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

NOV 4 200

Mr. Peter W. de Leeuw
Chief Veterinary Officer
Ministry of Agriculture, Nature and Food Quality
PO Box 19506
2500 CM The Hague
Netherlands

Dear Mr. de Leeuw:

This letter transmits the Food Safety and Inspection Service final report of a meat inspection system audit conducted in the Netherlands from May 25 through June 23, 2005. Comments from the Netherlands have been included as an attachment to the final report. Enclosed is a copy of the final report.

If you have any questions about this audit or need additional information, please contact me at 202-720-3781, facsimile 202-690-4040, or email at sally.white@fsis.usda.gov.

Sincerely,

for Sally White
Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc:
Roger Wentzel, Counselor, US Embassy, The Hague
Inge Hamid-Hardenberg, Agricultural Attaché, Netherlands Embassy, Wash DC
Canice Nolan, EU Mission to the U.S., Wash DC
Norval Francis, Minister-Counselor, US Mission to the EU in Brussels
Scott Bleggi, FAS Area Officer
Robert Macke, ITP, FAS
Amy Winton, State Department
Barbara Masters, Administrator, FSIS
Donald Smart, Director, Review Staff, OPEER
Karen Stuck, Assistant Administrator, OIA
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Armia Tawadrous, Director, FSIS Codex Office
Linda Swacina, Executive Director, FSIA, OIA
Ghias Mughal, IES, OIA
Netherlands Country File

FINAL

FINAL REPORT OF AN AUDIT CARRIED OUT IN THE NETHERLANDS COVERING THE NETHERLANDS' MEAT INSPECTION SYSTEM

MAY 25 THROUGH JUNE 23, 2005

Food Safety and Inspection Service
United States Department of Agriculture

TABLE OF CONTENTS

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority [National Inspection Service for Livestock and Meat (RVV)]
E. coli	*Escherichia coli*
FSIS	Food Safety and Inspection Service
KvW	Inspectorate for Health Protection and Veterinary Public Health
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
RVV	National Inspection Service for Livestock and Meat or Rijksdienst voor de keuring van Vee en Vless (RVV)
Salmonella	*Salmonella* species
SSOP	Sanitation Standard Operating Procedures
USDA	United States Department of Agriculture
VEA	European Community (EC)/United States Veterinary Equivalence Agreement
VIC	Veterinarian-in-Charge
VWA	The Food and Consumer Product Safety Authority or Voedsel-en Waren Autoriteit

1. INTRODUCTION

The audit took place in the Netherlands from May 25 through June 23, 2005.

An opening meeting was held on May 25, 2005, in The Hague 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 the Netherlands' meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the National Inspection Service for Livestock and Meat (RVV), and representatives from the regional and local inspection offices.

2. OBJECTIVE OF THE AUDIT

This audit was a routine annual audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over 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 district office, two laboratories performing microbiology and species verification testing, three swine slaughter establishments, five meat processing establishments and two cold storage facilities.

Competent Authority Visits			Comments
Competent Authority	Central	1	VWA/RVV Headquarters
	Regional	1	VWA/RVV Eastern Region
	District	1	VWA/RVV Harderwijk District
Laboratories		2	
Meat Slaughter Establishments		3	
Meat Processing Establishments		5	
Cold Storage Facility		2	

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 or regional offices. The third part involved on-site visits to 10 establishments: three slaughter establishments, five meat processing establishments, and two cold storage facilities. The fourth part involved visits to two laboratories. One laboratory was conducting analyses of routine samples from certified slaughter establishments for the presence of generic *Escherichia coli (E. coli)* and *Salmonella.* The second laboratory was conducting species verification testing for products destined for export to the United States.

Program effectiveness determinations of the Netherlands' inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures, (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs and a testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. The Netherlands 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 the Netherlands 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 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. FSIS requirements include daily inspection in all certified establishments, humane handling and slaughter of animals, the handling and disposal of inedible and condemned materials, species verification testing, and requirements for HACCP, SSOP, testing for generic *E. coli* and *Salmonella*.

Third, the auditor would audit against any equivalence determinations that have been made by FSIS for the Netherlands under provisions of the Sanitary/Phytosanitary Agreement. Accordingly, FSIS has made an equivalence determination regarding the use of the ISO Method 6579 for *Salmonella* as well as testing for the presence of *Enterobacteriaceae* in lieu of generic *E.coli*.

4. LEGAL BASIS FOR THE AUDIT

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

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

- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

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

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

5. SUMMARY OF PREVIOUS AUDITS

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

In the FSIS audit of the Netherlands in September 2003, the following findings were observed:

- Non-FSIS approved laboratory testing method for *Salmonella* (VIDAS SLM).
- Species verification did not include testing for the presence of beef.
- Inadequate post mortem inspection procedures (mesenteric lymph nodes were not palpated).

In the FSIS audit of the Netherlands in April/May 2004, improvements were noted. However, the following findings were observed:

- Insanitary practice/procedure concerning handling contaminated hog Carcasses as well as dripping condensation onto exposed hog carcasses.
- Production line employees did not remove or change their working clothing before or after using restrooms and/or lunch/break room facilities.
- Submaxillary lymph nodes were not incised/examined by the responsible meat inspector(s) in one slaughter facility.
- HACCP and SSOP record keeping deficiencies.

6. MAIN FINDINGS

6.1 Legislation

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

6.2 Government Oversight

The Food and Consumer Product Safety Authority (VWA) is not only an independent agency in the Ministry of Agriculture, Nature, and Food Quality (LNV) but also is a delivery agency for the Ministry of Health, Welfare and Sport. The VWA is responsible for the inspection and supervision of food, non-food, animal health, and animal welfare. It consists of a central coordinating unit and two delivery units:

1) Inspectorate for Health Protection and Veterinary Public Health (KvW)

2) National Inspection Service for Livestock and Meat (RVV)

The RVV has the organizational structure and staffing to ensure uniform implementation of U.S. requirements in those establishments certified to export meat to the United States. RVV is responsible for directing, planning, and developing meat inspection system in the Netherlands as well as oversight and enforcement of the FSIS regulatory requirements. RVV ensures that the production and sale of animals and products of animal origin meet the standards required for public and animal health and animal welfare. These standards are laid down in European Union directives and Dutch law. RVV also carries out tasks related to animal welfare and animal disease prevention and control through its operational staffs in the field. RVV has a staff of approximately 1,320 personnel to carry out its meat inspection activities. All RVV inspection personnel assigned to establishments certified to export meat to the United States are government employees receiving no remunerations from either industry groups or establishment personnel.

6.2.1 CCA Control Systems

The RVV regulatory oversight of its meat inspection program consists of four levels: central, regional, district, and team. RVV provides direct oversight of four regional offices, which provide oversight of twelve district offices. The district offices manage 42 teams with each team being supervised by a Team Leader who has responsibility of two or more establishments. The Team Leader supervises two or more veterinarians-in-charge, other full time RVV veterinarians, part-time veterinarians (practitioners) and full-time RVV meat inspectors.

6.2.2 Ultimate Control and Supervision

The RVV has the legal authority to supervise and enforce the Netherlands' meat inspection activities through its linear government oversight, i.e., headquarters to regions to districts to Team Leaders.

The in-plant inspection personnel are supervised by the veterinarian-in-charge (VIC) who has the authority to suspend the establishment's production operation any time the wholesomeness and safety of the product are jeopardized. The VIC reports directly to the Team Leader. The Team Leader is responsible for performing comprehensive monthly internal reviews of the establishments certified as eligible to produce products for export to the United States.

6.2.3 Assignment of Competent, Qualified Inspectors

Veterinarians and meat inspectors possess the required educational degree necessary to meet minimum qualifications set by RVV. These inspection personnel have participated in the introductory training courses (six months for veterinarians and four months for meat inspectors) as well as on-the-job training under the supervision of the experienced veterinarians. The regional offices maintain individual training records of inspection personnel. Based on these records, all official veterinarians and meat inspectors assigned to the U.S. approved establishments are PR/HACCP trained. Team Leaders carry the

responsibility to evaluate and report on the performance of the in-plant inspection personnel.

6.2.4 Authority and Responsibility to Enforce the Laws

The RVV has the authority for carrying out the Netherlands' meat inspection program including oversight and enforcement of the FSIS regulatory requirements in establishments certified to export to the United States. RVV not only has the authority to approve establishments for export to the United States, but also has the responsibility for withdrawing such approval when establishments do not meet FSIS requirements. Through the legal process in the courts, RVV, with the assistance of the Netherlands' Investigation and Prosecution Agency (De Algemene Inspectie Dienst), has the authority to prosecute meat establishments and withdraw official inspection.

6.2.5 Adequate Administrative and Technical Support

The RVV has adequate administrative and technical support to operate the Netherlands' meat inspection system and has the resources and the ability to support a third-party audit.

6.3 Headquarters Audit

The auditor conducted a review of inspection system documents at headquarters, one regional office, one district office, and all in-plant inspection offices at the audited establishments.

The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- National residue program
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement actions.

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

6.3.1 Audit of Regional and Local Inspection Sites

The FSIS auditor reviewed the Netherlands' meat inspection records and held interviews with the RVV inspection officials at the regional office and district office shown below:

- Regional East (Kring Oost) in Arnhem
- District Office in Harderwijk

The purpose of the interviews was to examine the meat inspection records and determine the degree of government oversight and control provided by the regional and district offices relative to the establishments certified to export to the United States. No concerns arose as a result of this review.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 10 establishments. Three were slaughter establishments, five were meat processing establishments, and two were cold storage facilities. None of the 10 establishments audited were delisted or received a Notice of Intent to Delist (NOID) from the RVV.

Specific deficiencies are noted on the attached individual establishment reports.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During the laboratory audits, emphasis was placed on the application of procedures and standards that are equivalent to 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. For this audit, FSIS did not review any residue laboratories in the Netherlands.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. For private laboratories, the FSIS auditor evaluated compliance with the criteria established for the use of private laboratories under the PR/HACCP requirements.

The following laboratories were reviewed:

- CCL is a private laboratory located in Veghel. It conducts microbiology analyses (*Enterobacteriaceae*).
- TNO is a private laboratory located in Zeist. It conducts Species Verification for products destined to the United States.

No concerns arose as a result of these reviews.

9. SANITATION CONTROLS

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

Based on the on-site audits of establishments, the Netherlands' inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the

prevention of actual or potential instances of product cross-contamination, good personal hygiene and practices, and good product handling and storage practices.

In addition, the Netherlands' inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

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 the 10 establishments audited were found to meet the basic FSIS regulatory requirements with the following exceptions:

- In one establishment, the responsible establishment employee did not follow the dropped meat procedures, as written in establishment's SSOP plan, causing cross contamination between two pieces of the meat on the table.

The SPS in the 10 establishments audited were found to meet the basic FSIS regulatory requirements with the following exceptions:

- In one establishment, maintenance of overhead structures above exposed product/equipment (injecting and tumbling machines) in curing room had been neglected and loose, flaking paint and numerous holes in ceiling were evident.

9.2 EC Directive 64/433

In the applicable establishments, the provisions of EC Directive 64/433 were effectively implemented regarding sanitary measures.

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, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that the Netherlands' inspection system had adequate controls in place. No deficiencies were noted.

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

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, ingredients identification, control of restricted

ingredients, formulations, processing schedules, equipment and records, 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 *Enterobacteriaceae* in lieu of generic *E. coli* in slaughter establishments.

11.1 Humane Handling and Humane Slaughter

No deficiencies were noted.

11.2 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 eight establishments (two of the 10 establishments audited were cold storage facilities). Five establishments had adequately implemented the HACCP requirements while three establishments did not fully meet HACCP implementation requirements.

- In two establishments, HACCP records documenting the calibration of process-monitoring instruments did not include the time the specific event occurs.
- In one establishment, HACCP records did not document all four parts of the corrective actions taken in response to a deviation from a critical limit.

In regards to processing control, there were two stainless steel containers without proper identification in the production area as follows
:

- One container with edible pork blood in mixing/stuffing room.
- One container with edible pork sausages (finished products destined for rework due to quality issues) was next to another container with inedible pork sausages (finished products marked as category 3 material).

11.3 Testing for Generic *E. coli*

The Netherlands has adopted the FSIS requirements for testing for *E. coli* with the exception of the following equivalent measures.

- Using *Enterobacteriaceae* testing program instead of generic *E. coli* as an indicator organism.
- Using four sampling sites on carcass (flank, brisket, rump, and back).
- Using cork-borer sampling tool.

Three of the 10 establishments audited were required to meet the equivalent of the basic FSIS regulatory requirements for testing for generic *E. coli* and were evaluated according

to the criteria employed in the United States' domestic inspection program and the alternative procedures submitted by the CCA and determined equivalent by FSIS.

Equivalent generic *E. coli* testing (i.e., *Enterobacteriaceae*) was properly conducted in the three slaughter establishments.

11.4 Testing for *Listeria monocytogenes*

Two of the 10 establishments audited were producing ready-to-eat products for export to the United States. These two certified establishments were canning facilities and were producing commercially sterile pork products (i.e., canned hams, canned luncheon meat, and canned cocktail sausages). *Listeria* testing is not required by FSIS for these types of ready-to-eat products.

11.5 EC Directive 64/433

In the applicable establishments, the provisions of EC Directive 64/433 were effectively implemented regarding slaughter/processing controls.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. Based on the document review in regional, district, and applicable inspection offices, the Netherlands' National Residue Control Program for 2005 was being followed and was on schedule. For this audit, FSIS did not review any laboratory conducting residue testing.

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 establishments.

13.2 Testing for *Salmonella*

The Netherlands has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measures:

- The Netherlands uses a continuous, on-going sampling program to determine when to initiate additional *Salmonella* testing.
- The Netherlands uses the swab protocol for sampling. Samples are composited and the entire composite is analyzed.
- The Netherlands uses the ISO 6579 testing method for the detection of *Salmonella*.
- The Netherlands uses the VIDAS SLM screening method for *Salmonella*.

Three of the 10 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.

Salmonella testing was properly conducted in all three of the certified slaughter establishments.

13.3 Species Verification

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

13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required.

13.5 Inspection System Controls

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

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

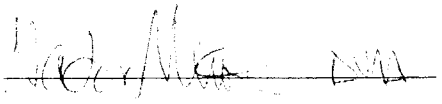
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on June 23, 2005, in The Hague with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. Nader Memarian
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
Dumeco Boxtel B.V. Boseind 10 5281 RM Boxtel	06/07/2005	NL-061-EEG	The Netherlands
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Nader Memarian		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
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	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment NL-061-EEG Audit Date: 06/07/2005 Slaughter Operation

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

06-22-05

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
Dumeco Scherpenzeel B.V. Zwarte Land 13, 3925 CK Scherpenzeel	06/15/2005	NL-082-EEG	The Netherlands
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Nader Memarian		[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	
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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.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
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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	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
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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	
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	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment NL-082-EEG Audit Date: 06/15/2005 Processing Operation

Note: All deficiencies noted during the previous FSIS audit (April/May, 2004) had been addressed and corrected prior to this audit.

10 The responsible establishment employee did not follow the dropped meat procedures, as written in establishment's SSOP plan, causing cross contamination of products {9CFR part 416.13}.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

DVM 06-27-05

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
Dumeco Beuningen B.V. Zilverwerf 8 6641 TD Beuningen	06/09/2005	NL-124-EEG	The Netherlands
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Nader Memarian	[X] ON-SITE AUDIT	[ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	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	
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	
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	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment NL-124-EEG Audit Date: 06/09/2005 Processing Operation

Note: All deficiencies noted during the previous FSIS audit (April/May, 2004) had been addressed and corrected prior to this audit.

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

Nader Memarian, DVM 06-28-05

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
Zwanenberg Food Group B.V. Sluisweg 7, 7602 PR Almelo	05/31/2005	NL-129-EEG	The Netherlands
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Nader Memarian		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 SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
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	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	
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	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment NL-129-EEG Audit Date: 05/31/2005 Processing Caning Operation

Note: All deficiencies noted during the previous FSIS audit (April/May, 2004) had been addressed and corrected prior to this audit.

22/51 HACCP records documenting the calibration of process-monitoring instruments did not include the time the specific event occurs {9CFR part 417.5 (b)}.

61. NAME OF AUDITOR
Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE
Nader M DVM 06-28-05

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
Zwanenberg Food Group B.V. Westdorplaan 225 8101 PN, Raalte	06/01/2005	NL-153-EEG	The Netherlands
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Nader Memarian	[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 SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	X
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	
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	
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	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment NL-153-EEG Audit Date: 06 01 2005 Processing Caning Operation

Note: All deficiencies noted during the previous FSIS audit (April/May, 2004) had been addressed and corrected prior to this audit.

25 There were two stainless steel containers without proper identification in production area (9 CFR part 317):
-one container with edible pork blood (in mixing/stuffing room).
-one container with edible pork sausages (finished products destined for rework due to quality issues) was next to another container with inedible pork sausages (finished products marked as category 3 material).

61. NAME OF AUDITOR
Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE
Nader Mem DVM 06-28-05

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
Dumeco Apeldoorn B.V. Laan van Malkenschoten 77, 7333 NP Apeldoorn	06/15/2005	NL-312-EEG	The Netherlands
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Nader Memarian		[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 SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
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	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

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

60. Observation of the Establishment:

Establishment NL-312-EEG Audit Date: 06/16/2005 Slaughter Processing

Note: All deficiencies noted during the previous FSIS audit (April/May, 2004) had been addressed and corrected prior to this audit.

22/51 HACCP records documenting the calibration of process-monitoring instruments did not include the time the specific event occurs {9CFR part 417.5 (b)}.

61. NAME OF AUDITOR
Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE
06-28-05

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
Dumeco Helmond B.V. Graandijk 5 5704 RB Helmond	06/06/2005	NL-378-EEG	The Netherlands
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Nader Memarian		[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 SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
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	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment NL-378-EEG Audit date: 06/06/2005 Slaughter Processing

Note: All deficiencies noted during the previous FSIS audit (April/May, 2004) had been addressed and corrected prior to this audit.

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

06-28-05

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
Dumeco Doetinchem B.V. Voltastraat 21 7006 RS, Doetinchem	05/27/2005	NL-404-EEG	The Netherlands
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Nader Memarian		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
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	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	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment NL-404-EEG Audit Date: 05/27/2005 Processing Boning Operation

39/51 Maintenance of overhead structures above exposed product/equipment (injecting and tumbling machines) in curing room had been neglected with loose and flaking paint and numerous holes in ceiling in evidence {9CFR part 416.4}.

22/51 Establishment HACCP records did not document all four parts of the corrective actions (especially measures to prevent recurrence) taken in response to a deviation from a critical limit {9CFR part 417.3(a) & (c)}.

61. NAME OF AUDITOR
Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE
Nader Memarian DVM 06-28-05

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
Koel-en Vrieshuis Lintelo Vrieshuis B.V. Albert Schweitzer Street 25 7131 PG Lichtenvoorde	05/30/2005	NL-451-EEG	The Netherlands
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Nader Memarian		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 SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	O
34. Species Testing	O
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
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	
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	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment NL-451-EEG Audit Date: 05/30/2005 Cold Storage

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

06-28-05

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
Lau Van Haren Coldstores B.V. Metaalweg 15, 6551 AC Weurt	06/14/2005	NL-584-EEG	The Netherlands
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Nader Memarian		[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 SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	O
34. Species Testing	O
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
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	
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	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment NL-584-EEG Audit Date: 06/14/2005 Cold Storage

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

Nader Memarian, DVM 06-28-05

Ministerie van Landbouw, Natuur en Voedselkwaliteit

U.S. Department of Agriculture
Mrs. Sally White, Director
Food Safety and Inspection Service
Office of International Affairs
International Equivalence Staff
Washington, D.C. 20250

landbouw, natuur en voedselkwaliteit

Your letter of	your reference	our reference	date
August 18, 2005		VD 05.3021/IH	October 25, 20005
re:		extension no.	enclosures
Draft Final Audit Report		+31 70 378 5435	

Dear Mrs. White,

Thank you for providing us with the opportunity to review the draft Final Audit Report of the on-site audit of the Netherlands meat inspection system, which took place from May 25 through June 23, 2005.

The audit was a routine annual audit and included visits to 10 of the 13 establishments certified for exportation to the United States. I was pleased to note that in general the findings of the auditors were quite positive. A few remarks were made by the auditors, as noted in the report, which I all agree with. In all cases the required corrective action was promptly taken and documented.

I, therefore, have no further comments to the report. I would like to draw your attention to the fact that as of January 1, 2006, the names of the two delivery units of the VWA will cease to exist. The KvW and the RVV will be merged into one organisation and will both operate under the single name of the Food and Consumer Product Safety Authority (VWA).

Sincerely yours,

CHIEF VETERINARY OFFICER,

dr. P.W. de Leeuw

Cc:
VWA, Bettine Murlat
PVE, Gerke Corstiaensen
LNV-raad, Wim Tacken
DG-Sanco, Lorenzo Terzi

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