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

Mr. Brian Macdonald
Director, Meat Inspection Division
Australian Quarantine and Inspection Service (AQIS)
Department of Primary Industries and Energy
Edmund Barton Building
Canberra ACT 2601
Australia

JUL 13 2001

Dear Mr. Macdonald:

Enclosed is a copy of the Final report of the Food Safety and Inspection Service (FSIS) October 16 through November 3, 2000, audit of Australia's meat inspection system. We received AQIS' June 5, 2001, letter providing comments on the Draft Final report of the same audit. This letter has been incorporated into the Final report as Attachment "G."

We appreciate your thorough review of the FSIS audit findings and the corrective actions taken to ensure that meat products exported to the United States meet U.S. import requirements. If you have any questions regarding the audit or need additional information, please contact Ms. Sally Stratmoen, Chief, Equivalence Section, International Policy Staff. Her telephone number is 202-720-6400 and her facsimile number is 202-720-7990.

Sincerely,

/s/ Rick Harries

Karen Stuck, Acting Director
International Policy Staff
Office of Policy, Program Development
and Evaluation

Enclosure

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 AUSTRALIA

OCTOBER 16 THROUGH NOVEMBER 3, 2000

July 2, 2001

## INTRODUCTION

### Background

This report reflects information that was obtained during an audit of Australia's meat inspection system from October 16 through November 3, 2000. Nine of the ninety-nine establishments certified to export meat to the United States were audited. Eight of these were slaughter establishments; the other one was conducting processing operations.

The last audit of the Australian meat inspection system was conducted in May 1999. Twelve establishments were audited: nine were acceptable (est. 04, 07, 294, 239, 235, 558, 716, 648, 1013), and three were evaluated as acceptable/re-review (est. 517, 688, 1471). The concerns from that audit were:

- Zero tolerance defects were observed in the boning room and/or the carcass coolers of five plants (est. 235, 716, 648, 688, and 239).
- Condensation was observed above exposed product and/or above exposed product trafficways (est. 04 and 517).
- Rodent activity was noted inside 5 establishments (est. 558, 1013, 517, 07, and 688).
- Plastic strip doors were in use in exposed product areas in most establishments.

During this new audit, two of the establishments recommended for re-review, were included in the new itinerary, (est. 517 and 688); the other (Est.1471) was not certified at the time. These deficiencies were addressed in this year's audit and were found to be corrected.

Any meat or meat product produced in a U.S.-certified establishment is eligible to be exported to the United States.

During January 1 to October 31, 2000, Australian establishments exported nearly 619 million pounds of beef and slightly more than 82 million pounds of mutton, lamb and goat to the U.S. Port-of-entry (POE) rejections were for processing defects (0.02% of the total), miscellaneous defects (0.007%), contamination (0.05%), pathological defects (0.02%), and transportation damage and missing shipping marks (0.17% combined).

## PROTOCOL

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

inspection headquarters facilities and at other sites. Establishments for on site audit were selected from a group of 25 drawn from the total list of 99 U.S.-certified establishments. Nine were selected for on site visits and the remainder of the 25 were chosen for centralized records audits. This selection was based on volume of product exported, the volume of border rejections and the reason thereof, previous problems and managerial units. The third was conducted by on-site visits to establishments. The fourth was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella*.

Australia'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 *Escherichia coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

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 meat inspection officials (this was the case with one establishment—see below).

## RESULTS AND DISCUSSION

### Summary

Based on the performance of the individual establishments, Australia's "In-Plant Inspection System Performance" was evaluated as In-Plant System Controls In Place.

Effective inspection system controls were found to be in place in eight of the establishments audited; one establishment, 533, was found to be unacceptable. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli,* are discussed later in this report.

The last audit of the Australian meat inspection system was conducted in May 1999. Twelve establishments were audited: nine were acceptable (est. 04, 07, 294, 239, 235, 558, 716, 648, 1013), and three were evaluated as acceptable/re-review (est. 517, 688, 1471). The concerns from that audit were: zero tolerance defects were observed in the boning room and/or the carcass coolers of five plants (Est. 235, 716, 648, 688, and 239); condensation was observed above exposed product and/or above exposed product trafficways (Est. 04 and 517); rodent activity was noted inside 5 establishments (Est. 558, 1013, 517, 07, and 688); plastic strip doors were in use in exposed product areas in most establishments. During this new audit, the auditor determined that these deficiencies were found to be corrected.

Entrance Meeting

On October 16, an entrance meeting was held in the Canberra offices of the Australian Quarantine and Inspection Service (AQIS), and was attended by Dr. Peter Miller, National Operations Manager; Dr. Jonathan Webber, Manager National Residue Program; Mr. Steven Bailey, National Manager Program Services; Mr. Neville Spencer, Executive Officer; Dr. Kiran Johar, Principal Veterinary Officer; Mr. Paul Smith, Meat Inspection Division Branch; Mr. Stephen Richardson, Technical Services Branch; Dr. Charles Bosgra, Area Technical Manager Coordinator (Canberra); Dr. Peter McGregor, Senior Area Technical Manager (Victoria); Dr. Roger Turner, Senior Area Technical Manager (New South Wales); Dr. Steven Tidswell, Area Technical Manager (Canberra); and Dr. M. Douglas Parks, International Audit Staff Officer, USDA FSIS.

Topics of discussion included the following:

1. The sampling rate of sheep for generic *E. coli* and *Salmonella* testing.

2. The size of the sampling site on bobby calves.

3. The discarding of small stock heads before post mortem inspection.

4. Annual assessment of HACCP program.

5. The equivalence of HACCP and the Meat Hygiene Assessment (MHA) scheme.

6. Systems Audits.

7. Information on rejected imports at U.S. Import Stations.

8. The monitoring of Good Manufacturing Practices (GMP).

Headquarters Audit

There have been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Australia's inspection system in May 1999.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters of the inspection service, at a district or regional office or other convenient site. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.

- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels, and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

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

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Australia as eligible to export meat products to the United States were full-time AQIS employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Ninety-nine establishments were certified to export meat products to the United States at the time this audit was conducted. Nine establishments were visited for on-site audits. In eight of the nine establishments visited, both AQIS inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited, approved, and private laboratories.
2. Intra-laboratory quality assurance procedures, including sample handling.

3. Methodology.

The Chemical Residue Laboratory in Brisbane was audited on October 31, 2000. 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 frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done.

The check sample program did meet FSIS requirements. Check samples for each analyst are on a monthly basis and samples between laboratories are run every three months. Australia's microbiological testing for *Salmonella* was being performed in private laboratories. One of these, the Symbio Alliance Laboratory in Brisbane was audited. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories have been accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported to the government or simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the nine establishments:

Beef and sheep slaughter and boning – five establishments (195, 533, 640, 688, and 3085)
Beef slaughter and boning – one establishment (517)
Beef and sheep processing only – one establishment (297)
Sheep slaughter and boning – two establishments (2309 and 572)

SANITATION CONTROLS

Based on the on-site audits of establishments, Australia's inspection system had controls in place for basic establishment facilities, condition of facilities, product protection and handling and establishment sanitation program.

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 only occasional minor variations except as listed below and in establishment 533. In this establishment critical deficiencies were noted on carcasses after the pre-boning trim, in the boning room and on product after vacuum packaging. One general problem seen was that there was no effective system in place for detection and removal of urine spillage on sheep carcasses during the dressing procedure.

Cross-Contamination

1. A carcass trim operator was observed not sanitizing hands and equipment between carcasses for pathology removals (Est. 533).
2. Poison baits for rodent control in production related areas (Est. 517), no monitoring devices for rodents inside the plant (Est. 297 and 572).
3. Feces found on product after pre-trim station (Est. 195, 533 and 3085).
4. Adrenal glands found on sheep carcasses in the cooler and in the boning room (Est. 572 and 640).
5. Condensate was observed above exposed product (Est. 688 and 3085).
6. Product conveyor belt was not constructed for cleaning underneath (Est. 2309).
7. The correct procedure for re-conditioning of dropped carcasses was not being followed (Est. 533 and 688).
8. No effective procedure for detection and removal of urine spillage on sheep carcasses (Est. 533, 572, 2309, and 3085).

Dressing procedures of carcasses in the slaughter department need more attention to detail and correction (see above 3, 4, 7 and 8). The establishment and inspection management rely heavily on "Work Instructions" to be in place. More monitoring and corrections of these Work Instructions is needed. The Work Instructions are the directions given to each job position holder, telling him/her how to accomplish the duties associated with their position. These are verbally given and a written sheet of the instructions is usually posted near the work position.

## ANIMAL DISEASE CONTROLS

Australia'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.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

## RESIDUE CONTROLS

Australia's National Residue Testing Plan for 2000 was being followed, and was on schedule. The Australian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

## SLAUGHTER/PROCESSING CONTROLS

The Australian inspection system had controls in place to ensure adequate operations in humane handling, slaughter, ingredients, formulations and packaging materials.

HACCP Implementation

All establishments approved to export meat 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 exception of establishment 297. In this establishment's HACCP hazard analysis and plan, the temperature of the incoming carcasses was not addressed (see attachment B questions 3 & 6).

Testing for Generic *E. coli*

Australia has adopted the FSIS regulatory requirements for *E. coli* testing.

Eight of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C). Two problems that exist in many establishments (attachment C questions 3 & 7) are the location of sampling in the plant is not written in the testing plan and the carcass selection was not completely random.

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements. Australia has requested an equivalence determination from FSIS regarding the generic *E. coli* sampling requirements for minor species, e.g., sheep and goats.

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

ENFORCEMENT CONTROLS

Inspection System Controls

The AQIS inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and

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

Testing for *Salmonella* Species

Eight 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).

Australia has adopted the FSIS regulatory requirements for *Salmonella* testing.

The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements.

Species Verification Testing

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

MONTHLY REVIEWS

These reviews were being performed by the Australian equivalent of Circuit Supervisors. They are titled Area Technical Managers (ATM). All were veterinarians with several years of experience.

The internal review program was not applied equally to both export and non-export establishments. Domestic establishments are not mandatoraly reviewed by Senior ATM's every month. Internal review visits were not always announced in advance, and were conducted, at times by individuals and at other times by a team of reviewers, at least once monthly, and sometimes more often if indicated. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central AQIS offices in Canberra, and were routinely maintained on file for a minimum of three years.

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 and be reinstated, a group is empowered to conduct an in-depth review. This is called a "Cross Review", and the results are reported to Headquarters Managers for evaluation; they formulate a plan for corrective actions and preventive measures.

After observing the internal reviewers' activities in the field, the auditor was confident in their professionalism, thoroughness, and knowledge of U.S. requirements, and in the effectiveness of Australia's internal review program as a whole.

Enforcement Activities

Set out below is information obtained through AQIS Compliance & Investigation, Compliance Information System (CIS). AQIS Compliance & Investigation(C&I) seeks to warrant the integrity of AQIS export and quarantine systems by delivering an investigation and monitoring service designed to encourage industry compliance with the legislative requirements for the movement of goods into or out of Australia. The following statistics deal with the meat related issues during the year 2000.

Founded prosecutions for meat related issues—4

These were in relation to issues prior to the animals being processed under EU requirements. Fines imposed by the courts ranged from $300 to $500.

Prosecutions pending---1

This is a forgery matter relating to trade description. The product was described in a manner that did not meet the requirements of the importing country. There is no issue over the integrity of the product in terms of food safety.

Letters of warning issued---8

These letters were issued for matters including the types of vehicle carrying product, issues between AQIS staff and plant management, and minor hygiene matters.

Matters referred to external agencies---8

These matters were for issues dealt with by State Departments/Jurisdictions, e.g. theft related issues (Police), animal welfare (RSPCA), and matters under the jurisdiction of State Departments of Agriculture.

Investigations conducted and matter resolved through discussions with management---23

These were matters that included such issues as seals being accidentally broken, door security, animal welfare, where Compliance Investigators negotiated directly with plant management.

EXIT MEETING

An exit meeting was conducted in Canberra on November 3, 2000. The participants were: Mr. Brian MacDonald, Acting Executive Director; Dr. Peter Miller, Acting National Manager Technical Services, Dr. Jack Haslam, Manager Meat and Food Policy; Dr. Jonathan Webber, Manager National Residue Program; Mr. Barry Shirley, Compliance and Investigations; Mr. Russ Smith, Compliance and Investigations; Dr. Kiran Johar, Principal Veterinary Officer; Mr. Neville Spencer, Executive Officer; Mr. Bob Biddle, General Manager Food Policy; Mr. Paul Smith, Meat Inspection; Mr. Martin Holmes, Meat Inspection and Food Service; Dr. Charles Bosgra, Area Technical Manager Coordinator; Dr. Albert Cobb, Senior Area Technical Manager; Dr. Steve Tidswell, Area Technical Manager (Canberra); Dr. Peter McGregor, Senior Area Technical Manager; (Victoria); Dr. Roger Turner, Senior Area Technical Manager (New South Wales); and Dr. M. Douglas Parks, International Audit Staff Officer, USDA FSIS.

The following topics were discussed:

1. Establishment 533 delistment and the paperwork for this procedure and the latest methodology for relistment. The Australian inspection officials understand this procedure and will comply.

2. Rodent baits in production or production related areas. The response was Australian inspection officials stated that there will be immediate removal and replacement with monitoring devices.
3. Zero tolerances for feces, ingesta, milk and urine with emphasis on feces and urine. Australian inspection officials will form a managerial group to solve this problem immediately.
4. Dropped carcass procedures were not being conducted as written. Monitoring will be followed to assure correct response.
5. Dressing procedures for slaughter establishments need improvement. Meat Hygiene Assessment System will require this to improve.
6. No post mortem inspection on the heads of small stock. Their response was that it was submitted to International Policy Staff, FSIS and they were awaiting a response from them.
7. The rate of sampling for generic *E. coli* testing for sheep. They responded that it had been submitted to International Policy Staff, FSIS and they were awaiting a response.
9. Lateral retropharyngeal lymph nodes of beef heads are not being incised on routine post mortem procedures. The Australian inspection officials said that this has been referred to International Policy Staff, FSIS and they are awaiting a reply.

## CONCLUSION

The inspection system of Australia was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. The major problem observed was the lack of policy or procedure to address urine spillage on sheep carcasses during the slaughter process. Nine establishments were audited: eight were acceptable, one was evaluated as unacceptable. The deficiencies encountered during the on-site establishment audits, in those establishments which were found to be acceptable, were adequately addressed to the auditor's satisfaction.

Dr. M. Douglas Parks
International Audit Staff Officer

(signed) *Dr. M. Douglas Parks*

ATTACHMENTS

A. Data collection instrument for SSOPs
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 form
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report (when it becomes available)
H. FSIS Response(s) to Foreign Country Comments (when it becomes available)

*Attachment A*

## Data Collection Instrument for 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 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 individuals 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.

The results of these evaluations were as follows:

| Est. # | 1.Written program addressed | 2. Pre-op sanitation addressed | 3. Oper. sanitation addressed | 4. Contact surfaces addressed | 5. Fre-quency addressed | 6. Respons-ible indiv. identified | 7. Docu-mentation done daily | 8. Dated and signed |
|---|---|---|---|---|---|---|---|---|
| 2309 | √ | √ | √ | √ | √ | √ | √ | √ |
| 517 | √ | √ | √ | √ | √ | √ | √ | no |
| 688 | √ | √ | √ | √ | √ | √ | √ | √ |
| 3085 | √ | √ | √ | √ | √ | √ | √ | √ |
| 297 | √ | √ | √ | √ | √ | √ | √ | √ |
| 533 | √ | √ | √ | √ | √ | √ | √ | √ |
| 572 | √ | √ | no | √ | √ | √ | √ | √ |
| 640 | √ | √ | √ | √ | √ | √ | √ | √ |
| 195 | √ | √ | √ | √ | √ | √ | √ | √ |

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 217 | √ | √ | √ | √ | √ | √ | √ | √ |
| 790 | √ | √ | √ | √ | √ | √ | no | √ |
| 180 | √ | √ | √ | √ | √ | √ | √ | √ |
| 1614 | √ | √ | √ | √ | √ | √ | √ | √ |
| 1027 | √ | √ | √ | no | √ | √ | √ | √ |
| 2291 | √ | √ | √ | √ | √ | √ | √ | √ |
| 101 | √ | √ | √ | √ | √ | √ | √ | √ |
| 04 | √ | √ | √ | √ | √ | √ | √ | √ |
| 239 | √ | √ | √ | √ | √ | √ | √ | √ |
| 1983 | √ | √ | √ | √ | √ | √ | √ | √ |
| 521 | √ | √ | √ | √ | √ | √ | √ | √ |
| 612 | √ | √ | √ | √ | √ | √ | √ | √ |
| 952 | √ | √ | √ | √ | √ | √ | √ | √ |
| 39 | √ | √ | √ | √ | √ | √ | √ | √ |
| 15 | √ | √ | √ | √ | √ | √ | √ | √ |

*Attachment B*

**Data Collection Instrument for HACCP Programs**

Each of the establishments approved to export meat products to the U.S. as 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 included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. 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.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
10. The plan describes corrective actions taken when a critical limit is exceeded.
11. The HACCP plan was validated using multiple monitoring results.
10. 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.
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

| Est. # | 1. Flow diagram | 2. Hazard analysis conducted | 3. All hazards identified | 4. Use & users included | 5. Plan for each hazard | 6. CCPs for all hazards | 7. Monitoring is specified | 8. Corr. actions are described | 9. Plan validated | 10.Adequate verific. procedures | 11.Adequate documentation | 12. Dated and signed |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 2309 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 517 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | no |
| 688 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | no |
| 3085 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 195 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 297 | √ | √ | no | √ | √ | no | √ | √ | √ | √ | √ | √ |
| 533 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 572 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 640 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

| | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 217 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 790 | √ | √ | √ | √ | √ | no | √ | no | √ | √ | √ | √ |
| 180 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 1027 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 2291 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 101 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 004 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 239 | √ | √ | √ | √ | √ | √ | no | √ | √ | √ | √ | √ |
| 1983 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 521 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 612 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 1614 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 952 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 039 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 015 | √ | √ | √ | √ | √ | √ | no | √ | √ | √ | √ | √ |

*Attachment C*

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

Each establishment (except Est. 297, which was a processed product facility) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. 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.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are 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.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

| Est. # | 1.Written procedure | 2. Sampler designated | 3.Sampling location given | 4. Predomin. species sampled | 5. Sampling at the req'd freq. | 6. Proper site or method | 7. Sampling is random | 8. Using AOAC method | 9. Chart or graph of results | 10. Results are kept at least 1 yr |
|---|---|---|---|---|---|---|---|---|---|---|
| 2309 | √ | √ | √ | √ | √ | √ | no | √ | √ | √ |
| 517 | √ | √ | no | √ | √ | √ | √ | √ | √ | √ |
| 688 | √ | √ | no | √ | √ | √ | √ | √ | √ | √ |
| 3085 | √ | √ | no | √ | √ | √ | √ | √ | √ | √ |
| 195 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 297 | not | applic | able | | | | | | | |
| 533 | √ | √ | no | √ | √ | √ | no | √ | √ | √ |
| 572 | √ | √ | no | √ | no | √ | √ | √ | √ | √ |
| 640 | √ | √ | no | √ | √ | √ | √ | √ | √ | √ |

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

| | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| 217 | √ | √ | √ | √ | √ | √ | no | √ | √ | √ |
| 790 | √ | √ | no | √ | √ | √ | no | √ | √ | √ |
| 180 | √ | √ | no | √ | √ | √ | √ | √ | √ | √ |
| 1027 | √ | √ | no | √ | √ | √ | √ | √ | √ | √ |
| 1614 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 2291 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 101 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 004 | √ | no | no | √ | √ | √ | √ | √ | √ | √ |
| 239 | √ | √ | no | √ | √ | √ | √ | √ | √ | √ |
| 1983 | not | applic | able | | | | | | | |
| 521 | √ | √ | no | √ | √ | √ | √ | √ | √ | √ |
| 612 | √ | √ | no | √ | √ | √ | √ | √ | √ | √ |
| 952 | √ | √ | √ | √ | √ | √ | √ | √ | √ | √ |
| 039 | not | applic | able | | | | | | | |
| 015 | √ | √ | no | √ | √ | √ | √ | √ | √ | √ |

*Attachment D*

## Data Collection Instrument for *Salmonella* testing

Each slaughter establishment (except est. 297 which was processed product establishment) was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. 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 proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

| Est. # | *1. Testing as required* | *2. Carcasses are sampled* | 3. Ground product is sampled | 4. Samples are taken randomly | 5. Proper site and/or proper prod. | 6. Violative est's stop operations |
|---|---|---|---|---|---|---|
| 2309 | √ | √ | N/A | no | √ | √ |
| 517 | √ | √ | N/A | √ | √ | √ |
| 688 | √ | √ | N/A | no | √ | √ |
| 3085 | √ | √ | N/A | no | √ | √ |
| 195 | √ | √ | N/A | √ | √ | √ |
| 297 | not | applicable | | | | |
| 533 | √ | √ | N/A | √ | √ | √ |
| 572 | √ | √ | N/A | √ | √ | √ |
| 640 | √ | √ | N/A | √ | √ | √ |

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

| | | | | | | |
|---|---|---|---|---|---|---|
| 217 | √ | √ | N/A | √ | √ | √ |
| 790 | √ | √ | N/A | no | √ | √ |
| 180 | √ | √ | N/A | √ | √ | √ |
| 1027 | √ | √ | N/A | √ | √ | √ |
| 1614 | √ | √ | N/A | √ | √ | √ |
| 2291 | √ | √ | N/A | √ | √ | √ |
| 101 | √ | √ | N/A | no | √ | √ |
| 004 | √ | √ | N/A | √ | √ | √ |
| 239 | √ | √ | N/A | √ | √ | √ |
| 1983 | not | applicable | | | | |
| 521 | √ | √ | N/A | √ | √ | √ |
| 612 | √ | √ | N/A | √ | √ | √ |
| 952 | √ | √ | N/A | √ | √ | √ |
| 039 | not | applicable | | | | |
| 015 | √ | √ | N/A | √ | √ | √ |

Attachment E

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

## FOREIGN COUNTRY LABORATORY REVIEW

| REVIEW DATE | NAME OF FOREIGN LABORATORY |
|---|---|
| 10/31/00 | Symbio Alliance |

| FOREIGN GOV'T AGENCY | CITY & COUNTRY | ADDRESS OF LABORATORY |
|---|---|---|
| AQIS | Canberra, Australia | 47 Manilla Street<br>East Brisbane, Queensland 4169 |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL |
|---|---|
| Dr. M. Douglas Parks | Dr. Mark Dawson Manager |

| | Residue Code/Name ▶ | | | 100 | 111 | 300 | 200 | 203 | 408 | 500 | 800 | 902 | SPP xref | E. coli | Salm |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SAMPLING PROCEDURES | REVIEW ITEMS | ITEM # | EVALUATION CODE | | | | | | | | | | | | |
| | Sample Handling | 01 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Sampling Frequency | 02 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Timely Analyses | 03 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Compositing Procedure | 04 | | A | A | A | A | A | A | A | A | A | O | O | O |
| | Interpret Comp Data | 05 | | A | A | A | A | A | A | A | A | A | O | O | O |
| | Data Reporting | 06 | | A | A | A | A | A | A | A | A | A | A | A | A |
| ANALYTICAL PROCEDURES | Acceptable Method | 07 | EVALUATION CODE | A | A | A | A | A | A | A | A | A | A | A | A |
| | Correct Tissue(s) | 08 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Equipment Operation | 09 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Instrument Printouts | 10 | | A | A | A | A | A | A | A | A | A | A | A | A |
| QUALITY ASSURANCE PROCEDURES | Minimum Detection Levels | 11 | EVALUATION CODE | A | A | A | A | A | A | A | A | A | A | A | A |
| | Recovery Frequency | 12 | | A | A | A | A | A | A | A | A | A | O | O | O |
| | Percent Recovery | 13 | | A | A | A | A | A | A | A | A | A | O | O | O |
| | Check Sample Frequency | 14 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | All analyst w/Check Samples | 15 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Corrective Actions | 16 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | International Check Samples | 17 | | A | A | A | A | A | A | A | A | A | A | A | A |
| REVIEW PROCEDURES | Corrected Prior Deficiencies | 18 | EVAL. CODE | | | | | | | | | | | | |
| OTHER REVIEW | | 19 | EVAL. CODE | | | | | | | | | | | | |
| | | 20 | | | | | | | | | | | | | |

SIGNATURE OF REVIEWER: M Douglas Parks

DATE: Oct 31, 2000

| FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)* | REVIEW DATE | NAME OF FOREIGN LABORATORY |
|---|---|---|
| | 10-31-00 | Symbio Alliance |

| FOREIGN GOV'T AGENCY | CITY & COUNTRY | ADDRESS OF LABORATORY |
|---|---|---|
| AQIS | Canberra, Aust. | 47 Manilla St East Brisbane, Qld 4169 |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL |
|---|---|
| Dr M. Douglas Parks | Dr Mark Dawson |

| RESIDUE CODES | ITEM NO. | COMMENTS |
|---|---|---|
| | | Microbiology--- NATA accredited each 2 years<br>Residues---Check samples freom NATA 1 to 4 times a year<br>Micorbiology standards and testing methods---<br>Salmonella--Australian standard method AS1766.2.51991<br>E. soli--Petri Film<br><br>Check samples internal all anaylsts -- 2 times a year<br>external from NATA 1-4 times a year |

Attachment E

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

**FOREIGN COUNTRY LABORATORY REVIEW**

| REVIEW DATE | NAME OF FOREIGN LABORATORY |
|---|---|
| 10/31/00 | Chemical Residue Lab |

| FOREIGN GOV'T AGENCY | CITY & COUNTRY | ADDRESS OF LABORATORY |
|---|---|---|
| Department of Primary Industry, Qld | Brisbane, Queensland | 665 Fairfield Road<br>Yeerongpilly, Qld 4105 |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL |
|---|---|
| Dr. M. Douglas Parks | Dr. Ross Norris, Lab. Director |

| | Residue Code/Name ▶ | | | 100 | 111 | 300 | 200 | 203 | 400 | 500 | 800 | 902 | SPC Verf. | E. coli | Salm. |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | REVIEW ITEMS | ITEM # | EVALUATION CODE | | | | | | | | | | | | |
| SAMPLING PROCEDURES | Sample Handling | 01 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Sampling Frequency | 02 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Timely Analyses | 03 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Compositing Procedure | 04 | | A | A | A | A | A | A | A | A | A | O | O | O |
| | Interpret Comp Data | 05 | | A | A | A | A | A | A | A | A | A | O | O | O |
| | Data Reporting | 06 | | A | A | A | A | A | A | A | A | A | A | A | A |
| ANALYTICAL PROCEDURES | Acceptable Method | 07 | EVALUATION CODE | A | A | A | A | A | A | A | A | A | A | A | A |
| | Correct Tissue(s) | 08 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Equipment Operation | 09 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Instrument Printouts | 10 | | A | A | A | A | A | A | A | A | A | A | A | A |
| QUALITY ASSURANCE PROCEDURES | Minimum Detection Levels | 11 | EVALUATION CODE | A | A | A | A | A | A | A | A | A | A | A | A |
| | Recovery Frequency | 12 | | A | A | A | A | A | A | A | A | A | O | O | O |
| | Percent Recovery | 13 | | A | A | A | A | A | A | A | A | A | O | O | O |
| | Check Sample Frequency | 14 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | All analyst w/Check Samples | 15 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | Corrective Actions | 16 | | A | A | A | A | A | A | A | A | A | A | A | A |
| | International Check Samples | 17 | | A | A | A | A | A | A | A | A | A | A | A | A |
| REVIEW PROCEDURES | Corrected Prior Deficiencies | 18 | EVAL. CODE | | | | | | | | | | | | |
| OTHER REVIEW | | 19 | EVAL CODE | | | | | | | | | | | | |
| | | 20 | | | | | | | | | | | | | |

SIGNATURE OF REVIEWER: M Douglas Parks

DATE: Oct 31, 2000

| FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)* | REVIEW DATE | NAME OF FOREIGN LABORATORY |
|---|---|---|
| | 10/31/00 | Chemical Residue Lab |

| FOREIGN GOV'T AGENCY | CITY & COUNTRY | ADDRESS OF LABORATORY |
|---|---|---|
| Department of Primary Industry, Qld | Brisbane, Queensland | 665 Fairfield Road<br>Yeerongpilly, Qld 4105 |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL |
|---|---|
| Dr. M. Douglas Parks | Dr. Ross Norris, Lab. Director |

| RESIDUE CODES | ITEM NO. | COMMENTS |
|---|---|---|
| | | Accredited every two years by National Assn. Testing Authority (NATA)<br>Check samples---internal anaylsts monthly<br>between labs--every three months<br>other countries---none<br>Samples of violations are retained indefinately, normals discared after four weeks<br>Samples from meat plants are sent to facilities in Canberra --collected for one week then sent to the approiate labatory to be tested and reported directly to the meat plant. |

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

**FOREIGN PLANT REVIEW FORM**

| REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|
| 19 October 2000 | Belandra Propriety LTD<br>30 Industry Park Drive Est 688 | Brooklyn, Vic.<br>COUNTRY<br>Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Peter McGregor, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

| | | | | | |
|---|---|---|---|---|---|
| **1. CONTAMINATION CONTROL** | | Cross contamination prevention | 28 U | Formulations | 55 A |
| **(a) BASIC ESTABLISHMENT FACILITIES** | | Equipment Sanitizing | 29 A | Packaging materials | 56 A |
| Water potability records | 01 A | Product handling and storage | 30 A | Laboratory confirmation | 57 A |
| Chlorination procedures | 02 A | Product reconditioning | 31 A | Label approvals | 58 A |
| Back siphonage prevention | 03 A | Product transportation | 32 A | Special label claims | 59 A |
| Hand washing facilities | 04 A | **(d) ESTABLISHMENT SANITATION PROGRAM** | | Inspector monitoring | 60 O |
| Sanitizers | 05 A | Effective maintenance program | 33 A | Processing schedules | 61 O |
| Establishments separation | 06 A | Preoperational sanitation | 34 A | Processing equipment | 62 O |
| Pest --no evidence | 07 A | Operational sanitation | 35 A | Processing records | 63 O |
| Pest control program | 08 A | Waste disposal | 36 A | Empty can inspection | 64 O |
| Pest control monitoring | 09 A | **2. DISEASE CONTROL** | | Filling procedures | 65 O |
| Temperature control | 10 A | Animal identification | 37 A | Container closure exam | 66 O |
| Lighting | 11 A | Antemortem inspec. procedures | 38 A | Interim container handling | 67 O |
| Operations work space | 12 A | Antemortem dispositions | 39 A | Post-processing handling | 68 O |
| Inspector work space | 13 A | Humane Slaughter | 40 A | Incubation procedures | 69 O |
| Ventilation | 14 A | Postmortem inspec. procedures | 41 A | Process. defect actions -- plant | 70 O |
| Facilities approval | 15 A | Postmortem dispositions | 42 A | Processing control -- inspection | 71 O |
| Equipment approval | 16 A | Condemned product control | 43 A | **5. COMPLIANCE/ECON. FRAUD CONTROL** | |
| **(b) CONDITION OF FACILITIES EQUIPMENT** | | Restricted product control | 44 A | Export product identification | 72 A |
| Over-product ceilings | 17 M | 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 N |
| Outside premises | 24 A | **4. PROCESSED PRODUCT CONTROL** | | "Equal to" status | 80 N |
| **(c) PRODUCT PROTECTION & HANDLING** | | Pre-boning trim | 51 A | Imports | 81 N |
| Personal dress and habits | 25 A | Boneless meat reinspection | 52 A | | |
| Personal hygiene practices | 26 A | Ingredients identification | 53 A | | |
| Sanitary dressing procedures | 27 A | Control of restricted ingredients | 54 A | | |

| FOREIGN PLANT REVIEW FORM (reverse) | REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|---|
| | 19 October 2000 | Belandra Propriety LTD 30 Industry Park Drive Est 688 | Brooklyn, Vic. |
| | | | COUNTRY Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Peter McGregor, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

COMMENTS:

SSOP--Preventative action not being recorded.

HACCP--Preventative action not being recorded. Clarification needed for critical limits and corrective action in plan. No specific commitment to the program by an on-site authority.

E.coli testing-- Method of sample selection not random.

Salmonella testing--Method of sample selection not random.

28--The hand operated switch at the cutting rail had large amounts of residues from previous day's uses. Floor traffic boots and boots for use on the eviserating table had an area of common touch.

17--Heavily beaded condensate was observed above exposed carcasses in a hall trafficway.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

# FOREIGN PLANT REVIEW FORM

| REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|
| 18 October 2000 | Rockdale Beef Propriety Ltd<br>Regulator Road Yanco, NSW Est. 517 | Yanco, NSW |
| | | COUNTRY<br>Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Roger Turner, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable 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 A | Packaging materials | 56 A |
| Water potability records | 01 A | Product handling and storage | 30 A | Laboratory confirmation | 57 A |
| Chlorination procedures | 02 A | Product reconditioning | 31 A | Label approvals | 58 A |
| Back siphonage prevention | 03 A | Product transportation | 32 A | Special label claims | 59 A |
| Hand washing facilities | 04 A | **(d) ESTABLISHMENT SANITATION PROGRAM** | | Inspector monitoring | 60 A |
| Sanitizers | 05 A | Effective maintenance program | 33 A | Processing schedules | 61 O |
| Establishments separation | 06 A | Preoperational sanitation | 34 A | Processing equipment | 62 O |
| Pest --no evidence | 07 A | Operational sanitation | 35 A | Processing records | 63 O |
| Pest control program | 08 U | Waste disposal | 36 A | Empty can inspection | 64 O |
| Pest control monitoring | 09 A | **2. DISEASE CONTROL** | | Filling procedures | 65 O |
| Temperature control | 10 A | Animal identification | 37 A | Container closure exam | 66 O |
| Lighting | 11 A | Antemortem inspec. procedures | 38 A | Interim container handling | 67 O |
| Operations work space | 12 A | Antemortem dispositions | 39 A | Post-processing handling | 68 O |
| Inspector work space | 13 A | Humane Slaughter | 40 A | Incubation procedures | 69 O |
| Ventilation | 14 A | Postmortem inspec. procedures | 41 A | Process. defect actions -- plant | 70 O |
| Facilities approval | 15 A | Postmortem dispositions | 42 A | Processing control -- inspection | 71 O |
| Equipment approval | 16 A | Condemned product control | 43 A | **5. COMPLIANCE/ECON. FRAUD CONTROL** | |
| **(b) CONDITION OF FACILITIES EQUIPMENT** | | Restricted product control | 44 A | Export product identification | 72 A |
| Over-product ceilings | 17 A | 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 U | Residue program compliance | 46 A | Single standard | 75 N |
| 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 N |
| 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 N |
| **(c) PRODUCT PROTECTION & HANDLING** | | Pre-boning trim | 51 A | Imports | 81 N |
| Personal dress and habits | 25 A | Boneless meat reinspection | 52 A | | |
| Personal hygiene practices | 26 A | Ingredients identification | 53 A | | |
| Sanitary dressing procedures | 27 A | Control of restricted ingredients | 54 A | | |

| FOREIGN PLANT REVIEW FORM (reverse) | REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|---|
| | 18 October 2000 | Rockdale Beef Propriety Ltd<br>Regulator Road Yanco, NSW Est. 517 | Yanco, NSW<br>COUNTRY<br>Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Roger Turner, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

COMMENTS:

SSOP--Preventative action not being recorded. Pre-operational sanitation report for 16 Oct 2000 reported as "highly unsatisfactory" and no action was recorded. No specific commitment to the program by an on-site authority.

HACCP--Preventative action not being recorded. No specific commitment to the program by an on-site authority.

E. coli testing--The procedure does not designate the plant location for sample collecting.

08--Poison baits, for rodent control, were located in production related areas.

19--Double stunning of animals needs to be addressed for solution and correction.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

# FOREIGN PLANT REVIEW FORM

| REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|
| 17 October 2000 | Fletcher International LTD<br>Lot 1, Yarrandale Road EST 2309 | Dubbo, NSW |
| | | COUNTRY<br>Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Roger Turner, Senior AMT | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

| | | | | | |
|---|---|---|---|---|---|
| **1. CONTAMINATION CONTROL** | | Cross contamination prevention | 28 U | Formulations | 55 A |
| **(a) BASIC ESTABLISHMENT FACILITIES** | | Equipment Sanitizing | 29 A | Packaging materials | 56 A |
| Water potability records | 01 A | Product handling and storage | 30 A | Laboratory confirmation | 57 A |
| Chlorination procedures | 02 A | Product reconditioning | 31 A | Label approvals | 58 A |
| Back siphonage prevention | 03 A | Product transportation | 32 A | Special label claims | 59 A |
| Hand washing facilities | 04 A | **(d) ESTABLISHMENT SANITATION PROGRAM** | | Inspector monitoring | 60 A |
| Sanitizers | 05 A | Effective maintenance program | 33 A | Processing schedules | 61 O |
| Establishments separation | 06 A | Preoperational sanitation | 34 A | Processing equipment | 62 O |
| Pest --no evidence | 07 A | Operational sanitation | 35 A | Processing records | 63 O |
| Pest control program | 08 A | Waste disposal | 36 A | Empty can inspection | 64 O |
| Pest control monitoring | 09 A | **2. DISEASE CONTROL** | | Filling procedures | 65 O |
| Temperature control | 10 A | Animal identification | 37 A | Container closure exam | 66 O |
| Lighting | 11 A | Antemortem inspec. procedures | 38 A | Interim container handling | 67 O |
| Operations work space | 12 A | Antemortem dispositions | 39 A | Post-processing handling | 68 O |
| Inspector work space | 13 A | Humane Slaughter | 40 A | Incubation procedures | 69 O |
| Ventilation | 14 A | Postmortem inspec. procedures | 41 A | Process. defect actions -- plant | 70 O |
| Facilities approval | 15 A | Postmortem dispositions | 42 A | Processing control -- inspection | 71 O |
| Equipment approval | 16 A | Condemned product control | 43 A | **5. COMPLIANCE/ECON. FRAUD CONTROL** | |
| **(b) CONDITION OF FACILITIES EQUIPMENT** | | Restricted product control | 44 A | Export product identification | 72 A |
| Over-product ceilings | 17 A | 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 M | 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 & HANDLING** | | Pre-boning trim | 51 A | Imports | 81 A |
| Personal dress and habits | 25 A | Boneless meat reinspection | 52 A | | |
| Personal hygiene practices | 26 A | Ingredients identification | 53 A | | |
| Sanitary dressing procedures | 27 A | Control of restricted ingredients | 54 A | | |

| FOREIGN PLANT REVIEW FORM (reverse) | REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|---|
| | 17 October 2000 | Fletcher International LTD<br>Lot 1, Yarrandale Road EST 2309 | Dubbo, NSW<br>COUNTRY<br>Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Roger Turner, Senior AMT | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

COMMENTS:

SSOP--Preventative action not being recorded.

HACCP--Preventative action not being recorded.

E. coli testing--Carcasses selected for sampling were placed in a different place in the cooler rather than being left within the regular population of the cooler during the cooling process.

Salmonella testing--Carcass selection was based on the E.coli carcass selection and not an independent selection.

28--Urine spillage detection for carcasses was not always adequately addressed and therefore not properly trimmed.

19--Exposed product conveyor belts in the boning room were not constructed so that they could be cleaned underneath.

28--There was no procedure in place for handling abcesses on the hot-boning production line. This was revealed when an abcess was discovered during the audit.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

# FOREIGN PLANT REVIEW FORM

| REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|
| 30 October 2000 | Kilcoy Pastoral Co. LTD<br>Winya Est. 640 | Kilcoy, Qnld |
| | | COUNTRY<br>Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. John Langbridge, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable 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 A | Packaging materials | 56 A |
| Water potability records | 01 A | Product handling and storage | 30 A | Laboratory confirmation | 57 A |
| Chlorination procedures | 02 A | Product reconditioning | 31 A | Label approvals | 58 A |
| Back siphonage prevention | 03 A | Product transportation | 32 A | Special label claims | 59 M |
| Hand washing facilities | 04 A | **(d) ESTABLISHMENT SANITATION PROGRAM** | | Inspector monitoring | 60 A |
| Sanitizers | 05 A | Effective maintenance program | 33 A | Processing schedules | 61 O |
| Establishments separation | 06 A | Preoperational sanitation | 34 A | Processing equipment | 62 O |
| Pest --no evidence | 07 A | Operational sanitation | 35 U | Processing records | 63 O |
| Pest control program | 08 A | Waste disposal | 36 A | Empty can inspection | 64 O |
| Pest control monitoring | 09 A | **2. DISEASE CONTROL** | | Filling procedures | 65 O |
| Temperature control | 10 A | Animal identification | 37 A | Container closure exam | 66 O |
| Lighting | 11 A | Antemortem inspec. procedures | 38 A | Interim container handling | 67 O |
| Operations work space | 12 A | Antemortem dispositions | 39 A | Post-processing handling | 68 O |
| Inspector work space | 13 A | Humane Slaughter | 40 M | Incubation procedures | 69 O |
| Ventilation | 14 A | Postmortem inspec. procedures | 41 A | Process. defect actions -- plant | 70 O |
| Facilities approval | 15 A | Postmortem dispositions | 42 A | Processing control -- inspection | 71 O |
| Equipment approval | 16 A | Condemned product control | 43 A | **5. COMPLIANCE/ECON. FRAUD CONTROL** | |
| **(b) CONDITION OF FACILITIES EQUIPMENT** | | Restricted product control | 44 A | Export product identification | 72 A |
| Over-product ceilings | 17 A | 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 N |
| **(c) PRODUCT PROTECTION & HANDLING** | | Pre-boning trim | 51 A | Imports | 81 N |
| Personal dress and habits | 25 A | Boneless meat reinspection | 52 A | | |
| Personal hygiene practices | 26 A | Ingredients identification | 53 A | | |
| Sanitary dressing procedures | 27 U | Control of restricted ingredients | 54 A | | |

| FOREIGN PLANT REVIEW FORM (reverse) | REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|---|
| | 30 October 2000 | Kilcoy Pastoral Co. LTD<br>Winya Est. 640 | Kilcoy, Qnld |
| | | | COUNTRY<br>Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. John Langbridge, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

COMMENTS:

SSOP--Preventative action is not being recorded.

HACCP--Preventative action is not being recorded.

E. coli testing--The procedure does not designate the plant location for sample collecting.

27--Whole and partial adrenal glands were left in sheep carcasses, if carcasses are shipped intact the glands go with the carcasses.

27--No system in place for urine spillage detection and removal in the sheep slaughter department.

35--An employee was creating an aerosol from the floor with hose spray under the sheep carcasses in the slaughter department.

40--The floor of the beef stunning box was not level causing uneven footing for the animal and somtimes causes the animal to fall.

59--Special label claim "All Natural" not accompanied by explanation "minimally processed" and "no artificial ingredients" and not approved by USDA Label Division.

| FOREIGN PLANT REVIEW FORM (reverse) | REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|---|
| | 27 October 2000 | Western Australian Meat Mkt Coop LTD<br>Great southern Highway EST 572 | Katanning, WA<br>COUNTRY<br>Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Roger Turner, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

COMMENTS:

SSOP--Preventative action is not being recorded. No written program for operational sanitation is in place.

HACCP--Preventative action is not being recorded.

E coli testing--The procedure does not specify the frequency of sampling nor the plant location for sampling.

27--Whole and partial adrenal glands were left in sheep carcasses and some are shipped intact with these glands inplace.

27--No system in place for urine spillage detection and removal in the slaughter department.

09--No monitoring devices in place inside the establishment for rodent control.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

**FOREIGN PLANT REVIEW FORM**

| REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|
| 27 October 2000 | Western Australian Meat Mkt Coop LTD<br>Great southern Highway EST 572 | Katanning, WA |
| | | COUNTRY<br>Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Roger Turner, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

**CODES** (Give an appropriate code for each review item listed below)
**A** = Acceptable **M** = Marginally Acceptable **U** = Unacceptable **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 A | Packaging materials | 56 A |
| Water potability records | 01 A | Product handling and storage | 30 A | Laboratory confirmation | 57 A |
| Chlorination procedures | 02 A | Product reconditioning | 31 A | Label approvals | 58 A |
| Back siphonage prevention | 03 A | Product transportation | 32 A | Special label claims | 59 A |
| Hand washing facilities | 04 A | **(d) ESTABLISHMENT SANITATION PROGRAM** | | Inspector monitoring | 60 A |
| Sanitizers | 05 A | Effective maintenance program | 33 A | Processing schedules | 61 O |
| Establishments separation | 06 A | Preoperational sanitation | 34 A | Processing equipment | 62 O |
| Pest --no evidence | 07 A | Operational sanitation | 35 A | Processing records | 63 O |
| Pest control program | 08 A | Waste disposal | 36 A | Empty can inspection | 64 O |
| Pest control monitoring | 09 M | **2. DISEASE CONTROL** | | Filling procedures | 65 O |
| Temperature control | 10 A | Animal identification | 37 A | Container closure exam | 66 O |
| Lighting | 11 A | Antemortem inspec. procedures | 38 A | Interim container handling | 67 O |
| Operations work space | 12 A | Antemortem dispositions | 39 A | Post-processing handling | 68 O |
| Inspector work space | 13 A | Humane Slaughter | 40 A | Incubation procedures | 69 O |
| Ventilation | 14 A | Postmortem inspec. procedures | 41 A | Process. defect actions -- plant | 70 O |
| Facilities approval | 15 A | Postmortem dispositions | 42 A | Processing control -- inspection | 71 O |
| Equipment approval | 16 A | Condemned product control | 43 A | **5. COMPLIANCE/ECON. FRAUD CONTROL** | |
| **(b) CONDITION OF FACILITIES EQUIPMENT** | | Restricted product control | 44 A | Export product identification | 72 A |
| Over-product ceilings | 17 A | 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 N |
| **(c) PRODUCT PROTECTION & HANDLING** | | Pre-boning trim | 51 A | Imports | 81 N |
| Personal dress and habits | 25 A | Boneless meat reinspection | 52 A | | |
| Personal hygiene practices | 26 A | Ingredients identification | 53 A | | |
| Sanitary dressing procedures | 27 U | Control of restricted ingredients | 54 A | | |

Attachment F

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

# FOREIGN PLANT REVIEW FORM

| REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|
| 25 October 2000 | T and R Murray Bridge Propriety LTD<br>Lagoon Road Est. 533 | Murray Bridge, SA |
| | | COUNTRY: Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Roger Turner, Senior ATM | ☐ Acceptable ☐ Acceptable/ Re-review ☒ Unacceptable |

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

| | | | | | |
|---|---|---|---|---|---|
| **1. CONTAMINATION CONTROL** | | Cross contamination prevention | 28 U | Formulations | 55 A |
| **(a) BASIC ESTABLISHMENT FACILITIES** | | Equipment Sanitizing | 29 A | Packaging materials | 56 A |
| Water potability records | 01 A | Product handling and storage | 30 A | Laboratory confirmation | 57 A |
| Chlorination procedures | 02 A | Product reconditioning | 31 U | Label approvals | 58 A |
| Back siphonage prevention | 03 A | Product transportation | 32 A | Special label claims | 59 A |
| Hand washing facilities | 04 A | **(d) ESTABLISHMENT SANITATION PROGRAM** | | Inspector monitoring | 60 A |
| Sanitizers | 05 A | Effective maintenance program | 33 A | Processing schedules | 61 O |
| Establishments separation | 06 A | Preoperational sanitation | 34 A | Processing equipment | 62 O |
| Pest --no evidence | 07 A | Operational sanitation | 35 A | Processing records | 63 O |
| Pest control program | 08 A | Waste disposal | 36 A | Empty can inspection | 64 O |
| Pest control monitoring | 09 A | **2. DISEASE CONTROL** | | Filling procedures | 65 O |
| Temperature control | 10 A | Animal identification | 37 A | Container closure exam | 66 O |
| Lighting | 11 A | Antemortem inspec. procedures | 38 A | Interim container handling | 67 O |
| Operations work space | 12 A | Antemortem dispositions | 39 A | Post-processing handling | 68 O |
| Inspector work space | 13 A | Humane Slaughter | 40 A | Incubation procedures | 69 O |
| Ventilation | 14 A | Postmortem inspec. procedures | 41 A | Process. defect actions -- plant | 70 O |
| Facilities approval | 15 A | Postmortem dispositions | 42 A | Processing control -- inspection | 71 O |
| Equipment approval | 16 A | Condemned product control | 43 A | **5. COMPLIANCE/ECON. FRAUD CONTROL** | |
| **(b) CONDITION OF FACILITIES EQUIPMENT** | | Restricted product control | 44 A | Export product identification | 72 A |
| Over-product ceilings | 17 A | 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 & HANDLING** | | Pre-boning trim | 51 U | Imports | 81 A |
| Personal dress and habits | 25 A | Boneless meat reinspection | 52 A | | |
| Personal hygiene practices | 26 A | Ingredients identification | 53 A | | |
| Sanitary dressing procedures | 27 U | Control of restricted ingredients | 54 A | | |

| FOREIGN PLANT REVIEW FORM (reverse) | REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|---|
| | 25 October 2000 | T and R Murray Bridge Propriety LTD Lagoon Road Est. 533 | Murray Bridge, SA |
| | | | COUNTRY Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Roger Turner, Senior ATM | ☐ Acceptable ☐ Acceptable/ Re-review ☒ Unacceptable |

COMMENTS:

SSOP--Preventative action not being recorded.

HACCP--Preventative action not being recorded.

E. coli testing--The procedure does not designate the plant location for sample collecting. The sample is not selected randomly.

Salmonella testing--The carcass selected for testing is next to the E.coli sample and not an indepentently selected sample.

31,51-- Beef carcass had feces on it after the pre-boning trim.. Partially boned carcass in the boning room had feces on it.

28--Vacuum packed leg-o-lamb in-box ready for shipment had feces on it. Ingesta in the buccal cavity of a beef head ready for break down.

28--No system in place for detection of urine spillage on sheep carcasses in the slaughter department.

28--A dropped carcass was returned to the rail from the floor, not trimmed, not marked and allowed to touch other carcasses.

27--An employee was observed not washing his hands, not sanitizing his knife or saw between carcasses railed out for pathology.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

# FOREIGN PLANT REVIEW FORM

| REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|
| 24 October 2000 | Westmeats Propriety LTD<br>73 High Street Est 297 | Thomastown, Vic |
| | | COUNTRY<br>Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dt. M. Douglas Parks | Dr. Roger Turner, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable 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 A | Packaging materials | 56 A |
| Water potability records | 01 M | Product handling and storage | 30 A | Laboratory confirmation | 57 A |
| Chlorination procedures | 02 A | Product reconditioning | 31 A | Label approvals | 58 A |
| Back siphonage prevention | 03 A | Product transportation | 32 A | Special label claims | 59 A |
| Hand washing facilities | 04 A | **(d) ESTABLISHMENT SANITATION PROGRAM** | | Inspector monitoring | 60 A |
| Sanitizers | 05 A | Effective maintenance program | 33 A | Processing schedules | 61 O |
| Establishments separation | 06 A | Preoperational sanitation | 34 A | Processing equipment | 62 O |
| Pest --no evidence | 07 A | Operational sanitation | 35 A | Processing records | 63 O |
| Pest control program | 08 A | Waste disposal | 36 A | Empty can inspection | 64 O |
| Pest control monitoring | 09 M | **2. DISEASE CONTROL** | | Filling procedures | 65 O |
| Temperature control | 10 A | Animal identification | 37 O | Container closure exam | 66 O |
| Lighting | 11 A | Antemortem inspec. procedures | 38 O | Interim container handling | 67 O |
| Operations work space | 12 A | Antemortem dispositions | 39 O | Post-processing handling | 68 O |
| Inspector work space | 13 A | Humane Slaughter | 40 O | Incubation procedures | 69 O |
| Ventilation | 14 A | Postmortem inspec. procedures | 41 O | Process. defect actions -- plant | 70 O |
| Facilities approval | 15 A | Postmortem dispositions | 42 O | Processing control -- inspection | 71 O |
| Equipment approval | 16 A | Condemned product control | 43 A | **5. COMPLIANCE/ECON. FRAUD CONTROL** | |
| **(b) CONDITION OF FACILITIES EQUIPMENT** | | Restricted product control | 44 A | Export product identification | 72 A |
| Over-product ceilings | 17 A | 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 N |
| **(c) PRODUCT PROTECTION & HANDLING** | | Pre-boning trim | 51 A | Imports | 81 N |
| Personal dress and habits | 25 A | Boneless meat reinspection | 52 A | | |
| Personal hygiene practices | 26 A | Ingredients identification | 53 A | | |
| Sanitary dressing procedures | 27 A | Control of restricted ingredients | 54 A | | |

| FOREIGN PLANT REVIEW FORM (reverse) | REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|---|
| | 24 October 2000 | Westmeats Propriety LTD 73 High Street Est 297 | Thomastown, Vic |
| | | | COUNTRY Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dt. M. Douglas Parks | Dr. Roger Turner, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

COMMENTS:

SSOP--Peventative action not being recorded.

HACCP--There is no designated receiving temperature in the plan (CCP) for incoming carcasses.

01--No scheduled testing of raw waters in the testing program.

09--No monitoring devices are located within the establishment for rodent control.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

# FOREIGN PLANT REVIEW FORM

| REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|
| 23 October 2000 | SBA Foods Propriety LTD Tannery Road EST 195 | Longford, Tas |
| | | COUNTRY: Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Roger Turner, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

**CODES** (Give an appropriate code for each review item listed below)
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| | | | | | |
|---|---|---|---|---|---|
| **1. CONTAMINATION CONTROL** | | Cross contamination prevention | 28 U | Formulations | 55 A |
| **(a) BASIC ESTABLISHMENT FACILITIES** | | Equipment Sanitizing | 29 A | Packaging materials | 56 A |
| Water potability records | 01 A | Product handling and storage | 30 A | Laboratory confirmation | 57 A |
| Chlorination procedures | 02 A | Product reconditioning | 31 A | Label approvals | 58 A |
| Back siphonage prevention | 03 A | Product transportation | 32 A | Special label claims | 59 A |
| Hand washing facilities | 04 A | **(d) ESTABLISHMENT SANITATION PROGRAM** | | Inspector monitoring | 60 A |
| Sanitizers | 05 A | Effective maintenance program | 33 A | Processing schedules | 61 O |
| Establishments separation | 06 A | Preoperational sanitation | 34 M | Processing equipment | 62 O |
| Pest --no evidence | 07 A | Operational sanitation | 35 A | Processing records | 63 O |
| Pest control program | 08 A | Waste disposal | 36 A | Empty can inspection | 64 O |
| Pest control monitoring | 09 A | **2. DISEASE CONTROL** | | Filling procedures | 65 O |
| Temperature control | 10 A | Animal identification | 37 A | Container closure exam | 66 O |
| Lighting | 11 A | Antemortem inspec. procedures | 38 A | Interim container handling | 67 O |
| Operations work space | 12 A | Antemortem dispositions | 39 A | Post-processing handling | 68 O |
| Inspector work space | 13 A | Humane Slaughter | 40 A | Incubation procedures | 69 O |
| Ventilation | 14 A | Postmortem inspec. procedures | 41 A | Process. defect actions -- plant | 70 O |
| Facilities approval | 15 A | Postmortem dispositions | 42 A | Processing control -- inspection | 71 O |
| Equipment approval | 16 A | Condemned product control | 43 A | **5. COMPLIANCE/ECON. FRAUD CONTROL** | |
| **(b) CONDITION OF FACILITIES EQUIPMENT** | | Restricted product control | 44 A | Export product identification | 72 A |
| Over-product ceilings | 17 A | 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 N |
| Outside premises | 24 A | **4. PROCESSED PRODUCT CONTROL** | | "Equal to" status | 80 N |
| **(c) PRODUCT PROTECTION & HANDLING** | | Pre-boning trim | 51 U | Imports | 81 N |
| Personal dress and habits | 25 A | Boneless meat reinspection | 52 A | | |
| Personal hygiene practices | 26 A | Ingredients identification | 53 A | | |
| Sanitary dressing procedures | 27 A | Control of restricted ingredients | 54 A | | |

| FOREIGN PLANT REVIEW FORM (reverse) | REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|---|
| | 23 October 2000 | SBA Foods Propriety LTD Tannery Road EST 195 | Longford, Tas |
| | | | COUNTRY Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Roger Turner, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

COMMENTS:

SSOP-31-- Maggot were discovered on pre-op sanitation and no special response was recorded. Preventative action not being recorded.

28,51--Feces was found on brisket after pre-trim station. Procedures observed for dropped carcass reconditioning was unacceptable. Boots for floor traffic and boots used on the eviserating table had a common touch area.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

**FOREIGN PLANT REVIEW FORM**

| REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|
| 20 October 2000 | Castricum Brothers Propriety LTD<br>342 Hammond Road Est. 3085 | Dandenong, Vic |
| | | COUNTRY: Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Peter McGregor, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

CODES (Give an appropriate code for each review item listed below)
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| | | | | | |
|---|---|---|---|---|---|
| **1. CONTAMINATION CONTROL** | | Cross contamination prevention | 28 U | Formulations | 55 A |
| **(a) BASIC ESTABLISHMENT FACILITIES** | | Equipment Sanitizing | 29 A | Packaging materials | 56 A |
| Water potability records | 01 A | Product handling and storage | 30 A | Laboratory confirmation | 57 A |
| Chlorination procedures | 02 A | Product reconditioning | 31 A | Label approvals | 58 A |
| Back siphonage prevention | 03 A | Product transportation | 32 A | Special label claims | 59 A |
| Hand washing facilities | 04 A | **(d) ESTABLISHMENT SANITATION PROGRAM** | | Inspector monitoring | 60 A |
| Sanitizers | 05 A | Effective maintenance program | 33 A | Processing schedules | 61 O |
| Establishments separation | 06 A | Preoperational sanitation | 34 A | Processing equipment | 62 O |
| Pest --no evidence | 07 A | Operational sanitation | 35 A | Processing records | 63 O |
| Pest control program | 08 A | Waste disposal | 36 A | Empty can inspection | 64 O |
| Pest control monitoring | 09 A | **2. DISEASE CONTROL** | | Filling procedures | 65 O |
| Temperature control | 10 A | Animal identification | 37 A | Container closure exam | 66 O |
| Lighting | 11 A | Antemortem inspec. procedures | 38 A | Interim container handling | 67 O |
| Operations work space | 12 A | Antemortem dispositions | 39 A | Post-processing handling | 68 O |
| Inspector work space | 13 A | Humane Slaughter | 40 A | Incubation procedures | 69 O |
| Ventilation | 14 A | Postmortem inspec. procedures | 41 A | Process. defect actions -- plant | 70 O |
| Facilities approval | 15 A | Postmortem dispositions | 42 A | Processing control -- inspection | 71 O |
| Equipment approval | 16 A | Condemned product control | 43 A | **5. COMPLIANCE/ECON. FRAUD CONTROL** | |
| **(b) CONDITION OF FACILITIES EQUIPMENT** | | Restricted product control | 44 A | Export product identification | 72 A |
| Over-product ceilings | 17 M | 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 N |
| Outside premises | 24 A | **4. PROCESSED PRODUCT CONTROL** | | "Equal to" status | 80 N |
| **(c) PRODUCT PROTECTION & HANDLING** | | Pre-boning trim | 51 U | Imports | 81 N |
| Personal dress and habits | 25 A | Boneless meat reinspection | 52 A | | |
| Personal hygiene practices | 26 A | Ingredients identification | 53 A | | |
| Sanitary dressing procedures | 27 A | Control of restricted ingredients | 54 A | | |

| FOREIGN PLANT REVIEW FORM (reverse) | REVIEW DATE | ESTABLISHMENT NO. AND NAME | CITY |
|---|---|---|---|
| | 20 October 2000 | Castricum Brothers Propriety LTD 342 Hammond Road Est. 3085 | Dandenong, Vic |
| | | | COUNTRY Australia |

| NAME OF REVIEWER | NAME OF FOREIGN OFFICIAL | EVALUATION |
|---|---|---|
| Dr. M. Douglas Parks | Dr. Peter McGregor, Senior ATM | [X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable |

COMMENTS:

SSOP--Very little preventative action being recorded.

HACCP--Validation plan did not include the calibration of the thermometer.

E coli testing--Carcass selection was not random.

Salmonella testing--Carcass selection was not random.

28,51-- Feces found on a carcass after pre-bone trim and on a shank in-box ready to be closed for shipment.

17--Heavily beaded condensate was on the ceiling above exposed carcasses in a cooler.

28--Urine spillage onto sheep carcasses was not being monitored in the slaughter department.

Attachment G

Department of
AGRICULTURE
FISHERIES &
FORESTRY -
AUSTRALIA

AQIS
AUSTRALIAN QUARANTINE
AND INSPECTION SERVICE

Ms Sally Stratmoen
Chief, Equivalence Section,
International Policy Division,
Office of Policy, Program Development and Evaluation,
Food Safety and Inspection Service
US Department of Agriculture
South Building
Washington, D.C. 20250
5 June 2001

Dear Ms Stratmoen,

Thank you for your letter of 6 April 2001 with a copy of the Draft Final Audit Report of the on-site audit of Australia's meat inspection system conducted between October 16 and November 3, 2000. AQIS appreciates the opportunity to review the audit findings contained in the draft report prior to its finalisation. We are encouraged by the generally favourable findings and particularly the positive conclusions concerning AQIS's system of inspection controls for Australian meat plants exporting to the United States.

We confirm the draft report is an accurate reflection of findings at the audit. The report identifies some matters on which we would like to provide an update to that contained in the report:

## Use of Rodent Bait Stations inside production related areas.

AQIS acknowledges the concerns of the reviewers about the use of rodent bait stations inside meat processing plants. It had been AQIS general policy that rodent bait stations should not be used in production areas involving exposed product. However, soon after the audit AQIS instituted a consistent policy that required bait stations only to be used at external locations on export registered plants.

To complement this immediate action, AQIS subsequently circulated AQIS Meat Notice 2001/03 titled Pest and Vermin Control Procedures (Attachment 1). This document provides comprehensive guidelines for the development and application of the pest and vermin control standard operating procedure as well as elaborating on the responsibilities of management and AQIS to have appropriate monitoring and verification systems in place.

## Update on urine spillage on carcases in sheep slaughter establishments using inverted dressing systems

1901-2001
Centenary of Federation

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Following the audit AQIS addressed this issue with industry and AQIS field staff. Subsequent AQIS audits at sheep slaughter establishments utilising inverted dressing systems have focused on preventive measures aimed at reducing urine spillage as well as on corrective action applied to contaminated carcases.

To complement this immediate action, AQIS subsequently circulated AQIS Meat Notice 2001/04 titled Zero Tolerance for Faeces, Ingesta, Urine and Milk (Attachment 2). This document reinforces the fact that AQIS requires that urine be treated as a carcase contaminant for which there is a zero tolerance. It also reinforces the requirement that work instructions developed for line operators, company supervisors and QA staff must emphasise the necessity for immediate corrective action on contaminated product and effective preventive action applied to future production.

## Update on need for improvement in dressing systems.

An AQIS/ industry working party has revised the industry monitoring tool known as Meat Hygiene Assessment, which focuses on objective monitoring of process and product.

The revised version is in its final draft and is a comprehensive document which places increased emphasis on process control. Process control monitoring measures compliance with documented work instructions for line operators and performance is reflected as a conformance index.

The AQIS role in Meat Hygiene Assessment is one of verification using check the checker activities as well as independent product examination.

## Update on generic E. coli testing

At the time of the audit, industry and AQIS staff were circulated to ensure that carcase selection was random and used a separate random sampling regime to that used to select carcases for Salmonella testing. Programs were also revised to ensure the location of E. coli testing within the establishment was clear.

## Update on establishment 533 (T & R Pastoral)

This establishment was delisted following the audit largely due to deficiencies relating to product contamination and inappropriate procedures.

Following a period of sustained operational compliance involving the presence of extra AQIS staff, and an acceptable finding at an audit earlier

out by a senior AQIS Area Technical Manager, this establishment was relisted for export to US as of start of business on 1 December 2000

This establishment continues to operate at an acceptable standard.

## Update on specific issues at 8 other establishments audited

AQIS Area Technical Managers responsible for these establishments have confirmed that specific establishment issues identified during the audit have been satisfactorily addressed.

I trust the information provided in this response is helpful to FSIS in finalisation of the audit report of the Australian export meat inspection system at US listed plants. If there are any additional questions or points of clarification that FSIS would like in relation to the information provided, we would be happy to address them.

We look forward to receiving the final audit report and a confirmation of the continuing equivalence of the Australian meat inspection program with the domestic program in the US.

Yours sincerely,

for

Steve Bailey
General Manager
Food Inspection Operations
Inspection and Export Services

/att.

Attachment 1. AQIS Meat Notice 2001/03 titled Pest and Vermin Control Procedures

Attachment 2. AQIS Meat Notice 2001/04 titled Zero Tolerance for Faeces, Ingesta, Urine and Milk

Department of
AGRICULTURE
FISHERIES &
FORESTRY -
AUSTRALIA

# AQIS NOTICE

| AQIS Notice Number | Pest and Vermin Control Procedures |
|---|---|
| MEAT 2001 / 03 | |
| NSFS Ref 7 | |
| Date of Effect: 14 May 2001. / Date of Expiry: Until further notice | Contact Officer: Charles Bosgra, Area Technical Manager, Melbourne Vic 8006, Telephone: 03 9246 6711, Facsimile: 03 9246 6875 |

| Distribution Category | Last Notice this Category | Distribution Category | Last Notice this Category |
|---|---|---|---|
| ☑ Central & Regional Office | | ☑ Managers, Export Meat Establishments | |
| ☑ OIC Inspection Staff Meat Establishments | | ☐ Licensed Meat Exporters | |
| ☑ Meat Inspection Staff | | ☐ Managers, Export Slaughtering Establishments | |

**IMPLEMENTATION SCHEDULE** (to be completed by the On Plant Supervisor on the AQIS file copy)

Date Received: _____ Date Discussed with Management: _____

Initial Implementation Date: _____ Date Completed: _____

Initials: _____ Date checklist sent to ATM: _____

AQIS
AUSTRALIAN QUARANTINE AND INSPECTION SERVICE

## Purpose

To provide both Industry and AQIS field staff a comprehensive update of the guidelines for pest and vermin control procedures.

## Scope

This notice applies to all export meat establishments registered under the Export Meat Orders and the Game, Poultry and Rabbit Meat Orders.

## Background

This notice provides guidelines for the development and application of the pest and vermin standard operating procedures required at export meat establishments. The notice elaborates on the responsibilities of management and AQIS to have monitoring and verification systems which accurately record the control measures used at the establishment.

The notice further addresses the appropriate use of chemicals and other measures for pest and vermin control within the establishment. The document incorporates comments by recent overseas reviewers.

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**Procedures**

Attached to this notice are three documents

| | |
|---|---|
| **Attachment 1** | A comprehensive guide to a Standard Operating Procedure for Pest and Vermin Control for company personnel. |
| **Attachment 2** | A Work Procedure for AQIS employees. |
| **Attachment 3** | A checklist to be completed by the AQIS OPS before the 14 July 2001 and forwarded to the ATM responsible for the establishment. |

**Actions**

1. The establishment current approved pest and vermin control SOP should be enhanced in line with the program documented in Attachment 1 within 2 months of the date of effect of this notice;
2. The revised SOP is to be submitted to the OPS who will recommend any changes and sign the SOP off when the OPS is satisfied with the SOP addresses issues identified in the guideline, and
3. OPS will submit the SOP to the ATM for approval.

Brian Macdonald
Executive Manager
Meat Inspection and Food Services Group

Attachment 1, 2 and 3

Department of AGRICULTURE FISHERIES & FORESTRY - AUSTRALIA

# AQIS NOTICE

| AQIS Notice Number | ZERO TOLERANCE FOR FAE INGESTA, URINE, AND MI |
|---|---|
| MEAT 2001 / 04 | |
| NSFS Ref 17 | |
| Date of Effect: 14 May 2001. / Date of Expiry: Until further notice | Contact Officer: Stephen Tidswell, Technical Services Branch, Telephone: 02 62724597, Facsimile: 02 62725442 |

| Distribution Category | Last Notice this Category | Distribution Category | Last Notice this Category |
|---|---|---|---|
| ☑ Central & Regional Office | | ☑ Managers, Export Meat Establishments | |
| ☑ OIC Inspection Staff Meat Establishments | | ☐ Licensed Meat Exporters | |
| ☑ Meat Inspection Staff | | ☐ Managers, Export Slaughtering Establishments | |

**IMPLEMENTATION SCHEDULE** (to be completed by the On Plant Supervisor on the AQIS in-

Date Received: _____ Date Discussed with Management: _____

Initial Implementation Date: _____ Date Completed: _____

Initials: _____ Date checklist sent to ATM: _____

AQIS
AUSTRALIAN QUARANTINE AND INSPECTION SERVICE

## PURPOSE

*[1] To restate and reinforce the requirements for zero tolerance for a rar carcase contaminants, specifically faeces, ingesta, urine, and milk;*

*[2] To re-emphasise that urine and milk are included as a carcase contam which there is a zero tolerance.*

*[3] To be read in conjunction with relevant AQIS Meat Notices identified in the s*

*[4] To clarify the requirement for Corrective and Preventative Action.*

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## SCOPE

This AQIS Meat Notice applies to all export registered establishments involved slaughter, boning and/or processing of meat.

## BACKGROUND

AQIS has required a zero tolerance for ingesta, faeces, milk and urine since AQ notice 94/4.

- In July 1996 the USDA published a Final Rule which mandated the introduction of HACCP plans and sanitation standard operating procedures (SSOPs) in all establishments that supply to the US market. Zero tolerance for visible contamination of the carcase by ingesta, milk and faeces was an important part of the Final Rule. US reviewers, and actions taken by US port-of-entry inspectors, have emphasised the importance the US places on zero tolerance defects.

- AQIS Meat Notice 96/38 required that HACCP based quality assurance systems were mandatory for all export registered establishments and as part of this notice it was therefore mandatory for company's to develop Standard Operating Procedures and Work Instructions.

- AQIS Meat Notice 96/37 introduced Meat Hygiene Assessment (MHA) as a consistent and objective technique for improving meat hygiene standards.

- AQIS Meat Notice 97/17 extended MHA from slaughterfloor monitoring, to boning room operations, and chiller/freezer/storage/loadout. This notice made the point that detection of a zero tolerance defect on carcases selected for monitoring after the pre-boning trim, automatically rates this operation as unacceptable and triggers corrective action in the form of increased monitoring and adjustment of the operation, regardless of the overall conformity index for the boning process.

- Inspection for zero tolerance defects in boneless meat is the subject of EMO 285. If a zero tolerance defect is discovered, re-inspection and disposition of meat in that inspection lot is as described in EMO 286. The provisions of EMO 285 and 286 are picked up in Meat Hygiene Assessment, as carton meat assessment (CMA). Detection of zero tolerance defects at CMA requires reinspection of product lots, based on EMO 286.

- AQIS Meat Notice 98/3 was issued to address the problem of zero tolerance defects in cattle caused by ingesta. It requires occlusion of the oesophagus prior to hoisting, to prevent contamination of the carcase and head by ingesta.

## DEFINITIONS

*Zero tolerance* is the requirement for no (zero) level of macro-contamination by faeces, ingesta, urine and milk. If the contamination is identifiable as faeces, ingesta, urine or milk then it will be considered a zero tolerance defect. Contamination not clearly identifiable as a zero tolerance defect is not to be scored as a zero tolerance defect.

*Macro-contamination* is any contamination that is visible/obvious to the observer. It includes smears or specks. Contamination can originate from any source on the animal, such as the gastro-intestinal tract, wool or hide.

## COMPANY RESPONSIBILITIES

The company's responsibility is to ensure that they have an effective system in place that will ensure a zero limit is maintained for faeces, ingesta, milk and urine.

1. The developing of work instructions by companies for supervisors, line operators and QA staff will underpin the effectiveness of the system to control zero tolerance defects. These Work Instructions should outline how the employee will handle zero tolerance defects detected at the work station, during process monitoring, at trim stations and at final product checks for the slaughterfloor, offal room, boning room, bagging stations etc.

   Work instructions should emphasise that when a zero tolerance defect is detected, there must be
   - immediate corrective action; and
   - effective preventive action.

   Both corrective and preventive actions should be documented in company monitoring and verification records. These records are assessed by internal and external audit and provide the basis for verifying the company's control over the operating system.

2. Corrective action must focus on

a) Actual product affected by a ZT defect.
   In most cases trimming of the affected product is an acceptable corrective action. There are two trimming options for dealing with the product immediately affected:
   [1] Trim the carcase on the spot, or
   [2] Tag the carcase for later trimming and ensure the identification of the potentially contaminated area at time of tagging.

b) Product already produced from the time of the last clear check as required under MHA.

3. Preventive action must focus on ensuring that future product produced is free of zero tolerance defects. The area supervisors and the line operators are accountable for ensuring preventative action is effective and their work instructions should reflect this accountability.

4. Verification that the system for controlling, reducing or eliminating zero tolerance defects is under control should be documented.

## AQIS RESPONSIBILITIES

AQIS staff shall ensure that:

1. all zero tolerance macro-contaminants (ingesta, faeces, urine, milk) are correctly dealt with;
2. the monitoring, corrective and preventive action procedures with respect to zero tolerance in the MHA manual are followed and documentation under the NPMS reflect this is occurring.

## POINTS TO NOTE:

a) The FSIS Review highlighted the fact that urine contamination is a problem. This is particularly so with inverted dressing systems for sheep and goats and is particularly difficult to prevent in ewes. In males, urethra clips applied to the penis are commonly used as a routine, and are reliable if applied early. If applied on an 'as needs basis' after urine leakage has been detected they are not effective and there may still be urine contamination of the carcase, which requires an extensive urine trim.

b) Urine and milk contamination may be difficult to identify on the processing chain, but in both cases the contamination must be dealt with immediately by trimming or tagging with identification of the potentially contaminated area for trimming later.

- It cannot be assumed urine and milk are sterile, or only infected with non-pathogenic organisms, and as a result are low risk ZTs. (N.B: It is not uncommon to have sub-clinical infections of both the udder and lower urinary tract, including the bladder, with organisms that can be potential food poisoning organisms eg: Bacillus cereus in the udder and E.coli in the lower urinary tract.)
  - Where there has been urine contamination and this has been identified with a tag an extensive urine trim shall be undertaken, as the extent of urine contamination cannot be easily determined. The extent of the area to be trimmed will vary with the type of dressing system. It is best if the urine trim procedure is developed, agreed by both the company and OPS and then documented.

c) Although bile is not specifically defined as a zero tolerance defect, it is an inedible contaminant. Bile spillage should be subject to effective trimming.

d) As part of the corrective action, the assessment and treatment of affected product, already produced from the time of the last clear check as required under the MHA, must be documented to substantiate any disposition made on the product.

e) Whatever method of verification that a company chooses to use, indications are that the FSIS Reviewer will assess effectiveness of the MHA or the HACCP plan for controlling zero tolerance defects on the slaughterfloor, at the point immediately after the final trim.

**FURTHER INFORMATION**

AQIS Meat Notice 94/4.
AQIS Meat Notice 96/37.
AQIS Meat Notice 96/38.
MHA manual distributed with AQIS Meat Notice 97/5.
AQIS Meat Notice 97/17.
AQIS Meat Notice 98/3.
Export Meat Order 285
Export meat Order 286

Brian Macdonald
Executive Manager
Meat Inspection and Food Services Group