

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

APR 30 2002

Dr. Isabelle Chmitelin Chief Veterinary Officer Ministry of Agriculture 251 Rue de Vaugirard 75732 Paris Cedex 15, France

Dear Dr. Chmitelin:

The Food Safety and Inspection Service (FSIS) has completed an on-site audit of France's meat and poultry inspection system. The audit was conducted from May 7 through May 23, 2001. Enclosed is a copy of the final audit report. Your comments have been included as Attachment "G" in the final audit report. FSIS appreciates the corrective actions taken by the Government of France to address the audit findings.

If you have questions regarding the audit or need additional information, please contact me at 202-720-3781. You may also reach me by fax number 202-690-4040 or by e-mail address <u>sally.stratmoen@fsis.usda.gov</u>. Alternatively, you may contact Richard F. Brown by phone at 202-690-2679, by fax at 202-690-4719, or you may reach him by e-mail at <u>richard.brown@fsis.usda.gov</u>.

Sincerely,

 Sally Stratmoen
 Chief, Equivalence Section
 International Policy Staff
 Office of Policy, Program Development and Evaluation

Enclosure

cc:

Alejandro Checchi-Lang, European Commission, Brussels, Belgium Besa Kotati, Agricultural Counselor, U.S. Embassy, Paris Carol Buy, Acting Counselor for Agriculture, Embassy of France, Wash., DC bcc:

Ronald Hicks, Acting Associate Administrator, FSIS Maritza Colon-Pullano, SAIFS, OPPDE Joerg Niederberger Agric. and Consumer Affairs, EU Mission to the U.S., Wash., DC Mary Revelt, Minister/Counselor for Agric. Affairs, USEU/Brussels John Prucha, ADA, Program Coordination and Evaluation, OPPDE Sally Stratmoen, ES, IPS, OPPDE Karen Stuck, IES, IPS, OPPDE Donald Smart, Director, Review Staff, OFO John Wilson, FAS Area Officer Amy Winton, State Department Nancy Goodwin, ES, IPS Country File – France Audit FY2001 – final

FSIS:OPPDE:IPS:NGoodwin:bw:4/30/02:720-9187:4/5/02:France-final audit to CVO May 2001 audit



United States Department of Agriculture Food Safety And Inspection Service Technical Service Center Suite 300, Landmark Center 1299 Farnam Street Omaha, NE 68102

# AUDIT REPORT FOR FRANCE

MAY 7 THROUGH MAY 23, 2001

# INTRODUCTION

## **Background**

This report reflects information that was obtained during the annual audit of France's meat and poultry inspection system from May 7 through May 23, 2001. Eight of the twenty-seven establishments that were eligible to export meat and poultry products to the United States (U.S.) were audited. Four of the eight establishments audited on-site were slaughter establishments and four were processing operations.

The last audit of France's meat and poultry inspection system was conducted from October 16 through November 8, 2000. Eleven of the twenty-nine establishments were then eligible to export meat and poultry products to the United States were audited. Eight establishments were acceptable; three (24-396-01, 29-027-01 and 29-225-01) were evaluated as acceptable/re-review. The principal concerns with system at that time were the following:

- 1. In Ests. 29-225-01 and 29-027-01, the floor, overhead structures and conveyor belts were in need of repair and replacement. In these establishments, corrective actions were not being taken for contamination of product-contact surfaces, and the frequency and time of pre-operational and operational sanitation checks were not recorded in the Sanitation Standard Operating Procedures (SSOP). Heavy rail grease was observed at several places on the overhead structures and on the rails in the cooler in Est. 29-027-01. Cobwebs and broken ceilings were observed in dry storage area in Est. 29-225-01.
- 2. In Est. 24-396-01, condensation on the overhead structures and cracked floors was observed.
- 3. In Est. 87-085-02, daily operational sanitation checks were not being conducted, records were not being maintained, and SSOP document was not signed and dated.

The auditor verified on-site that all of the deficiencies from the last audit were corrected. The French authorities stated that documentation of all corrective measures taken was available for review at the departmental offices.

At the time of this audit, France was eligible to export fresh, processed and canned poultry products and canned pork products to the United States. At this time, France is not eligible to export beef and fresh products due to Bovine Spongiform Encephalopathy (BSE) and Foot and Mouth Disease (FMD).

From January to April 2001, France exported 163,550 pounds of canned pork, canned varied combination, processed varied combination products, poultry product specialty items, ready-to-cook geese, and cured pork products to the United States. One hundred seventy seven (177) pounds of product were rejected at port-of-entry for unsound condition.

#### PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with the French national meat and poultry inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records from ten establishments at the French meat inspection headquarters. The third part was conducted by on-site visits to eight establishments. The fourth was a visit to the Laboratoire National Veterinaire de Rungis, a central laboratory at Rungis, which cultures field samples for the presence of microbiological contamination with *Salmonella* and *Escherichia coli* (*E. coli*).

Frances's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the generic *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

In accordance with the European Union/United States Veterinary equivalence Agreement, the auditors audited France's meat and poultry inspection system using European Directives, specifically Council Directives 96/23EC of April 29, 1996, 96/22/EC of April 29, 1996, and 64/433/EC of June 1964. These three directives have been declared equivalent under the Agreement. In areas not covered by these directives, the auditors audited against FSIS requirements and equivalence determinations. France has been granted two equivalence determinations. These determinations concerned the use of a different analytical method for analyzing *Salmonella* samples and tightened enforcement by the government of France for performance standard failures.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect, and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's inspection officials.

#### **RESULTS AND DISCUSSION**

#### Summary

Effective inspection system controls were found to be in place in all eight of the establishments audited; two of these (29-097-01 and 40-088-03) were recommended for rereview. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

As stated above, the major concerns identified during the last audit of the French meat and poultry inspection system had been addressed and corrected.

## Entrance Meeting

On May 7, 2001, an entrance meeting was held with French government officials in Paris. The French participants included Dr. Paul Mennecier, Chief International Unit; Dr. Thibault Lemaitre, Veterinary Officer, Mr.Christian Bastien, Bureau of establishment transformation of MAF-DGALG; and Dr. Jorgen Alveen, Veterinary Inspector, Food and Veterinary Office, European Commission, Health and Consumer Protection Directorate General (EC-HCPDG), Dublin and Dr. Maryse Flamme, Veterinary Inspector, National Interprofeessional Agency for Meat, Livestock and Poultry, Paris, France (OOFIVAL).

The U.S. participant was Dr. Suresh Singh, International Audit Staff Officer; United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS), Technical Service Center, Omaha, Nebraska.

Topics of discussion included the following:

- Welcome by French officials and explanation of the U.S. audit to E.U Officials.
- Overview of the French National Meat Inspection Program and Itinerary for this audit.
- Organization of HACCP coordination team.
- Discussion of the previous audit report.

## Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of the French inspection system in October 2000, except for the retirement of Dr. Bernard Vallat, Chief Veterinary Officer of MAF-DGAL of France and the appointment of Dr. Isabelle Chmitelin to the position and appointment of Dr. Paul Mennecier as Head of the International Sanitary Coordination Unit who was Agriculture Counselor at Washington. The Director General of DGAL is Catherine Geslain-Laneelle. In addition, the GOF has recently created an inspection coordination unit at the central and regional levels to oversee and enforce U.S. requirements for HACCP, SSOP, generic *E. coli* and *Salmonella* testing programs.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the veterinary inspection officials who normally conduct monthly supervisory reviews and/or audits for compliance with US import requirements lead the audits of the individual establishments. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the following establishments: 02-502-01, 22-093-01, 32-147-23, 35-188-01, 40-282-02, 47-157-043, 53-097-01, 67-447-05, 85-109-01, and 85-065-01. The records review was conducted at France's inspection headquarters and at a regional office. The records review focused primarily on food safety hazards and included the following:

- Supervisory visits to establishments that were certified to export to the U.S.
- New laws and implementation documents, such as laws, regulations, notices, directives and policy guidelines.
- Pathogen reduction and other food safety initiatives such as SSOP, HACCP programs, generic *E. coli* testing and *Salmonella* testing
- Control of products from livestock with conditions such as tuberculosis and cysticercosis, and of inedible and condemned materials.
- Export product inspection and control including export certificates
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, and seizures; control of noncompliant product; and withholding, suspending, or withdrawing inspection from certified establishments that export to the U.S.

No concerns arose as a result of examination of these documents except few discrepancies in SSOP and HACCP documents which are mentioned in Attachments A and B.

## Government Oversight:

All inspection service veterinarians and inspectors in establishments certified by France as eligible to export meat products to the United States were full-time Veterinary Inspection employees of MAF-DGAL, receiving no remuneration from either industry or establishment.

Recently, central and regional coordinators have been appointed within GOF-DGAL to coordinate and correlate HACCP and microbiological testing and other food inspection activities in all exporting meat and poultry establishments.

There is no daily coverage of inspection in processing establishments. In U.S. certified establishments, government inspectors do not visit processing establishments on daily basis.

## Establishment Audits:

Eight out of 27 establishments certified to export meat and poultry to the US were audited on site (19-031-02, 29-027-01, 29-097-01, 29-225-01, 40-088-03, 40-143-50, 56-091-01, and 67-482-21); six were acceptable and two establishments (29-097-01 and 40-088-03) were judged acceptable subject to re-review. These two establishments immediately corrected the observed deficiencies, however, other variations were observed during the current audit and these variations are mentioned later in this report. In all eight establishments visited, both

French inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Details of audit findings and observations, including compliance with HACCP, SSOP, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

#### Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories, intra-laboratory quality assurance procedures, including sampling handling and methodology.

The Laboratoire Departmental Veterinaire in Quimper was audited on May 18, 2001. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequencies, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No composting of samples was done.

France's microbiological testing program for *Salmonella* and generic *E. coli* was being performed in the government laboratory at the Laboratorire Regional of Veterinaire (Departmental Veterinary Laboratory), MAF-DGAL. Dr. Eric Laporte is the Director of this laboratory.

#### Establishment Operations by Establishment Number

The following operations were being conducted in the eight establishments:

Swine slaughter, cutting, and boning—three establishments (29-225-01, 29-097-21, and 56-091-01)

Ducks and geese, boning and canning—three establishments (19-031-02, and 40-088-03, 67-482-21)

Pork, chicken, duck and goose, boning, cutting, grinding, smoking, cooking and canning-one establishments (29-027-01).

Duck slaughter —one establishment (40-143-50).

## SANITATION CONTROLS

Based on the on-site audits of establishments, France's inspection system had controls in place for basic establishment facilities, condition of facilities, product protection and handling and establishment sanitation programs except the concerns of cross-contamination noted below.

#### Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements with the following variations:

#### **Cross-Contamination**

Cross contamination of head of carcasses from dressing floor and workers boot was observed in one of the establishment (29-097-011 audited. The Government of France and establishment officials took corrective actions.

<u>Product Handling and Storage</u>: In the area of product handling and storage, the following deficiency was found.

In Est. 29-097-21, products that accidentally contaminated on the floor were not properly reconditioned and there was not a designated area to carry out reconditioning procedures.

<u>Personal Hygiene and Practices:</u> In the area of personal hygiene and practices, in all establishments, employees were observed to follow good personal hygiene and practices.

#### ANIMAL DISEASE CONTROLS

France's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control and procedures for sanitary handling of returned and rework product.

Since the previous U.S. audit, there have been reports of outbreaks of Foot and Mouth Disease and of Bovine Spongiform Encephalopathy (BSE) in cattle, with significant public health significance. French and EU officials are taking several precautions and adopting procedures and programs to control both outbreaks. The U.S. does not import any beef products from France.

#### **RESIDUE CONTROLS**

There was in-depth team audit of the residue program during last review. The national residue plan for 2001 was being followed and was on schedule. The French inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

#### SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the French inspection system had controls in place to ensure adequate animal identification; ante-mortem inspection procedures; ante-mortem disposition; humane slaughter; post-mortem inspection procedures; post-mortem dispositions; condemned product control; restricted product control; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

#### **HACCP** Implementation

All establishments approved to export meat and poultry products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements with the following exceptions:

- 1. In one establishment (56-091-01), the frequency of monitoring of critical control points (CCPs) was not specified and adequate documentation for recording CCPs was not performed.
- 2. In one establishment (29-097-01), pre-shipment review of HACCP records was not being conducted.

## Testing for Generic E. coli

France has adopted the FSIS regulatory requirements for generic E. coli testing.

Five of the establishments audited were required to meet the basic FSIS regulatory requirements foe generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic program. The data collection instruments used accompanies this report (Attachment C).

The E. coli testing programs were found to meet the basic regulatory requirements.

Additionally, establishments had adequate controls in place to prevent meat and poultry products intended for French domestic consumption from being commingled with products eligible for export to the U.S.

#### ENFORCEMENT CONTROLS

#### Inspection System Controls

Except as noted below, the French meat and poultry inspection system had controls in place for ante- 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 U.S. with domestic product.

Also, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans) were in place and effective in ensuring that products produced by the establishments were wholesome unadulterated, and properly labeled.

In addition, controls are in place for inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat or poultry products from other counties for further processing. These controls were in place and effective in ensuring that products produced by the establishments were wholesome, unadulterated, and properly labeled. Adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Boneless meat re-inspection and associated record keeping was not carried out in those establishments where boneless meat re-inspection was required (processing establishments).

#### Testing for Salmonella Species:

Five of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

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

- 1. The Government of France uses ISO 6579 to analyze samples for Salmonella.
- 2. France suspends an establishment from export to the U.S. the first time the establishment fails to meet a performance standard.

#### Species Verification Testing:

At the time of this audit, France was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

#### Listeria monocytogenes Testing

Establishments must implement a *Listeria monocytogenes-testing* program for ready-to-eat products. France has implemented a separate, national *Listeria monocytogenes* testing program and the program is operating in accordance with U.S. requirements.

#### Monthly Reviews

FSIS requires that monthly supervisory visits be performed in certified French establishments. However, the Government of France was not performing monthly supervisory visits in establishments certified to export to the U.S. The Prefecture (Regional) Director's office of MAF performs in-depth reviews of certified establishments once or twice a year. Local veterinarians of MAF were conducting reviews based on the time available and the discretion of supervisory inspection officials. DGAL inspectors review all processing establishment as needed for export and for other activities.

The internal review program was not applied equally to both export and non-export establishments. The records of audited establishments were kept in the inspection offices of the individual establishment and in the Prefecture (regional) MAF offices.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility, the deficiencies must be satisfactorily corrected and acceptable to the National Inspection Supervisor.

#### **Enforcement Activities**

Enforcement activities are carried out by MAF-DGAL, which has full power to initiate all enforcement actions.

#### Exit Meeting

Exit meeting was conducted in Paris on May 23, 2001. This was a videoconference with European Union (EU) and was arranged by MAF-DGAL and was held at the office in the main building of Ministry Of Agriculture and Food (MAF). This meeting was held to discuss the findings of the audit.

The exit meeting was attended by Dr. Paul Mennecier, Head of the International Sanitary Coordination Unit, Dr. Thibault Lemaitre, chief Bureau of Transformation; Mr.Christian Bastien of MAF. Dr. Thomas Golden; and Dr. Jorgen Alveen, Veterinary Officers, European Union, Dublin and Brussels (on TV Video); and Dr. Maryse Flamme, Meat Board (OFIVAL-MAE) of France.

The U.S. participant was Dr. Suresh Singh, International Audit Staff Officer, Technical Service Center, FSIS, USDA, Omaha, Nebraska.

The following topics were discussed:

- Findings and conclusions of the audit.
- Findings noted with HACCP pre-shipment verification and SSOP record keeping for preoperational and operational sanitation.
- Lack of monthly reviews of certified establishments and inadequate establishment and inspection service verification of establishments' HACCP records.

# CONCLUSION

The French meat and poultry inspection system was found to have effective controls in place to ensure that product destined for export to the U.S. was produced under conditions equivalent with requirements of FSIS as in U.S. domestic establishments. Eight establishments were audited; six were acceptable and two were acceptable subject to rereview. The deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction.

Dr. Suresh P. Singh International Audit Staff Officer (signed) Dr. Suresh P. Singh

# ATTACHMENTS

- A. Data collection instrument for SSOP
- B. Data collection instrument for HACCP programs
- C. Data collection instrument for generic *E. coli* testing
- D. Data collection instrument for *Salmonella* testing
- E. Laboratory Audit Forms
- F. Individual Foreign Establishment Audit Forms
- G. Written foreign country's response to draft final audit report

#### **Data Collection Instrument for SSOP**

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the US domestic inspection program. The data collection instrument contained the following statements:

- 1. The establishment has a written SSOP program.
- 2. The procedure addresses pre-operational sanitation.
- 3. The procedure addresses operational sanitation.
- 4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
- 5. The procedure indicates the frequency of the tasks.
- 6. The procedure identifies the person responsible for implementing and maintaining the activities.
- 7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
- 8. The procedure is dated and signed by the person with overall on-site authority.

1.	2.	3.	4.	5.	6.	7.	8.
Written	Pre-op	Operation	Food	Task	Person	Daily	Dated and
SSOP	sanitation	sanitation	Contact	frequency	resp	Records	signed
	$\checkmark$	No				$\checkmark$	
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The results of these evaluations were as follows:

Internal compliance of audit documentation of SSOP and records for establishments 0250201, 2209301, 3214723, 3518801, 4028218801, 47157043, 5309701, 6744705, 8506501, and 8510901 were audited and met all FSIS requirements, except in establishment 53-097-01 where SSOP was included in the HACCP plan and operational sanitation was not addressed and documented in establishments 3214723 and 47157043. The establishment and French Veterinary officials agreed to correct these deficiencies as required by Pathogen Reduction regulations (CFR-9-Parts-416 and 417).

#### **Data Collection Instrument for HACCP Programs**

Each of the establishments approved to export meat products to the US is required to have developed and implemented a Hazard Analysis and Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the US domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.

2. The establishment had conducted a hazard analysis that includes food safety hazards likely to occur.

- 3. The analysis includes the intended use of or the consumers of the finished product(s).
- 4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
- 5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
- 6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
- 7. The plan describes corrective actions taken when a critical limit is exceeded.
- 8. The HACCP plan was validated using multiple monitoring results.
- 9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
- 10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
- 11. The HACCP plan is dated and signed by a responsible establishment official.
- 12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

E st		1 F l o w d i a g r a m	1. Hazard and analysis conducte d	3.use &users include d	4.Plan for each hazards	5.CCPs for all hazards.	6.Monit oring is specifie d.	7.Corre ction are describ ed.	8.Plan validate d.	9.Adeq uate verifica tion procedu res.	10.Ade quate docume ntation.	11.Date and Signed.	12.Pre- shipme nt docume nt review.
190 02	31	$\checkmark$	$\checkmark$	$\checkmark$	V	$\checkmark$	V	V	V	V	V	V	$\checkmark$
290 01	27	$\checkmark$	$\checkmark$	$\checkmark$	V	$\checkmark$	V	V	V	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$
290 01	97	$\checkmark$	$\checkmark$	$\checkmark$	V	$\checkmark$	V	No	V	V	V	V	no
292 01	25		$\checkmark$	V	V	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	V
400 03	88	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$

40143 50	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	V	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	V
56091 01	$\checkmark$		V	$\checkmark$	V	No	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	V	$\checkmark$
67482 21	V		$\checkmark$	V	V							

Internal compliance of audit documentation of HACCP and records for establishments 0250201, 2209301, 3214723, 3518801, 4028218801, 47157043, 5309701, 6744705, 8506501, and 8510901 were audited and met all FSIS requirements, except in establishment 2909721 where corrective actions were not recorded in the monitoring of a CCP. Pre-shipment review was not documented in few establishments (3214723 and 47157043. The establishment and French Veterinary officials agreed to correct these deficiencies as required by Pathogen Reduction regulations (CFR-9-Parts-416 and 417).

#### Data Collection Instrument for Generic E. coli Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic E. coli testing were met, according to the criteria employed in the US domestic inspection program. The data collection instrument contained the following statements:

- 1. 2.
- The establishment has a written procedure for testing for generic E. *coli*. The procedure designates the employee(s) responsible to collect the samples.
- 3. The procedure designates the establishment location for sample collecting.
- 4. The sample collection is done on the predominant species being slaughtered.
- The sampling is done at the frequency specified in the procedure.
  The equivalent carcass site and collection methodology (Swab) is being used for sampling.
- 7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
- 8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.

The results of the tests are being recorded on a process control chart but on a table form 9. showing the most recent test results.

10. The test results are being maintained for at least 12 months.

	1.Writ-	2. Samp-	3.Samp-	4. Pre-	5. Samp-	6. Pro-	7. Samp-	8. Using	9. Chart	10. Re-
	ten pro-	ler	ling	domin.	ling at	per site	ling is	AOAC	or graph	sults are
Est. #	cedure	designat	location	Species	the req'd	or	random	method	of	kept at
		ed	given	sampled	freq.	method			results	least 1 yr
2902			$\checkmark$		$\checkmark$				$\checkmark$	$\checkmark$
721										
2909										
721										
5609										
101										
4014										
350										
2922										
501										

Internal compliance of audit documentation of E.coli testing and results and records for establishments 2209301, 3518801, 5309701, and 8510901 were audited and met all FSIS requirements.

## Data Collection Instrument for Salmonella Testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the US domestic inspection program. The data collection instrument included the following statements:

- 1. Salmonella testing is being done in this establishment.
- 2. Carcasses are being sampled.
- 3. Ground product is being sampled.
- 4. The samples are being taken randomly.
- 5. The equivalent carcass site and method is being used for sampling.
- 6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

	1. Testing	2.	3. Ground	4. Samples	5. Proper	6.
Est. #	as required	Carcasses	product is	are taken	site and/or	Violative
		sampled	sampled	randomly	proper	est's stop
					product	operations
2922501	$\checkmark$	$\checkmark$	N/A			
	$\checkmark$					
2902701						
	$\checkmark$	$\checkmark$	N/A			$\checkmark$
5609101						
	$\checkmark$	$\checkmark$	N/A			
4014350						
			N/A			
2909721						

Documentation was also audited from establishments 2209301 3518801 and 5309701 that were not visited on-site. All audited records from these establishments met the FSIS requirements.

	U.S. DEPARTMENT OF AGRICULT FOOD SAFETY AND INSPECTION SE			· · · · · · · · · · · · · · · · · · ·	Ĩ		DATE	NAM	E OF FO	DREIGN	LABOR	ATORY	At	tach	monte
F	INTERNATIONAL PROGRAMS		EVI	EW		05-18-	2001	Labo creac	ratoire hgwer	Depar 1	tment N	/eterna			
	N GOV'T AGENCY y of Agiculture,DGAL			COUNTI er, Fran			,			F LABO de la I			334, Q	uiempe	:r
NAME ( Dr.S.P	DF REVIEWER Singh			F FORE		FFICIAL	Lab	-1							
<del></del>	Residue Code/Nar	ne 🕨		100	400	900								1.	
	REVIEW ITEMS	ITEM #	Τ			1	1	1	1		1	1	1	1	
	Sample Handling	01		۸	<b>A</b>	A									
DURES	Sampling Frequency	02	CODE	A	<b>A</b>	•			ļ						
SAMPLING PROCEDURES	Timely Analyses	03	TION C	•	A	A									
DNING	Compositing Procedure	04	EVALUATION	0	0	0			<u> </u>						
SAI	Interpret Comp Data	05		0	0	0						<u> </u>			·
	Data Reporting	06		•	A	•	<u> </u>			<u> </u>		<u> </u>		<u> </u>	
ט ב	Acceptable Method	07	CODE	A	A	•	<b> </b>						<u> </u>	<u> </u>	
ANALYTICAL PROCEDURES	Correct Tissue(s)	08	TION C	•	A	•		<b> </b>	<u> </u>	<u> </u>		<b>_</b>			
ANAL	Equipment Operation	09	EVALUATION	•	A	•		<u> </u>						ļ	
	Instrument Printouts	10	ŵ	A	A	A									
	Minimum Detection Levels	11		٨	A	•									
4CE	Recovery Frequency	12	٣	•	<u>A</u>	<b>A</b>									
URAI RES	Percent Recovery	13	A CODE	•	A	•									
' ASS CEDU	Check Sample Frequency	14	A10	٨	A	•									
QUALITY ASSURANCE PROCEDURES	All analyst w/Check Samples	15	EVALUATION	•	A	•									
σn	Corrective Actions	16	<sup>آ</sup>	A	A	A									
	International Check Samples	17		0	0	0									
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE	*	٨	•									
OTHER REVIEW		19	CODE												
OT! REV		20	EVAL.												
SIGNA	TURE OF REVIEWER	Anig	, ,	<u>،                                     </u>		_1	<u></u>	<b>.</b>	<u> </u>	DATE		1200		<b>.</b>	L



United States Department of Agriculture Food Safety And Inspection Service Technical Service Center Suite 300, Landmark Center 1299 Farnam Street Omaha, NE 68102

**Questions for Auditing Microbiological Laboratories** 

Audit Date-----5-18-2001

<u>General</u>

Name & location of lab: Laboratoire Departemental Veterinaire Finistere, -ZA.De Creach Gwen, 22,Avenue de la plage des guex, 29334, Quimper, France.

Private or gov't lab? Government

How & when was accreditation obtained? 1999, by Accreditation Authority of France.

*How & how often is accreditation maintained?* Ministry of Agriculture Accreditation Department. Minimum once and maximum twice a year.

When and how is payment for analysis provided? By Inspection authorities and customers and clients.

Are results released before payment is received? Yes

Methodology for HACCP Salmonella samples (regulatory labs)

Does this lab analyze HACCP Salmonella samples? Yes

How is HACCP Salmonella samples received & recorded? Samples are collected and mailed and brought to the laboratory by the clients.

IS HACCP Salmonella samples analyzed on the day of receipt? No (within one week).

What method(s) is used for HACCP Salmonella samples? AOAC

Is it a qualitative method (i.e. +/- result)? Yes Are HACCP ground beef samples analyzed for Salmonella? N/A

What is the size of the ground beef test portion?N/AWhat buffer is used:Buffered Peptone Water

Sponge samples for Salmonella?SwabsPoultry rinsates for Salmonella?yes

Salmonella ground beef sample homogenates? N/A

Analytical controls are employed for each set of samples. Yes How are HACCP Salmonella results expressed? Positive or negative How are HACCP Salmonella results recorded: logbook

Data sheets/work sheets?

And/or Log books?

How and to whom are HACCP Salmonella results reported? By mail to government veterinary officials.

Are "check" samples periodically used to test the proficiency of the lab and analysts for Salmonella testing? Yes

Methodology for HACCP generic E. coli samples (in-plant or other private labs)

Does this lab analyze HACCP generic E. coli samples? Yes

How are HACCP E. coli samples received & recorded? Samples are collected by establishment and sent to the laboratory.

Are HACCP E. coli samples analyzed on the day of receipt? No - within one week

What method is used for HACCP generic E. coli samples? AOAC

Is it a quantitative method? Yes

What buffer is used: Buffered Peptone Water

*E.* coli sponge samples? Swabs Poultry rinsates for generic *E.* coli? yes

Are analytical controls are employed for each set of samples? Yes

How are HACCP E. coli results calculated and/or expressed? Quantitative=cfu/sqcm

How are E. coli results recorded: Log books

data sheets/work sheets?

Log books?

How and to whom are HACCP E. coli results reported? By mail to establishment management and government inspection authorities.

Are "check" samples periodically used to test the proficiency of the lab and analysts for generic E. coli testing? Yes

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS	REVI	EW DATE	ESTABLISHMENT NO. AND NAM	NE			CNME CITY Strasbo		
INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM	05-	11-2001	67-482-21, ETS.George Bruc	k			COUNT		
NAME OF REVIEWER Dr.S.P.Singh		E OF FORE Charles Fe	I IGN OFFICIAL ITERA				ceptable/	Unac	ceptab
CODES (Give an appropriate code for each A = Acceptable $M = Margin$			l below) U = Unacceptable	N	= Not Reviewe	d	O = 00	bes not a	apply
1. CONTAMINATION CONTROL		Cross c	ontamination prevention	28 A	Formulation	IS		<u>.</u>	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipm	ent Sanitizing	29 A	Packaging (	nateri	als		56 A
Water potability records	01 A	Product	handling and storage	30 A	Laboratory	confir	mation		57 A
Chlorination procedures	02 0	Product	reconditioning	31 A	Label appro	vals			58 A
Back siphonage prevention	03 A	Product	transportation	32 A	Special labe	el clair	ns		59 A
Hand washing facilities	04 A	(d) E	STABLISHMENT SANITATION PROGRA		Inspector m	onito	ring		60 A
Sanitizers	05 A	Effectiv	e maintenance program	33 A	Processing	sched	ules		61 A
Establishments separation	06 A	Preoper	ational sanitation	34 A	Processing	equip	ment		62 A
Pestno evidence	07 A	Operati	onal sanitation	35 A	Processing	record	is		63 A
Pest control program	08 A	Waste	disposal	36 A	Empty can	inspec	ction		64 A
Pest control monitoring	09 A	1	2. DISEASE CONTROL		Filling procedures				65 A
Temperature control	10 A	Animal	identification	37 0	Container c	losure	e exam		66 A
Lighting	11 A	Antemo	ortem inspec. procedures	36 0	Interim con	tainer	handling	9	67 A
Operations work space	12 A	Antemo	ortem dispositions	39 0	Post-proces	sing t	nandling		68 A
Inspector work space	13 A	Human	e Slaughter	40	Incubation	proce	dures		69 A
Ventilation	14 A	Postmo	rtem inspec. procedures	41	Process. de	fect a	ctions -	plant	70 A
Facilities approval	15 A	Postmo	rtem dispositions	42 0	Processing	contro	ol insp	ection	71 A
Equipment approval	16 A	Conder	nned product control	43 0	5. COMPLI	ANCE/E	CON. FRAU	CONTRO	л Ю
(b) CONDITION OF FACILITIES EQUIPMEN		Restrict	ted product control	44	Export prod	uct id	entificat	ion	72 A
Over-product ceilings	17 A	Returne	ed and rework product	45 0	Inspector ve	erifica	tion		73 A
Over-product equipment	18 A		3. RESIDUE CONTROL	J	Export certi	ficate	s		74 A
Product contact equipment	19 A	Residue	e program compliance	46 0	Single stand	lard			75 A
Other product areas (inside)	20 A	Sampli	ng procedures	47	Inspection :	superv	vision		76 A
Dry storage areas	21 A	Residu	e reporting procedures	48 0	Control of s	ecurit	y items		77 A
Antemortem facilities	27	Approv	al of chemicals, etc.	49 0	Shipment s	ecurity	Y		78 A
Welfare facilities	23 A	Storage	e and use of chemicals	50 A	Species ver	ificati	on		79 A
Outside premises	24 A	1	. PROCESSED PRODUCT CONTROL		"Equal to" :	status			80 A
(c) PRODUCT PROTECTION & HANDLIN	 G	Pre-bor	ning trim	51 A	Imports				81 A
Personal dress and habits	25 A	Bonele	ss meat reinspection	52 A	1				$\mathbf{T}$
Personal hygiene practices	26 A	Ingredi	ents identification	53 A	1		<u> </u>		1
Sanitary dressing procedures	27	Contro	l of restricted ingredients	54 A	COMMEN	TS MAD	E ON REVE		†

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS	REVI	EW DATE	ESTABLISHMENT NO. AND NAM		CITY Josselin		
FOREIGN PLANT REVIEW FORM	05-	15-2001	56-091-01, Olympig			COUNTRY France	
NAME OF REVIEWER Dr.S.P.Singh		E OF FORE Langville	IGN OFFICIAL Jerome		EVALUATION X Acceptable	Ceptable/ Unaci	ceptable
CODES (Give an appropriate code for each A = Acceptable M = Margi			l below) U = Unacceptable	N	= Not Reviewed	O = Does not a	 ррly
1. CONTAMINATION CONTROL		Cross c	ontamination prevention	28 A	Formulations		55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipm	ent Sanitizing	29 A	Packaging materials		
Water potability records	01 A	Product	handling and storage	30 A	Laboratory confirmation		
Chlorination procedures	02 0	Product	reconditioning	31 A	Label approvals		58 O
Back siphonage prevention	03 A	Product	transportation	32 A	Special label claims		
Hand washing facilities	04 A	(d) E	STABLISHMENT SANITATION PROGRA		Inspector monito	ring	60 0
Sanitizers	05 A	Effectiv	re maintenance program	33 A	Processing sched	lules	61 0
Establishments separation	06 A	Preope	rational sanitation	34 A	Processing equip	ment	62 0
Pest no evidence	07 A	Operati	onal sanitation	35 A	Processing record	ds	63 0
Pest control program	08 A	Waste	disposal	36 A	Empty can inspection		
Pest control monitoring	09 A		2. DISEASE CONTROL		Filling procedures		
Temperature control	10 A	Animal	identification	37 A	Container closure	e exam	65 0 66 0
Lighting	11 A	Antemo	ortem inspec. procedures	38 A	Interim container	handling	67 0
Operations work space	12 A	Antemo	ortem dispositions	39 A	Post-processing I	nandling	68 0
Inspector work space	13 A	Human	e Slaughter	40 A	Incubation proces	dures	69 0
Ventilation	14 A	Postmo	rtem inspec. procedures	41 A	Process. defect actions plant		
Facilities approval	15 A	Postmo	rtem dispositions	42 A	Processing control inspection		
Equipment approval	16 A	Conder	nned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTR		
(6) CONDITION OF FACILITIES EQUIPME	 NT	Restric	ted product control	44	Export product id	entification	72 0
Over-product ceilings	17 A	Return	ed and rework product	45 A	Inspector verifica	tion	73 A
Over-product equipment	18 A		3. RESIDUE CONTROL	<u> </u>	Export certificate	s	74 0
Product contact equipment	19 A	Residu	e program compliance	46 A	Single standard		75 A
Other product areas (inside)	20 A	Sampli	ng procedures	47 A	Inspection superv	rision	76 A
Dry storage areas	21 A	Residu	e reporting procedures	48 A	Control of securit	y items	77 A
Antemortem facilities	22 A	Approv	al of chemicals, etc.	49 A	Shipment security	Ŷ	78 A
Welfare facilities	23 A	Storage	e and use of chemicals	50 A	Species verification	on	79 0
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status		80 A
(c) PRODUCT PROTECTION & HANDLIN		Pre-bo	ning trim	51 A	Imports		81 O
Personal dress and habits	25 A	Bonele	ss meat reinspection	52 A	1		
Personal hygiene practices	26 A	Ingredi	ents identification	53 0	1		
Sanitary dressing procedures	27	Contro	l of restricted ingredients	54 O	COMMENTS MAD	E ON REVERSE	

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		EW DATE	ESTABLISHMENT NO. AND NAM	ME	CITY LampaulGuim	lia
FOREIGN PLANT REVIEW FORM		16-2001	29-097-01, ETS.Lous Gad		COUNTRY France	
NAME OF REVIEWER Dr.S.P.Singh		E OF FORE Eric David	IGN OFFICIAL		EVALUATION Acceptable Acceptable/ Re-review	ecceptab
CODES (Give an appropriate code for each $A = Acceptable$ $M = Margin$			1 below) U = Unacceptable	N	= Not Reviewed 0 = Does not	aρρίγ
1. CONTAMINATION CONTROL		Cross o	contamination prevention	28 M	Formulations	55 0
(a) BASIC ESTABLISHMENT FACILITIES		Equipm	ent Sanitizing	29 M	Packaging materials	56 0
Water potability records	01 A	Product	t handling and storage	30 A	Laboratory confirmation	57 0
Chlorination procedures	02 0	Product	t reconditioning	31 M	Label approvals	58 0
Back siphonage prevention	03 A	Product	t transportation	32 A	Special label claims	59 0
Hand washing facilities	04 A	(d) E	STABLISHMENT SANITATION PROGRA		Inspector monitoring	60 0
Sanitizers	05 M	Effectiv	ve maintenance program	33 A	Processing schedules	61 0
Establishments separation	06 A	Preope	rational sanitation	34 A	Processing equipment	62 0
Pestno evidence	07 A	Operati	ional sanitation	35 A	Processing records	63 0
Pest control program	08 A	Waste	disposal	36 A	Empty can inspection	64 0
Pest control monitoring	09 A		2. DISEASE CONTROL		Filling procedures	65 0
Temperature control	10 A	Animal	identification	37 A	Container closure exam	66 0
Lighting	11 A	Antemo	ortem inspec. procedures	36 A	Interim container handling	67 0
Operations work space	12 A	Antemo	ortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Human	e Slaughter	40 A	Incubation procedures	69 0
Ventilation	14 A	Postmo	ortem inspec. procedures	41 M	Process. defect actions - plant	70 0
Facilities approval	15 A	Postmo	ortem dispositions	42 A	Processing control inspection	71 0
Equipment approval	16 A	Conder	nned product control	43 A	5. COMPLIANCE/ECON, FRAUD CONTR	
(6) CONDITION OF FACILITIES EQUIPMEN	τ	Restric	ted product control	44 A	Export product identification	72 0
Over-product ceilings	17 M	Return	ed and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 M		3. RESIDUE CONTROL		Export certificates	74 0
Product contact equipment	19 A	Residu	e program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampli	ng procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residu	e reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approv	al of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage	e and use of chemicals	50 A	Species verification	79 0
Outside premises	24 A		4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDUNG	 3	Pre-bo	ning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Bonele	ss meat reinspection	52 A		1
Personal hygiene practices	26 A	Ingredi	ents identification	\$ <b>3</b>		1
Sanitary dressing procedures	27	Contro	l of restricted ingredients	54 O	COMMENTS MADE ON REVERSE	1

FOREIGN PLANT REVIEW FORM (reverse)	1	ESTABLISHMENT NO. AND NAME 29-097-01, ETS.Lous Gad	 CITY LampaulGuimlia COUNTRY France
NAME OF REVIEWER Dr.S.P.Singh	NAME OF FORE Dr.Eric David		ceptable/ review Unacceptable

#### COMMENTS:

M=05-Bleeding Station knife sanitizer was not maintained at 82C temperature and overflow was not provided when necessary to prevent organic build-up.

M=17- Dripping condensation was observed in one of the carcass cooler- no direct product contamination.

M=18- Overhead structures (ducts, beams and pipes) were observed to contain dirt and residue material.

M = 28- Cross- Contamination of head and feet of carcasses from dressing floor was observed, and workers boot was touching head area of carcass.

M = 29-Automatic split saws were not provided hot water for sanitizing purposes, therefore saws were not sanitized between carcasses during dressing procedures.

M = 31- Products from floor in cutting and boning area were collected together to be reconditioned later. No re-conditioning table and light were provided.

M=41- Mandibular Lymph nodes on heads were not examined properly and only one side (left) was cut examined .

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		EW DATE	ESTABLISHMENT NO. AND NAI	ME		CITY Chat-Du-Faou	
FOREIGN PLANT REVIEW FORM	05-	17-2001	29-027-01, ETS.Socopa			COUNTRY France	
NAME OF REVIEWER Dr.S.P.Singh		E OF FORE	IGN OFFICIAL Seach		EVALUATION Acceptable	ceptable/ Unacc	cepta
CODES (Give an appropriate code for each $A = Acceptable$ $M = Marginger$			f below) U = Unacceptable	N	= Not Reviewed	0 = Does not a	pply
1. CONTAMINATION CONTROL		Cross c	contamination prevention	28 A	Formulations		55
(a) BASIC ESTABLISHMENT FACILITIES		Equipm	ent Sanitizing	29 A	Packaging mater	ials	56
Water potability records	01 A	Product	handling and storage	30 A	Laboratory confi	rmation	57
Chlorination procedures	02 0	Product	reconditioning	31 A	Label approvals		58
Back siphonage prevention	03 A	Product	t transportation	32 A	Special label claims		
Hand washing facilities	04 A	(d) E	STABLISHMENT SANITATION PROGRA		Inspector monito	ring	60
Sanitizers	05 A	Effectiv	e maintenance program	33 A	Processing schedules		
Establishments separation	06 A	Preope	rational sanitation	34 A	Processing equipment		
Pestno evidence	07 A	Operati	onal sanitation	35 A	Processing records		
Pest control program	06 A	Waste disposal			Empty can inspection		
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedure:		64
Temperature control	10 A	Animal identification			Container closure	e exam	66
Lighting	11	Antemo	ortem inspec. procedures	36 A	Interim container	handling	6
Operations work space	12 A	Anton ottom dispositions 39		39 A	Post-processing	handling	68
Inspector work space	13 A	Human	e Slaughter	40 A	Incubation proce	dures	65
Ventilation	14 A	Postmo	ortem inspec. procedures	41 A	Process. defect a	ictions – plant	70
Facilities approval	15 A	Postmo	ortem dispositions	42 A	Processing control	ol inspection	71
Equipment approval	16 A	Conder	nned product control	43 A	5. COMPLIANCE/E	CON. FRAUD CONTRO	я
(b) CONDITION OF FACILITIES EQUIPMEN	דא	Restric	ted product control	44 A	Export product ic	lentification	72
Over-product ceilings	17 A	Returne	ed and rework product	45 A	Inspector verifica	tion	73
Over-product equipment	16 A		3. RESIDUE CONTROL	_,▌	Export certificate	S	74
Product contact equipment	19 A	Residue	e program compliance	46 A	Single standard		79
Other product areas (inside)	20 A	Sampli	ng procedures	47 A	Inspection super-	vision	76
Dry storage areas	21 A	Residu	e reporting procedures	48 A	Control of securi	ty items	"
Antemortem facilities	22 A	Approv	al of chemicals, etc.	49 A	Shipment securit	γ	78
Welfare facilities	23 A	Storage	e and use of chemicals	50 A	Species verificati	on	75
Outside premises	24 A	1 .	4. PROCESSED PRODUCT CONTROL		"Equal to" status		80
(c) PRODUCT PROTECTION & HANDLIN	 IG	Pre-boo	ning trim	51 A	Imports	······································	81
Personal dress and habits	25 A	Bonele	ss meat reinspection	52 A		·····	$\left  \right $
Personal hygiene practices	26 A	Ingredi	ents identification	53 0			1
Sanitary dressing procedures	27	Contro	l of restricted ingredients	54 O	COMMENTS MAD	E ON REVERSE	1

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U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		EW DATE ESTABLISHMENT NO. AND NAM 18-2001 29-225-01, ETS. Henaff	ΛE	CITY Pouldreuzic		
FOREIGN PLANT REVIEW FORM	05-	18-2001 29-225-01, ETS. Henaff		COUNTRY France		
NAME OF REVIEWER Dr.S.P.Singh		E OF FOREIGN OFFICIAL Peleton G Henri		EVALUATION Acceptable Acceptable/ Re-review Una	cceptab	
CODES (Give an appropriate code for each $A = Acceptable$ $M = Marginger$			N :	= Not Reviewed O = Does not	apply	
1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A	
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 <b>A</b>	Packaging materials	56 A	
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation		
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals		
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims		
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRA		Inspector monitoring		
Sanitizers	05 <b>A</b>	Effective maintenance program	33 A	Processing schedules	61 A	
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A	
Pestno evidence	07 A	Operational sanitation	35 A	Processing records		
Pest control program	80	Waste disposal	36 A	Empty can inspection		
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 A	
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 A	
Lighting	11	Antemortem inspec. procedures	36 A	Interim container handling	67 A	
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A	
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 A	
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions plan		
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control inspection	71 A	
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON, FRAUD CONTR	оL	
(b) CONDITION OF FACILITIES EQUIPME	NT	Restricted product control	44 A	Export product identification	72 A	
Over-product ceilings	17 <u></u>	Returned and rework product	45 A	Inspector verification	73 A	
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A	
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A	
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 A	
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A	
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A	
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A	
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A	
(c) PRODUCT PROTECTION & HANDLIN	 IG	Pre-boning trim	51 A	Imports	81 A	
Personal dress and habits	25 A	Boneless meat reinspection	52 A		1	
Personal hygiene practices	26 A	Ingredients identification	53 A		1	
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A	COMMENTS MADE ON REVERSE	1	

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS	REVIEW DATE ESTABLISHMENT NO. AND NAME			CITY Dax			
FOREIGN PLANT REVIEW FORM	05-4	05-21-2001 40-088-03, ETS.Junca			COUNTRY France		
NAME OF REVIEWER Dr.S.Singh`	Dr. I	Dongny M			EVALUATION Acceptable Acceptable/ Unacceptable		
CODES (Give an appropriate code for each $A = Acceptable$ $M = Marginger$			below} U = Unacceptable	N	= Not Reviewed 0 = Does not a	αρρίγ	
1. CONTAMINATION CONTROL		Cross contamination prevention		28 M	Formulations	55 A	
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials	56 A	
Water potability records	01 A	Product handling and storage			Laboratory confirmation	57 A	
Chlorination procedures	02 0	Product	reconditioning	31 A	Label approvals	58 A	
Back siphonage prevention	03 A	Product	transportation	32 A	Special label claims		
Hand washing facilities	04 M	(d) ES	STABUSHMENT SANITATION PROGRA	4M	Inspector monitoring		
Sanitizers	05 A	Effective maintenance program			Processing schedules		
Establishments separation	06 A	Preoperational sanitation			Processing equipment		
Pest no evidence	07 A	Operational sanitation			Processing records		
Pest control program	80 A	Waste disposal			Empty can inspection		
Pest control monitoring	60 V	2. DISEASE CONTROL			Filling procedures		
Temperature control	10 A	Animal	identification	37 0	Container closure exam		
Lighting	11 A	Antemortem inspec. procedures		36 0	Interim container handling		
Operations work space	12 A	Antemortem dispositions			Post-processing handling		
Inspector work space	13 A	Humane Slaughter		40 0	Incubation procedures		
Ventilation	14 A	Postmortem inspec. procedures		41 0	Process. defect actions plant		
Facilities approval	15 A	Postmortem dispositions		42 0	Processing control inspection		
Equipment approval	16 A	Condemned product control		43 0	5. COMPLIANCE/ECON. FRAUD CONTRO		
(6) CONDITION OF FACILITIES EQUIPMEN	L vт			44	Export product identification		
Over-product ceilings	17 A	Returne	ed and rework product	45 0			
Over-product equipment	18 A		3. RESIDUE CONTROL	Export certificates		73 M 74 A	
Product contact equipment	19 A	Residue	e program compliance	46 0	Single standard		
Other product areas (inside)	20 M	Sampling procedures		47			
Dry storage areas	21 A	Residue reporting procedures		48 0			
Antemortem facilities	22 A	Approv	al of chemicals, etc.	49 0	Shipment security		
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification		
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status		
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports	81 A	
Personal dress and habits	25 A	Bonele	ss meat reinspection	52 A		<u> </u>	
Personal hygiene practices	26 A	Ingredi	ents identification	53 A		1	
Sanitary dressing procedures	27	Control	of restricted ingredients	54 A	COMMENTS MADE ON REVERSE	1	

FOREIGN PLANT REVIEW FORM (reverse)		ESTABLISHMENT NO. AND NAME	CITY Dax
	05-21-2001	40-088-03, ETS.Junca	COUNTRY France
NAME OF REVIEWER Dr.S.Singh`	NAME OF FORE Dr. Dongny, N		cceptable/ Unacceptable

#### COMMENTS:

M = 04-Hand washing facilities in change room (locker-bathroom) was not supplied with hot water and in other places hand wash facilities warm water supply was not in operation.

M=20- Freezer and cooler doors broken in the corners-need attention.

M=28-Condensation in cooking area over open kettles was observed.

M=33-Effective maintenance program was lacking to keep flaking paint and damaged doors etc.

M=35-Operational sanitation was not documented or recorded in SSOP.

M=60 and 73-Inspector from DGAI visits only when needed for export-no daily inspection coverage.

M = 76-Inspection supervision for processing facilities provided two or three times a year.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS	REVI	W DATE	ESTABLISHMENT NO. AND NAN	<i>N</i> E	——————————————————————————————————————	CITY Limothe	
FOREIGN PLANT REVIEW FORM	05-	21-2001	40-143-50, Earl Les Genets			COUNTRY France	
NAME OF REVIEWER Dr.S.P.Singh		E OF FORE	IGN OFFICIAL riaud		EVALUATION X Acceptable	Ceptable/ Unac	cceptable
CODES (Give an appropriate code for each $A = Acceptable$ $M = Margin$			l below) U = Unacceptable	N	= Not Reviewed	0 = Does not a	apply
1. CONTAMINATION CONTROL		Cross o	contamination prevention	28 N	Formulations		55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipm	ent Sanitizing	29 N	Packaging materi	als	56 O
Water potability records	01 <b>A</b>	Product handling and storage			Laboratory confirmation		
Chlorination procedures	02 0	Product reconditioning			Label approvals		
Back siphonage prevention	03 A	Product	t transportation	32 N	Special label claims		59 O
Hand washing facilities	04 A	(d) E	STABUSHMENT SANITATION PROGRA	.M	Inspector monitor	60 0	
Sanitizers	05 A	Effectiv	e maintenance program	EE A	Processing sched	ules	61 O
Establishments separation	.06 ▲	Preoperational sanitation			Processing equipment		62 O
Pest no evidence	07 A	Operational equitation			Processing records		63 O
Pest control program	08 A	Waste disposal			Empty can inspection		
Pest control monitoring	09 A	·	2. DISEASE CONTROL	.1	Filling procedures		65 0
Temperature control	10 A	Animal	identification	37 N	Container closure	exam	66 0
Lighting	11	Antemortem inspec. procedures			Interim container handling		67 0
Operations work space	12 A	Antemortem dispositions			Post-processing handling		68 O
Inspector work space	13 0	Humane Slaughter			Incubation procedures		
Ventilation	14 A	Postmortem inspec. procedures			Process. defect actions plant		70 0
Facilities approval	15 A	Postmo	ortem dispositions	42 N	Processing contro	ol inspection	71 0
Equipment approval	16 A	Conder	nned product control	43 NA	5. COMPLIANCE/EC	CON. FRAUD CONTRO	)L
(b) CONDITION OF FACILITIES EQUIPMEN	π	Restric	ted product control	44 N	Export product id	entification	72 0
Over-product ceilings	17 A	Returne	ed and rework product	45 •N	Inspector verificat	tion	73 0
Over-product equipment	18 A		3. RESIDUE CONTROL	J	Export certificates	s	74 0
Product contact equipment	19 A	Residu	e program compliance	46 0	Single standard		75 A
Other product areas (inside)	20 A	Sampli	ng procedures	47	Inspection superv	ision	76 A
Dry storage areas	21 A	Residu	e reporting procedures	48 0	Control of securit	y items	77 A
Antemortem facilities	22 A	Approv	al of chemicals, etc.	49 0	Shipment security	/	78 A
Welfare facilities	23 A	Storage	e and use of chemicals	50 0	Species verification	DU	79 0
Outside premises	24 A		4. PROCESSED PRODUCT CONTROL		"Equal to" status		80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 0	Imports		81 O
Personal dress and habits	25 N	Bonele	ss meat reinspection	52 0		<u></u>	
Personal hygiene practices	26 N	Ingredi	ents identification	53 0		·········	
Sanitary dressing procedures	27 N	Contro	l of restricted ingredients	54 O	COMMENTS MADE	E ON REVERSE	
			H, WHICH MAY BE USED UNTIL EXHAUSTED		I	A PRO Software by Dekin	 \a

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE	REVI	EW DATE	ESTABLISHMENT NO. AND NAM	CITY Brive	·····		
INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM	05	5-22-01	19-031-02, Rougie Bizac Inter	ternational		COUNTRY France	
NAME OF REVIEWER Dr.S.P.Singh		AE OF FOREIGN OFFICIAL EVALUATION Nicholas Calvagrac Xacceptable				ceptable/	cceptable
CODES (Give an appropriate code for each r A = Acceptable M = Margina	1 review	item listed	·	 N	= Not Reviewed	0 = Does not a	
		1	contamination prevention	28	Formulations		55
1. CONTAMINATION CONTROL	]		·	A 29			A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		<b>A</b>	Packaging materia	als	56 A
Water potability records	01 A	Product	t handling and storage	30 A	Laboratory confirm	mation	57 A
Chlorination procedures	02 0	Product	t reconditioning	31 A	Label approvals		58 A
Back siphonage prevention	03 <b>A</b>	Product	t transportation	32 A	Special label claims		59 A
Hand washing facilities	04 <b>A</b>	(d) E!	STABLISHMENT SANITATION PROGRAM		Inspector monitor	60 A	
Sanitizers	05 A	Effectiv	ve maintenance program	33 A	Processing schedules		61 A
Establishments separation	06 A	Preoper	rational sanitation	34 A	Processing equipment		62 A
Pest no evidence	07 A	Operati	ional sanitation	35 A	Processing record	ls	63 A
Pest control program	08 <b>A</b>	Waste disposal			Empty can inspection		64 A
Pest control monitoring	09 A		2. DISEASE CONTROL	J	Filling procedures		65 A
Temperature control	10 A	Animal	identification	37 0	Container closure	exam	66 A
Lighting	11 A	Antemortem inspec. procedures			Interim container	handling	67 A
Operations work space	12 A	Antemo	ortem dispositions	39 O	Post-processing h	landling	68 A
Inspector work space	13 A	Human	e Slaughter	40 0	Incubation proced	Jures	69 A
Ventilation	14 A	Postmortem inspec. procedures		41 0	Process. defect a	ctions - plant	70 A
Facilities approval	15 A	Postmo	Postmortem dispositions <sup>42</sup> Processing		Processing contro	ol inspection	71 A
Equipment approval	16 A	Conder	Condemned product control		5. COMPLIANCE/ECON. FRAUD CONTRO		і Э
(6) CONDITION OF FACILITIES EQUIPMENT	л л	Restricted product control		43 0 44 0	Export product ide	entification	72 A
Over-product ceilings	17 A	Returne	ed and rework product	45 0	Inspector verification		73 A
Over-product equipment	18 A	·	3. RESIDUE CONTROL	J	Export certificates	s	74 A
Product contact equipment	19 A	Residue	e program compliance	46 0	Single standard		75 A
Other product areas (inside)	20 A	Samplir	ng procedures	47 0			76 A
Dry storage areas	21 A	Residue reporting procedures		48 0	Control of security items		77 A
Antemortem facilities	22 0	Approval of chemicals, etc.		49 0	Shipment security		78 A
Welfare facilities	23 A	Storage	e and use of chemicals	50 A	Species verification		79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		J	"Equal to" status		80 A
(c) PRODUCT PROTECTION & HANOLING	;	Pre-boning trim		51 A	Imports	······ · · · · · · · · · · · · · · · ·	81 A
Personal dress and habits	25 A	Bonele	ss meat reinspection	52 A			
Personal hygiene practices	26 A	Ingredi	ents identification	53 A			
Sanitary dressing procedures	27	Contro	l of restricted ingredients	54 A	COMMENTS MADE	E ON REVERSE	

.

# Attachment G

#### Food Directorate

Dr. Sally STRATMOEN Acting Director International Policy Staff Office of Policy, Program Development and Evaluation FSIS-USDA

Mission: International Health Coordination Sector: Sanitary and Phytosanitary Multilateral Agreements

Our Reference: MCSI/CR/NF/0214 File handled by: Catherine ROGY Position: 84.56 Subject: FSIS mission in France from May 7 through Mau 23, 2001

Paris

Dear Madam Director,

In a letter dated last November 16<sup>th</sup> you sent me the final audit report project concerning the French inspection system for poultry and slaughter animal meats carried out from May 7 through May 23, 2001.

During this mission, it was pointed out that the Louis Gad establishment located in Lampaul Guimiliau (accreditation number 29-297-01) and the Junca establishment located at 40100 Dax (accreditation number 40-088-03) were to undergo a reevaluation by their supervising inspector.

I am pleased to inform you of the corrective measures that have been implemented following Dr. Singh's remarks.

#### 1) Junca establishment

- a) Bathrooms: the sinks now have hot water and the temperature of said water is monitored daily.
- b) Cold chambers doors: the door to the raw materials reception area has been restored.
- c) Condensation: the evacuation of steam from water that stagnates in the cooking area was improved by strengthening its extraction and installing steam pipes in the room.
- d) SSOP registrations: a daily sanitation control of the facilities was implemented.

(handwritten) IPD/575 BW Feb 15, 2002

251, rue de Vaugirard 75732 PARIS CEDEX 15 (illegible – line cut off)

#### 2) Louis Gad establishment

- a) As of the beginning of July 2001, the blood is collected individually and in a semi-automated fashion using trocars and the trocars are cleaned and sterilized in hot water between each pig.
- b) The ventilation was modified in the cold chamber in question.
- c) The cleanliness of the overhead structures is currently satisfactory.
- d) The rail that carries the carcasses at the dressing level has been elevated and guides have been installed.
- e) The automatic saws were equipped with a hot water sterilization system prior to the expert's visit. There is no visible display of the temperature to guarantee this. This fact has not changed to date.
- f) Improvement of the singeing posts (dedicated locations, singeing material, specific bars, training of certain members of personnel, drafting of instructions and registrations, implementation of safety precautions, increased lighting are anticipated).
- g) The submandibular ganglion inspection post has been modified in order to make it possible to study two ganglions at once.

Furthermore, as far as the evaluation and inspection procedures are concerned for the establishments authorized to export to the United States, in particular the frequency of the inspections, I would appreciate it if my services could meet with you to discuss this matter. We will be in touch concerning this matter in the very near future.

Very truly yours,

Copy to: Mr. Checchi-Lang, SANCO General Director, European Commission Mr. Besa L. Kotati, Minister-Counselor of Agricultural Affairs, United States Embassy