or control the growth of microorganisms.
- Security concerns regarding access to the testing areas were identified (a door at the private laboratory conducting generic *E. coli* testing was left unlocked).

During the most recent audit of Northern Ireland, conducted by FSIS in March/April 2006, the following deficiencies were identified:

- The review of SSOP records indicated several instances of incomplete documentation of corrective actions associated with the procedure for handling damaged product containers.
- The employee monitoring the CCP for visible feces and ingest on carcasses failed to observe the ventral surfaces of the carcasses.

## 6. MAIN FINDINGS

## 6.1 Legislation

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

## 6.2 Government Oversight

## 6.2.1 CCA Control Systems

Northern Ireland's meat inspection system is primarily administered by the Veterinary Service Group (VSG), an agency within DARD. In addition, the Northern Ireland meat Inspection system is under the oversight of the FSA, an agency within the United Kingdom's parliament, which was established to provide food safety oversight for both Great Britain and Northern Ireland. The FSA is the CCA, has an office in Belfast and works closely with DARD. The responsibility of government oversight relative to the United States is shared by two other agencies; one governmental, Central Policy Group, dealing with food safety policy and one non-governmental, Science Service Group, responsible for residue-related issues.

The Veterinary Service (VS) employs a total staff of 825. The meat hygiene controls program in Northern Ireland consists of approximately 30 Official Veterinary Surgeons, 12 Senior Meat Inspectors, 118 Meat Inspectors and 15 Poultry Meat Inspectors. The 22 Meat Inspection Teams are managed by three Divisional Veterinary Officers. Each Meat Inspection Team is managed by an Official Veterinarian (OV) and consists of, in most cases, a Senior Meat Inspector (SMI) and a number of Meat Inspectors (MI), and Official Auxilliaries to carry out the responsibility of its domestic and export meat inspection program including related enforcement activities. All inspection personnel assigned to establishments certified to export meat to the United States (2-OVs, 1 SMI, 15 MI) are full-time government employees receiving no remuneration from either industry or establishment personnel. Inspection personnel cannot attain outside employment.

## 6.2.2 Ultimate Control And Supervision

The Veterinary Service (VS) is headed by a Chief Veterinary Officer (CVO), one Deputy CVO and Director of Logistics. The CVO directly supervises the Veterinary Public Health Unit (VPHU), and the Director of the VPHU oversees three divisional offices (Divisional Veterinary Offices in Coleraine, Newry, and Loughgall). Relative to meat export to the United States, each divisional office is headed by a divisional veterinary officer (circuit supervisor), who provides direct authority over official veterinarians and inspectors assigned to establishments certified to export meat to the United States. Additionally, the VS has authority over live animal matters in Northern Ireland relative to movement controls and livestock diseases.

The OV has the authority to suspend the establishment's production operations any time the wholesomeness and safety of the product is jeopardized. The Official Veterinarians

and inspectors report directly to the DVO and consult on all decisions regarding enforcement activities with the DVO. The decision as to whether the establishment is failing to meet U.S. import requirements, and the recommendation that it should be delisted, is a combined effort of the OV, DVO, and headquarters officials. The CVO will make the ultimate decision and will advise the FSA officials who will delist or suspend the establishment.

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

## 6.2.3 Assignment of Competent, Qualified Inspectors

The auditors observed that competent, qualified inspection personnel were assigned to the establishments eligible to export to the United States. In addition, all inspection personnel working in Northern Ireland's establishments must be fully qualified in accordance with legislative and instructional requirements, meaning that they undergo induction training as well as participate in on-job practical training under the supervision of experienced veterinarians. The Veterinary Service Training Branch maintains individual training records of inspection personnel.

Most of veterinarians are members of the Royal College for Veterinary Surgeons (RCVS). Some have a veterinary degree from other European Universities. The majority of the meat inspectors have received their meat hygiene inspectors' diplomas from the RCVS.

## 6.2.4 Authority and Responsibility to Enforce the Laws

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

## 6.2.5 Adequate Administrative and Technical Support

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

## 6.3 Headquarters Audit

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

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

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

## 6.3.1 Audits of Divisional and Local Inspection Sites

## Divisional Office

One Divisional Veterinary Office was reviewed in Newry. The purpose of the assessment was to review the meat inspection records and determine the level of government oversight and control provided by the divisional offices relative to the certified establishments.

No deficiencies were observed.

## Local Inspection Site at the Certified Establishment

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

No deficiencies were observed.

## 7. ESTABLISHMENT AUDITS

The FSIS auditor visited one swine slaughter and cutting establishment. The specific deficiencies are noted on the attached individual establishment report.

#### 8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

While actual laboratory visits were not within the scope of the current audit, performance was assessed through interviews conducted at the CCA, regional, and local inspection offices.

During these interviews, emphasis was placed on ensu4ring that the application of procedures and standards are equivalent to United States requirements.

Assessment of residue laboratories audits focused on sample handling, sampling frequency, and timely analysis data reporting.

Assessment of microbiology laboratories focused on sample receipt, timely analysis, analytical methodologies, recording and reporting of results.

#### 9. SANITATION CONTROLS

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

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

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

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

#### **9.1 SSOP**

One establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The SSOP in the audited establishment was found to meet the basic FSIS regulatory requirements, with no deficiencies.

## 9.2 SANITATION PERFORMANCE STANDARD

The following deficiency was noted in the SPS category:

• An employee in the cutting room was observed contacting the plastic container liner for edible product with her boots.

#### 9.3 EC Directive 64/433

In one establishment, a deficiency related to EC Directive 64/433 was identified; the specific deficiency is noted in the attached individual establishment report.

#### 10. ANIMAL DISEASE CONTROLS

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

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

## 11. SLAUGHTER/PROCESSING CONTROLS

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

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

## 11.1 Humane Handling and Humane Slaughter

No deficiencies were identified regarding humane handling or humane slaughter.

## 11.2 HACCP Implementation

No deficiencies were identified regarding HACCP implementation.

## 11.3 Testing for Generic E. coli

FSIS has determined the use of *Enterobacteriaceae* and Total Viable Count in lieu of testing for generic *E. coli* is acceptable for all EU exporting countries.

No deficiencies were identified regarding the testing programs for *Enterobacteriaceae* and Total Viable Count.

## 11.4 Testing for *Listeria monocytogenes*

The establishment was not producing ready-to-eat products for export to the United States and was not required to meet the FSIS requirements for *Listeria monocytogenes* testing. Northern Ireland is only exporting raw pork to the US.

#### 11.5 EC Directive 64/433

In one establishment, a deficiency related to EC Directive 64/433 was identified; the specific deficiency is noted in the attached individual establishment report.

## 12. RESIDUE CONTROLS

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

No residue laboratory was reviewed during this audit.

Northern Ireland's National Residue Control program for 2007 was being followed and was on schedule.

#### 12.1 EC Directive 96/22

No residue laboratory was reviewed during this audit.

#### 12.2 EC Directive 96/23

No residue laboratory was reviewed during this audit.

## 13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditors reviewed is Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella* species. No deficiencies were identified in this category.

## 13.1 Daily Inspection in Establishments

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

## 13.2 Testing for Salmonella

One establishment was required to test for *Salmonella* in raw product. Northern Ireland has adopted the FSIS requirements for the testing of carcasses for *Salmonella*.

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

## 13.3 Species Verification

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

## 13.4 Periodic Reviews

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

## 13.5 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, disease or disabled animals; shipment security, including shipment between establishments; to prevent commingling of product intended for export to the U.S. with product intended for the domestic market.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other counties for further processing.

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

## 14. CLOSING MEETING

A closing meeting was held on May 30, 2007 in Belfast with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Oto Urban, DVM Senior Program Auditor

## 15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Forms Foreign Country Response to Draft Final Audit Report

# United States Department of Agriculture Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE		3. ESTABLISHMENT NO. 4. NAME OF COUNTRY			
Grampian Country Pork Limited	5 – 24 - 2007		UK 2052 EEC	Northern Ireland		
70 Molesworth Rd. Cookstown, Northern Ireland	5. NAME OF AUDITOR(S)		R(S)	6. TYPE OF AUDIT		
	Dr. Oto Urban			X ON-SITE AUDIT DOCUMENT AUDIT		
Place an X in the Audit Results block to inc		compl	_			
Part A - Sanitation Standard Operating Procedures (SSOP)  Basic Requirements		Audit Results	Part D - Continued Economic Sampling		Audīt Results	
7. Written SSOP			33. Scheduled Sample			
8. Records documenting implementation.			34. Species Testing			
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue			
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			Part E - Other Requirements			
10. Implementation of SSOP's, including monitoring of implementation.			36. Export			
11. Maintenance and evaluation of the effectiveness of SSOP's.			37. Import			
<ol> <li>Corrective action when the SSOPs have falled to prevent direct product contamination or adulteration.</li> </ol>			38. Establishment Grounds and Pest Control			
13. Daily records document item 10, 11 and 12 above.			39. Establishment Construction/Maintenance			
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			40. Light			
14. Developed and implemented a written HACCP plan .			41. Ventilation			
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.			42. Plumbing and Sewage			
16. Records documenting implementation and monitoring of the HACCP plan.			43. Water Supply			
The HACCP plan is signed and dated by the responsible establishment individual.			44. Dressing Roms/Lavatories  45. Equipment and Utensils			
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			46. Sanitary Operations		X	
18. Monitoring of HACCP plan.			47. Employee Hygiene			
19. Verification and validation of HACCP plan.			48. Condemned Product Control			
20. Corrective action written in HACCP plan.			Part F - Inspection Requirements			
21. Reassessed adequacy of the HACCP plan.			Part F - I			
<ol> <li>Records documenting: the written HACCP plan, monitoring critical control points, dates and times of specific event occ</li> </ol>			49. Government Staffing			
Part C - Economic / Wholesomeness			50. Daily Inspection Coverage			
23. Labeling - Product Standards			51. Enforcement			
24. Labeling - Net Weights			52. Humane Handling			
25. General Labeling						
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mo	oisture)		53. Animal Identification			
Part D - Sampling Generic <i>E. coli</i> Testing			54. Ante Mortem Inspection	1		
27. Written Procedures			55. Post Mortern Inspection	1		
28. Sample Collection/Analysis			Part C. Other Bear	ulatony Oversight Paguimments		
29. Records			rait G - Other Regu	ulatory Oversight Requirements		
Salmonella Performance Standards - Basic Requirements			56. European Community D	rectives	X	
30. Corrective Actions	tive Actions		57. Monthly Review			
31. Reassessment			58.			
32. Written Assurance			59.			

60. Observation of the Establishment

Est. UK 9052 EEC, 5-24-07, Grampian Country Pork, slaughter/processing, Cookstown, Northern Ireland

46/56 An employee was observed to contact the plastic container liner for edible product with her boots in the cutting room. This deficiency was corrected by the establishment management by removing the liner {9 CFR 416.4d} and EC Directive 64/433, Annex I, Chapter V, 18.

61. NAME OF AUDITOR Oto Urban. DVM 62. AUDITOR SIGNATURE AND DATE

7/18/07

From:

R M Houston Chief Veterinary Officer



## **VETERINARY SERVICE**

Donald C Smart
Director
International Audit Staff
Office of International Affairs
USDA/FSIS
1299 Farnam Street, Suite 300
Omaha, NE 68102

13 August 2007

Dear Donald

REPORT OF AN AUDIT OF NORTHERN IRELAND'S MEAT INSPECTION SYSTEM CARRIED OUT BY USDA/FSIS OFFICIALS, MAY 2007 COMMENTS MADE BY THE DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT, NORTHERN IRELAND

Thank you for the copy of the draft report of the USDA/FSIS audit carried out on Northern Ireland's meat inspection system from 22<sup>nd</sup> May to the 30<sup>th</sup> May 2007. I am pleased that your auditor found our service to be, in the main, in compliance with your requirements.

We welcome this opportunity to comment upon its contents.

With regard to the deficiency noted

1. At one establishment an employee was observed to contact the plastic container liner for edible product with her boots in the cutting room. The deficiency was corrected by the establishment management by removing the liner {9CFR 416.4d} and EC Directive 64/433, Annex I, Chapter V, 18.

The management of the establishment have considered this hazard as part of their HACCP review and made the necessary adjustment.

Kind regards.

Yours sincerely

ROBERT HOUSTON
CHIEF VETERINARY OFFICER



Besi Kotati, Minister Councelor, US Embassy London Steve Knight, Agricultural Specialist, US Embassy, London