To: District Managers   APR   1 2005

From: for Karen Stuck
           Assistant Administrator
           Office of International Affairs

Subject: Export Notice 2005-2, Checklist for Verification of European Union
                Export Requirements

This Notice applies to establishments approved for export of meat and meat products for human consumption to European Union (EU) Member States[1] and to establishments seeking approval to export meat and meat products to the EU. A list of approved plants (Fresh Meat, Meat Products, Casings, Farmed Game, Ratites, and Wild Game) is available in the FSIS Library of Export Requirements (Export Library). The plant lists can be accessed from the FSIS homepage by going to the box on the right identified by "I want to …" and selecting the following: Export or Import Meat, Poultry and Egg Products / Export Information / Eligible Export Establishments by Country/ European Union.

In order for meat and meat products to bear the required EU health mark label for export to the EU, the product must meet U.S. domestic requirements as well as some additional EU-specific requirements. EU requirements can be accessed from the FSIS homepage by going to the box on the right identified by "I want to …" and selecting the following: Export or Import Meat, Poultry and Egg Products / Export Information / Export Requirements for Meat and Poultry Products / European Union.

To document that an establishment is operating in conformance with EU requirements, it is necessary to conduct a verification review (1) when an establishment initially requests export approval to the EU, and (2) periodically to assure that the establishment continues to meet EU requirements. To facilitate the verification review process and document the results, a checklist (FSIS Form 9100-1 (03/09/2005) *EU Conformance Verification Checklist for Meat and Poultry Establishments* (EU Checklist)) has been developed to be used in conjunction with the EU requirements specified in the Export Library. These requirements should be reviewed prior to performing the verification review and completing the checklist.

The EU Checklist is available electronically via MS Outlook. To access the master file for FSIS Form 9100-1, go to: Public Folders / All Public Folders / Agency Issuances / Forms / FSIS 9,000 Series. Open FSIS Form 9100-1 and "Save As" with a name of your choice to a drive and file folder of your choice. Close the Outlook folder containing the master copy of FSIS Form 9100-1. The saved form can then be used like any other Word file. The saved copy of FSIS Form 9100-1

---

[1] Austria, Belgium, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden, United Kingdom

can be completed electronically or printed and completed manually. When completed electronically, use "Save As" to store the form with a unique file name that identifies the verification review you have completed. A hardcopy of all completed forms must be signed, dated, and filed at the FSIS office in the establishment for review when the EU conducts an audit.

For all plants approved to export to the EU (excluding cold storage facilities) the EU Checklist must be completed by the Public Health Veterinarian (PHV) or Consumer Safety Inspector (CSI) a minimum of once per year. For plants that produce product for export to the EU on a routine basis, the review should be conducted each calendar quarter that product is produced. The EU verification review should be conducted after all food safety and food security activities have been performed, and may be done as a reimbursable over-time service, if necessary.

The EU Checklist identifies fixed and modal requirements. Fixed requirements, such as water testing and employee health certification, are expected to be completed and on file for verification at all times. Modal requirements, such as non-commingling of EU and non-EU product, wood pallet separation, and health mark application, must be in place when the establishment is producing in the EU mode or during mock production when the EU production mode is infrequent.

If an approved plant is not in conformance with the EU requirements, the IIC should withhold the EU health mark (See Export Library, EU Requirements, Section XVI Compliance and Oversight), should notify plant management of the situation and document the discussion in a memorandum of interview. The EU health mark should be returned to a secure location until the situation has been resolved. When the situation has been resolved and all applicable elements can be marked as "acceptable," the checklist should be completed, signed, dated, and filed.

Completed EU Checklists must be maintained in the FSIS office at the establishment and made available during audits. In addition, completed EU Checklists must be sent by email to importexport@fsis.usda.gov or by FAX in the event that electronic transmission is not possible. The FAX should be sent to the Import Export Programs Staff at (202) 720-7990. **The first EU Verification Checklist for all currently approved establishments must be completed during the month of April 2005.**

For establishments seeking initial EU approval, the EU Verification Checklist must be completed in conjunction with FSIS 9080-3, Establishment Application for Export. For additional information about the plant approval process, see the Section XIX Plant Approval Process in the Export Library EU requirements.

Questions should be directed to the Technical Service Center at Area Code (402) 221-7400.

cc: William Smith, AA, OFO
        Ken Petersen, ADAA, OFO
        Joan Collins, PM, OFO
        John Prucha, EARO, OFO
        Judith Riggins, EARO, OFO
        Jeanne O. Axtell, EARO, OFO