



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

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Dr. Tony Zohrab  
Director, Animal Products Group  
New Zealand Food Safety Authority (NZFSA)  
South Tower, 86 Jervois Quay  
PO Box 2835  
Wellington, New Zealand

Dear Dr. Zohrab:

This letter transmits the Food Safety and Inspection Service's final report of a meat inspection system audit conducted in New Zealand from September 2 through October 8, 2004. A copy of this report is enclosed for your records.

If you have any questions regarding the audit or need additional information, please contact me by telephone at 202-720-3781, by fax at 202-690-4040, or by e-mail at [sally.white@fsis.usda.gov](mailto:sally.white@fsis.usda.gov).

Sincerely,

Sally White, Director  
International Equivalence Staff  
Office of International Affairs

Enclosure

cc:

David Rosenbloom, Counselor, US Embassy, Wellington  
Jason Frost, Technical Coordinator Veterinary Services, Embassy of New Zealand  
Barbara Masters, Acting Administrator, FSIS  
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Country File

**FINAL**

FEB 14 2005

FINAL REPORT OF AN AUDIT CARRIED OUT IN NEW  
ZEALAND COVERING NEW ZEALAND'S MEAT  
INSPECTION SYSTEM

SEPTEMBER 2 THROUGH OCTOBER 8, 2004

Food Safety and Inspection Service  
United States Department of Agriculture

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## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

ATM	Agency Technical Manager
CCA	Central Competent Authority, the New Zealand Food Safety Authority (NZFSA)
CIG	Compliance and Investigation Group
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/ Hazard Analysis and Critical Control Point Systems
MAF	Ministry of Agriculture and Forestry
NZFSA	New Zealand Food Safety Authority
TL	(NZFSA-VA) Team Leader
VA	Verification Authority
SSOP	Sanitation Standard Operating Procedures
<i>Salmonella</i>	<i>Salmonella</i> species
TTS	Traveling Technical Supervisor
VTS	Veterinary Technical Supervisor

## 1. INTRODUCTION

The audit took place in New Zealand from September 2 through October 8, 2004.

An opening meeting was held on September 2, 2004, in Wellington with the Central Competent Authority (CCA). At this meeting, the auditors confirmed the objective and scope of the audit, the audit itineraries, and requested additional information needed to complete the audit of New Zealand's meat inspection system.

The auditors were accompanied during the entire audit by representatives from the CCA, the New Zealand Food Safety Authority (NZFSA), and representatives from the regional and local inspection offices.

## 2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the audit team, which included two International Audit Staff Officers, the International Audit Staff Branch Chief, and a chemist from the Office of Public Health Science visited the following sites: the headquarters of the CCA, six regional inspection offices, four laboratories performing analytical testing on United States-destined product, eight slaughter and processing establishments, and five meat processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	1	Wellington
	Regional	6	Wanganui, Hamilton, Tauranga, Gisborne, Blenheim, and Christchurch
Laboratories		4	
Meat Slaughter Establishments		8	
Meat Processing Establishments		5	

## 3. PROTOCOL

The official on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in New Zealand's inspection headquarters and regional offices. The third part involved on-site visits to 13 establishments (eight slaughter establishments and five processing establishments). The fourth part involved visits to three private laboratories one government laboratory. The publicly-owned and -operated Gribbles Analytical Laboratories in Hastings were

conducting analyses of field samples for the presence of *Salmonella* species. The privately-owned and -operated EnviroLink Laboratory, Ltd. in Christchurch was conducting analyses of samples for the presence of generic *Escherichia coli* (*E. coli*). Finally, the government-owned and -operated AgriQuality New Zealand, Ltd. laboratory in Lower Hutt and the privately owned-and -operated Hill Laboratory, Ltd. in Hamilton were conducting analyses of field samples for New Zealand's national residue control program.

Program effectiveness determinations of New Zealand's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP), (2) animal disease controls, (3) slaughter/ processing controls, including the implementation and operation of Hazard Analysis/Critical Control Point (HACCP) programs and the testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including the testing program for *Salmonella* species. New Zealand's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditors evaluated the nature, extent and degree to which findings impacted on food safety and public health. The auditors also assessed how inspection services are carried out by New Zealand and also determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

During the opening meeting, the lead auditor explained that New Zealand's inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for New Zealand. FSIS requirements include daily inspection in all certified establishments, humane handling and slaughter of animals, the handling and disposal of inedible and condemned materials, species verification testing, and FSIS' requirements for HACCP, SSOP, testing for generic *E. coli* and *Salmonella* species.

Equivalence determinations are those that have been made by FSIS for New Zealand under provisions of the Sanitary/Phytosanitary Agreement.

Currently, FSIS has determined that five alternate procedures are equivalent to FSIS requirements, regarding alternate testing measures for generic *E. coli*, alternate testing measures for *Salmonella* species, alternate post-mortem inspection procedures for adult bovines, alternate post-mortem inspection procedures for 5- to 10-day-old "bobby" calves, and permission to slaughter, dress, and/or process equines in an establishment in which other species are also slaughtered, dressed, and/or processed.

#### 4. LEGAL BASIS FOR THE AUDIT

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

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

- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations, and
- The Poultry Products Inspection Act (21 U.S.C. 451 et seq.) and the Poultry Products Inspection Regulations (9 CFR Part 381]

## 5. SUMMARY OF PREVIOUS AUDITS

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

The last FSIS audit of New Zealand's inspection system was conducted in June-July 2003. The following deficiencies were identified:

- In one establishment, maintenance and cleaning of over-product structures and equipment in several production and other exposed-product areas had been neglected to varying degrees.
- In one establishment, housekeeping was found to be poor in a number of edible product support areas.
- Maintenance and cleaning of hand-operated rail gates had been neglected in one establishment.
- A deteriorated and frayed conveyor belt was in use in one establishment.
- Condensation was found on rails over exposed beef quarters in one establishment.
- In two other establishments, lesser degrees of neglected maintenance and cleaning of over-product equipment were identified, and in two establishments, housekeeping was found to be poor in edible product support areas.
- In two establishments, fecal contamination was identified on lamb carcasses that had passed the pre-cutting trim station.
- In one establishment, pre-boning trimmers were not using hand soap after trimming beef quarters which had been potentially contaminated with condensation.
- In one establishment, several members of the audit team, being guided by an establishment official, did not wash their hands as required upon entering carcass coolers at the start of the day's audit.
- In one establishment, light was inadequate at inspection stations.
- In two establishments, there were instances of inadequate separation of clean and street clothes.

- In all nine of the certified slaughter establishments audited, written corrective actions to be taken, in the event that critical limits are exceeded, did not include re-inspection of the product back to the last acceptable monitoring check.
- In one establishment, no consideration of product disposition, in the event that the critical limit (of zero visible contamination with feces or ingesta) was exceeded, was included in the written HACCP plan.
- In one establishment, there were several illegible corrections in one of the documents for the monitoring of critical limits.
- In one establishment, the Pre-Shipment Document Review form did not include an adequate description of the amount of product covered by the review.

## 6. MAIN FINDINGS

### 6.1 Government Oversight

#### 6.1.1 CCA Control Systems

Oversight of the New Zealand meat inspection system is provided by the Ministry of Agriculture and Forestry (MAF) and the Minister of State Owned Enterprises (MSOE). MAF oversight is provided by the New Zealand Food Safety Authority (NZFSA) through the Compliance and Investigation Group (CIG), the Animal Products Group (APG), and the Operations Group (OG). The Verification Authority (VA) is part of OG and the Director of APG is the FSIS contact or chief veterinary officer for New Zealand's meat inspection system. MSOE provides oversight through ASURE New Zealand. The various responsibilities of these organizations are outlined in a Memorandum of Understanding dated June 2003, stating that MAF/NZFSA/APG sets the standards, applies sanctions, and provides the statutory authorization to VA and ASURE. NZFSA/CIG audits the performance of VA, ASURE, and industry. NZFSA Verification Authority implements the standards, verifies that they are met, and certifies product as such. ASURE inspects livestock and product and performs associated tasks such as slaughter brand control and product sampling.

Both VA and ASURE have divided their field staff according to the location, number, and complexity of the establishment. VA is divided into nine regions, each managed by a Team Leader who maintains technical competence (the Team Leader position in Auckland was vacant at the time of this audit; the responsibilities assigned to the vacant Team Leader's position in the Auckland region were being shared by the Team Leaders in Hamilton and Tauranga).

ASURE managers are located in numerous offices around the country as needed to provide oversight for the ASURE staff in the establishments.

## 6.1.2 Ultimate Control and Supervision

Overall, New Zealand delivers and maintains a unique meat inspection system. NZFSA/VA maintains a physical presence in all establishments where ASURE inspectors are assigned. ASURE inspectors perform ante- and post-mortem inspection and related activities. VA is designed to verify that ASURE employees are effectively delivering their mandatory functions and that establishments are in compliance with all New Zealand and FSIS requirements.

New technical information is distributed to all meat inspection employees via Overseas Market Access Requirements (OMARs), General Export Requirements (GREX), and Technical Directives (TDs). OMAR and GREX documents are based on the Animal Products Act of 1999 and TDs are based on the Meat Act of 1981.

Information on new and updated requirements is sent from NZFSA headquarters directly to all NZFSA field personnel, ASURE managers, and establishment management officials via e-mail. The Agency Technical Manager (ATM) conducts a weekly teleconference that is attended by all NZFSA Team Leaders (TL). The Veterinary Technical Supervisors (VTS) and Traveling Technical Supervisors (TTS) in remote locations provide monthly reports to the TL specifying the compliance synopses of the plants and also synopses of the technical information they have received during the month, as well as what they have done to ensure establishment compliance. For less remote locations, there are weekly circuit meetings in which all current issues are discussed and correlated; either the TL or the TL's Unit Coordinator attends these meetings. Each TL provides a (monthly) Approved Signatory Report to the ATM; this report includes the minutes from these meetings, the monthly synopses, certification issues, complaints and appeals, ASURE issues, VA procedural issues, compliance issues, and recommendations regarding technical specifications.

The TL appraises the performances of each supervising veterinarian annually. The TL and the supervising veterinarian together evaluate the performances of each VTS and each TTS, also annually.

ASURE serves the meat inspection program in a unique environment. On the one hand, ASURE is obliged to make a profit as an SOE; however, on the other hand, ASURE is not allowed to make a profit from the costs imposed on industry for meat inspection. ASURE is, therefore, commercially driven to provide "Added Value" work that ASURE performs for industry on a fee basis. However, only 2-3 percent of ASURE's income comes from fee work. Fees are standardized, payments are made directly to ASURE headquarters, and the employees are always accountable to ASURE.

In order to perform fee work, an ASURE employee temporarily turns in ("surrenders") his/her authorization to inspect (Warrant), performs the work, and retrieves the Warrant before performing mandatory inspection work. Occasionally, an employee will perform long-term fee work or work on a trial basis before actually leaving ASURE. However, ASURE is required to implement measures to identify and manage potential areas of conflict of interest in order to meet the relevant standards of NZFSA.

FSIS is reviewing the efficacy of NZFSA-VA's ultimate control and supervision over official activities of all government and ASURE employees in certified establishments.

### 6.1.3 Assignment of Competent, Qualified Inspectors

The process of maintaining competency and compliance is approached differently by NZFSA, VA, and ASURE. NZFSA performs CIG audits, on a periodic basis, that cover VA, ASURE, and industry activities and compliance. VA performs Technical Reviews of establishment compliance and inspection activities and conducts Performance Based Verification (PBV) audits and Bulk Audits of each Establishment and of the ASURE presence within that establishment. VA also performs frequent Regulatory Overviews at each establishment. ASURE performs Statistical Process Control System (SPCS) Checks on the various aspects (22 Systems) of inspection that they monitor or perform. SPCS Checks include Procedures Checks and Decision Checks.

The VA Technical Reviews, in combination with CIG Audits, comply with the monthly supervisory visits required by FSIS. Team Leaders and Unit Coordinators perform this function for VA and maintain their competency via the Quality Assurance Assessor, who is supervised by the VA Technical Manager.

The Director General, through the Director, Animal Products, negotiates a basic formula for ASURE staffing, which is subject to some modification according to individual requirements. The staffing of post-mortem positions in a slaughter establishment is negotiated between ASURE and establishment management; the NZFSA-VA VTS has the authority to order a decrease in line speed if he/she finds it necessary for the post-mortem inspectors to perform their duties adequately. If the VTS is not confident that the staffing is adequate, he/she informs the TL, who will confer with his/her counterpart (Regional Manager) in ASURE to resolve the issue. If the issue cannot be resolved at this level, it will be elevated to involve, the ATM, the Director of Animal Products, and the CEO for ASURE in Wellington.

### 6.1.4 Authority and Responsibility to Enforce the Laws

Accountability for administrative and technical activities also varies between VA and ASURE. For example, the VA Technical Manager is technically accountable to the Director of the Animal Products Group, NZFSA, who is also the contact person for FSIS. However, this manager is administratively accountable to and supervised by the General Manager for VA. Fortunately, the Agency Technical Manager is the supervisor of the Team Leaders, who manage the field inspection staff. In contrast, the ASURE Technical

Manager does not directly supervise the field inspection staff, and most of the Area/Site Managers who do have supervisory responsibilities, do not maintain their technical competence in meat inspection.

#### 6.1.5 Adequate Administrative and Technical Support

NZFSA/VA has the ability to support a third party audit.

#### 6.2 Headquarters Audits

The auditors conducted a review of inspection system documents at the headquarters of the inspection service and in one regional office. 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,
- Course content for the education and training of new veterinary inspection personnel,
- 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,
- 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, and
- Enforcement records, including examples of criminal prosecution, seizure and control of noncompliant product, and delisting an establishment that is certified to export product to the United States.

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

#### 6.3.1 Audits of Regional Inspection Offices

In the course of the routine audit, the auditors interviewed six regional NZFSA-VA Team Leaders in their offices in Wanganui, Hamilton, Tauranga, Gisborne, Blenheim, and Christchurch, in order to discuss delivery of oversight and to review documents regarding internal review reports and other supervisory visits to establishments that were certified to export to the U.S., training records for NZFSA officials, and export certificates. No concerns arose as a result of these interviews.

### 7. ESTABLISHMENT AUDITS

The FSIS auditors visited a total of 13 establishments—eight slaughter/processing establishments and five processing establishments. None were delisted by New Zealand because of failure to meet basic U.S. requirements, and none received a “Notice of Intent to Delist” because of HACCP- or SSOP-implementation deficiencies.

## 8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

Residue laboratory audits focus on sample handling, sampling frequency, timely analysis data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test United States samples, the auditors evaluate compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements.

The following laboratories were audited:

- The government-owned and -operated AgriQuality New Zealand, Ltd. laboratory in Lower Hutt,
- The privately-owned and -operated Hill Laboratory, Ltd. in Hamilton,
- The publicly-owned and -operated Gribbles Analytical Laboratories in Hastings, and
- The privately-owned and -operated EnviroLink Laboratory, Ltd. in Christchurch.

The findings in these laboratories will be discussed in Section 11.3 (Testing for generic *E. coli*), 12 (RESIDUE CONTROLS), and 13.2 (Testing for *Salmonella* species) of this report.

## 9. SANITATION CONTROLS

As stated earlier, the FSIS auditors focus on five areas of risk to assess New Zealand's meat inspection system. The first of these risk areas that the FSIS auditors reviewed was Sanitation Controls.

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

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

#### 9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The SSOP in the 13 establishments were found to meet the FSIS regulatory requirements.

#### 9.2 OTHER SANITATION CONCERNS

No further sanitation deficiencies were noted.

### 10. ANIMAL DISEASE CONTROLS

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

Furthermore, bovine and bobby calf slaughter were performed in accordance with the alternate procedures determined to be equivalent by FSIS.

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

### 11. SLAUGHTER/PROCESSING CONTROLS

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

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

#### 11.1 Humane Handling and Humane Slaughter

No deficiencies were noted.

## 11.2 HACCP Implementation

All establishments approved to export meat products to the United States are required to have developed and adequately implemented HACCP programs. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The NZFSA authorities have conducted a national, industry-wide review of the HACCP programs in all establishments certified as eligible to export to the U.S. to re-evaluate the appropriateness of the Critical Control Points and their Critical Limits since the last FSIS audit of New Zealand's meat inspection system.

The HACCP programs were reviewed during the on-site audits of the 13 establishments. All establishments had adequately implemented the PR/HACCP requirements.

## 11.3 Testing for Generic *E. coli*

New Zealand has adopted the FSIS regulatory requirements for testing for generic *E. coli* with the exception of the following equivalent measures, which have been determined to be equivalent by FSIS:

- The testing frequency in lambs and sheep is five carcasses per week; this alternate frequency was written into the HACCP plans as required in all the slaughter establishments visited during this audit.
- New Zealand samples cattle at three sites: flank, brisket, and outside hind-leg.
- New Zealand samples bobby calves at three sites: flank, foreleg, and fore-rump.
- New Zealand uses a swab sampling tool.

Seven of the 13 establishments audited were required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* (one establishment slaughters only deer and raptites) and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in all of the eight slaughter establishments in which it was required.

The privately-owned and operated EnviroLink Laboratory, Ltd. in Christchurch, in which field samples of U.S.-eligible product are analyzed for generic *E. coli*, was audited. No deficiencies were noted.

## 11.4 Testing for *Listeria monocytogenes*

None of the establishments audited were producing any ready-to-eat products, either for the U.S. or for any other domestic or foreign markets, so the requirements for testing for *Listeria monocytogenes* according to the Final Rule of June 6, 2003, did not apply to these establishments.

## 12. RESIDUE CONTROLS

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

The Hill Laboratory, Ltd. in Hamilton was audited. The following concerns resulted from this audit:

- There was insufficient documentation that the procedures for servicing and system suitability/verification, as recommended by the manufacturers, were being routinely performed.
- The training program for new analysts was not clearly outlined; detailed requirements for the attainment of proficiency (e.g. bench-training, number of analyses required to be performed correctly) were not evident.
- Control charts containing QC spikes and blind spiked recoveries were not plotted for the results of pesticide analyses.
- Several illegible corrections were found in the official documentation.

The government-owned and -operated AgriQuality New Zealand, Ltd. laboratory in Lower Hutt was audited. One concern resulted from this audit:

- The acceptability criteria for the monthly check samples were not consistent with those used for the daily positive-control spiked samples.

In addition, the following observation was made: Several screening tests are routinely used on urine for analysis of field samples for hormones and antibiotics, whereas the FSIS labs perform the initial analyses using tissue matrices of liver/muscle/ kidney/fat (as appropriate).

## 13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditors reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella*.

### 13.1 Daily Inspection in Establishments

Documented daily inspection was provided in all 13 of the establishments audited for production days on which U.S.-eligible product was produced.

## 13.2 Testing for *Salmonella* Species

New Zealand<sup>7</sup> has adopted the FSIS regulatory requirements for testing for *Salmonella* with the exception of the following equivalent measures, which have been determined to be equivalent by FSIS:

- Establishments take samples.
- Private laboratories analyze samples.
- A swab sampling tool is used.
- Samples are taken at the end of the slaughter or production process and prior to the carcass being cut and/or packaged.

Seven of the 13 establishments audited were required to meet the basic FSIS regulatory requirements for testing for *Salmonella* species (one establishment slaughters only deer and ratites) and were evaluated according to the criteria employed in the United States<sup>7</sup> domestic inspection program.

Testing for *Salmonella* species was properly conducted in all of the seven establishments in which it was required.

The publicly-owned and -operated Gribbles Analytical Laboratories in Hastings, in which field samples of U.S.-eligible product are analyzed for *Salmonella* species, was audited. No deficiencies were noted.

## 13.3 Species Verification

At the time of this audit, New Zealand was required to test product for species verification. Species verification was being conducted in those establishments in which it was required.

## 13.4 Monthly Reviews

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

## 13.5 Inspection System Controls

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

Furthermore, controls were in place for the importation of only eligible meat products from other countries for further processing, security items, shipment security, and products entering the establishments from outside sources.

National mandates for the implementation of compliance with the requirements for special handling of Specified Risk Materials (SRMs) regarding Bovine Spongiform Encephalopathy (BSE) have been implemented as Overseas Market Access Requirements (OMARs). Non-ambulatory cattle are condemned upon ante-mortem inspection, no beef containing SRMs is permitted in U.S.-eligible product, mechanically-separated beef is ineligible for use in U.S.-eligible product, and air-injection stunning is not permitted in New Zealand.

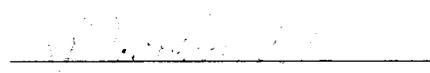
Alternative (screening) procedures, using urine as the matrix, were being employed by one laboratory for the analysis of U.S.-eligible field samples for hormones and antibiotics. These methods have not been submitted to FSIS for equivalence determination. NZFSA should have noted and corrected this in advance of this on-site FSIS audit.

#### 14. CLOSING MEETING

A closing meeting was held on October 8, 2004, in Wellington with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the lead auditor.

The CCA understood and accepted the findings.

Gary D. Bolstad, DVM  
International Audit Staff Officer



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## 15. ATTACHMENTS

Individual Foreign Laboratory Audit Form  
Individual Foreign Establishment Audit Forms  
Foreign country response to Draft Final Audit Report

Ministry of Agriculture and Forestry  
 100-04 (REV. 03/05)

Regulation  
 Sect. 3, 2004

Ministry of Agriculture and Forestry  
 AgriQ, c/o New Zealand, Ltd.

*Handwritten initials/signature*

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOVERNMENT New Zealand Food Safety Authority	CITY & COUNTRY Lower Hutt, New Zealand	ADDRESS OF LABORATORY 18 Ball Rd, Gisborne
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NAME OF REVIEWER Ms. Margaret O'Keefe	NAME OF FOREIGN OFFICIAL Dr. Zlgy Bojarski, Assessor, Compliance & Investigation, NSFSA
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PROCEDURE CATEGORY	Residue Code/Name	ITEM #	EVALUATION CODE	das	abc	sul	βag	bmz	ivm	coc	lev			
				SAMPLING PROCEDURES	REVIEW ITEMS									
	Sample Handling	01		A	A	A	A	A	A	A	A			
	Sample Frequency	02		A	A	A	A	A	A	A	A			
	Timely Analysis	03		A	A	A	A	A	A	A	A			
	Compositing Procedure	04		O	O	O	O	O	O	O	O			
	Interpret Comp Data	05		O	O	O	O	O	O	O	O			
	Data Reporting	06		A	A	A	A	A	A	A	A			
ANALYTICAL PROCEDURES														
	Acceptable Method	07		C	C	A	A	A	A	A	A			
	Correct Tissue(s)	08		C	C	A	A	A	A	A	A			
	Equipment Operation	09		A	A	A	A	A	A	A	A			
	Instrument Printouts	10		A	A	A	A	A	A	A	A			
QUALITY ASSURANCE PROCEDURES														
	Minimum Detection Levels	11		A	A	A	A	A	A	A	A			
	Recovery Frequency	12		A	A	A	A	A	A	A	A			
	Percent Recovery	13		C	C	C	C	C	C	C	C			
	Check Sample Frequency	14		A	A	A	A	A	A	A	A			
	All Analyt W/Check Samples	15		A	A	A	A	A	A	A	A			
	Corrective Actions	16		A	A	A	A	A	A	A	A			
	International Check Samples	17		A	A	O	O	O	A	O	A			
REVIEW														
	Corrected Prior Deficiencies	18		O	O	O	O	O	O	O	O			
OTHER REVIEW														
		19												
		20												

Signature of reviewer: *Margaret O'Keefe* Date: *9/3/04*

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE  
9/3/04

NAME OF FOREIGN LABORATORY  
AgriQuality New Zealand Ltd

A-1b

(Comment Sheet)

FOREIGN GOVT AGENCY NZFSA	CITY & COUNTRY Lower Hutt, New Zealand	ADDRESS OF LABORATORY 1-B East Rd., Gracefield, Lower Hutt
NAME OF REVIEWER Ms. Margaret O'Keefe	NAME OF FOREIGN OFFICIAL Dr. Ziggy Bojarski	

RESIDUE	ITEM NO.	COMMENTS
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Abbreviations: des = diethylstilbestrol; abc = antibiotics; sul = sulfonamides;  $\beta$ ag =  $\beta$ -agonists; bmz = benzimidazoles; iver = ivermectin; lev = levamisole

All	13	The acceptability criteria for the monthly check samples were not consistent with those used for the daily positive-control spiked samples.
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(des, abc)	(7-8)	In addition, the following observation was made: Several screening tests are routinely used on urine for analysis of field samples for hormones and antibiotics, whereas the FSIS labs perform the initial analyses using tissue matrices of liver/muscle/ kidney/fat (as appropriate).
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Foreign Laboratory Review  
 Form 1000-4 (1/00)

REVISIONS  
 Sept 6, 2004

NAME OF FOREIGN LABORATORY  
 Laboratory Ltd.

11-500

FOREIGN COUNTRY LABORATORY REVIEW

FUNCTION/GOVT AGENCY: Oversight by New Zealand Food Safety Authority  
 CITY & COUNTRY: Hamilton, New Zealand  
 ADDRESS OF LABORATORY: 10 W/O Street

NAME OF REVIEWER: Mel Margaret O'Keefe  
 NAME OF FOREIGN OFFICIAL: Dr. Ziggy Bojarski, Assessor, Compliance & Investigation, NZFSA

Residue Code/Name		chc	cp	pcb	pyr											
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE	A	A	A	A									
	Sample Handling	01		A	A	A	A									
	Sample Frequency	02		A	A	A	A									
	Timely Analysis	03		A	A	A	A									
	Compositing Procedure	04		O	O	O	O									
	Interpret Comp Data	05		O	O	O	O									
Data Reporting	06	A	A	A	A											
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A										
	Correct Tissue(s)	08	A	A	A	A										
	Equipment Operation	09	C	C	C	C										
	Instrument Printouts	10	A	A	A	A										
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A										
	Recovery Frequency	12	A	A	A	A										
	Percent Recovery	13	A	A	A	A										
	Check Sample Frequency	14	A	A	A	A										
	All Analyst W/Check Samples	15	A	A	A	A										
	Corrective Actions	16	A	A	A	A										
	International Check Samples	17	A	A	A	A										
REVIEW	Corrected Prior Deficiencies	18	O	O	O	O										
OTHER REVIEW		19														
		20														

Signature of reviewer: Margaret O'Keefe

Date: 9/6/04

## FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE  
9/6/04NAME OF FOREIGN LABORATORY  
Hill Laboratory, Ltd.

A-2b

Comment Sheet

FOREIGN GOV'T AGENCY Oversight by NZFSA	CITY & COUNTRY Hamilton, New Zealand	ADDRESS OF LABORATORY 1 Dyer St.
NAME OF REVIEWER Ms. Margaret O'Keefe	NAME OF FOREIGN OFFICIAL Dr. Ziggy Bojarski	

RESIDUE	ITEM NO.	COMMENTS
		Abbreviations: chc = chlorinated hydrocarbons; op = organophosphates; pcb = polychlorinated biphenyls; pyr = synthetic pyrethrins
All	09	There was insufficient documentation that the procedures for servicing and system suitability/verification, as recommended by the manufacturers, were being routinely performed.
	19	The training program for new analysts was not clearly outlined; detailed requirements for the attainment of proficiency (e.g. bench-training, number of analyses required to be performed correctly) were not evident.
All	19	Control charts containing QC spikes and blind spiked recoveries were not plotted for the results of pesticide analyses.
All	19	Several illegible corrections were found in the official documentation.

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Lamb Packers Feilding, Ltd Feilding	2. AUDIT DATE Sept. 3, 2004	3. ESTABLISHMENT NO. DSP-18	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	O
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

B-1b

Est. DSP-18, Lamb Packers Feilding, Ltd; Feilding, New Zealand; September 3, 2004.

NOTE: Only ostrich meat is exported to the U.S. from this establishment. Only deer were being slaughtered and only venison was processed on the day of this audit.

No deficiencies were noted.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

*Garv D. Bolstad, DVM*

*September 3, 2004*

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Canterbury Frozen Meat Co., Ltd. Pareora	2. AUDIT DATE Sep 30, 2004	3. ESTABLISHMENT NO. ME-34	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

B-2b

Est. ME-34, Canterbury Frozen Meat Co., Ltd., Pareora, New Zealand; September 30, 2004.

No operations were being conducted on the day of the audit, due to pre-scheduled, major maintenance and construction activities.

All deficiencies noted during the previous FSIS audit of this establishment, on July 7, 2003 (which resulted in the issuance by NZFSA of a Notice of Intent to Delist), had been fully addressed and corrected.

No new deficiencies were noted.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

*G. Bolstad* September 30, 2004

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Alliance Group, Nelson Plant Nelson	2. AUDIT DATE Sep 21, 2004	3. ESTABLISHMENT NO. ME-40	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Drs. G. Bolstad, N. Memarian		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

B-3b

Est. ME-40 Alliance Group, Nelson Plant; Nelson, New Zealand; September 21, 2004

No deficiencies were noted.

61. NAME OF AUDITOR  
Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

*G. Bolstad, DVM*

*September 21, 2004*

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION AFFCO Moerewa Moerewa	2. AUDIT DATE Sep 9, '04	3. ESTABLISHMENT NO. MF-47	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Garv D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment:

B-4b

Est. ME-47, AFFCO Moerewa; Moerewa, New Zealand; September 9, 2004.

No deficiencies were noted.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

*Garv D. Bolstad* September 9, 2004

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION CMP Kokiri, Ltd. Kokiri (Greymouth)	2. AUDIT DATE Sep 24, 2004	3. ESTABLISHMENT NO. ME-66	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment:

B-5b

Est.ME-66; CNP Kokiri, Ltd., Kokiri (Greymouth), New Zealand: September 24, 2004

No deficiencies were noted.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

*G. Bolstad, DVM* September 24, 2004

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Alliance Sockburn Sockburn	2. AUDIT DATE Sep 28, 2004	3. ESTABLISHMENT NO. ME-69	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

B-6b

Est. ME-69, Alliance Sockburn; Sockburn, New Zealand; September 28, 2004.

All deficiencies noted during the previous FSIS audit of this establishment, on July 4, 2003 (which resulted in the issuance by NZFSA of a Notice of Intent to Delist), had been fully addressed and corrected.

No new deficiencies were noted.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

*G.D. Bolstad, DVM*

*September 28, 2004*

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Richmond Ltd, Te Aroha Te Aroha	2. AUDIT DATE Sep 15, 2004	3. ESTABLISHMENT NO. ME-84	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment:

B-7b

Est. ME-84; Richmond, Ltd. Te Aroha; Te Aroha, New Zealand; September 15, 2004

No deficiencies were noted.

61. NAME OF AUDITOR

Garv D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

*Garv D. Bolstad* September 15, 2004

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Taylor Preston Ltd. Johnsonville (Wellington)	2. AUDIT DATE Oct 4, 2004	3. ESTABLISHMENT NO. NZE-86	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Boistad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

80. Observation of the Establishment

B-8b

Est. ME-86; Taylor Preston Ltd., Johnsonville (Wellington), New Zealand; October 4, 2004

No operations were being conducted on the day of the audit, due to pre-scheduled, major maintenance and construction activities.

No deficiencies were noted.

81. NAME OF AUDITOR

Gary D. Bolstad, DVM

82. AUDITOR SIGNATURE AND DATE

*G. D. Bolstad, DVM*

*October 4, 2004*

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION McCallum Industries, Ltd. Auckland	2. AUDIT DATE Sep. 7, 2004	3. ESTABLISHMENT NO. PH-134	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Boistad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements		Audit Results	Part D - Continued Economic Sampling		Audit Results
7. Written SSOP			33. Scheduled Sample		O
8. Records documenting implementation.			34. Species Testing		O
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue		O
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>			<b>Part E - Other Requirements</b>		
10. Implementation of SSOP's, including monitoring of implementation.			36. Export		
11. Maintenance and evaluation of the effectiveness of SSOP's.			37. Import		
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.			38. Establishment Grounds and Pest Control		
13. Daily records document item 10, 11 and 12 above.			39. Establishment Construction/Maintenance		
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>			40. Light		
14. Developed and implemented a written HACCP plan.			41. Ventilation		
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.			42. Plumbing and Sewage		
16. Records documenting implementation and monitoring of the HACCP plan.			43. Water Supply		
17. The HACCP plan is signed and dated by the responsible establishment individual.			44. Dressing Rooms/Lavatories		
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>			45. Equipment and Utensils		
18. Monitoring of HACCP plan.			46. Sanitary Operations		
19. Verification and validation of HACCP plan.			47. Employee Hygiene		
20. Corrective action written in HACCP plan.			48. Condemned Product Control		
21. Reassessed adequacy of the HACCP plan.			<b>Part F - Inspection Requirements</b>		
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.			49. Government Staffing		
<b>Part C - Economic / Wholesomeness</b>			50. Daily Inspection Coverage		O
23. Labeling - Product Standards			51. Enforcement		
24. Labeling - Net Weights			52. Humane Handling		O
25. General Labeling			53. Animal Identification		O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)			54. Ante Mortem Inspection		O
<b>Part D - Sampling Generic E. coli Testing</b>			55. Post Mortem Inspection		O
27. Written Procedures		O	<b>Part G - Other Regulatory Oversight Requirements</b>		
28. Sample Collection/Analysis		O	56. European Community Directives		O
29. Records		O	57. Monthly Review		
<b>Salmonella Performance Standards - Basic Requirements</b>			58.		
30. Corrective Actions		O	59.		
31. Reassessment		O			
32. Written Assurance		O			

60. Observation of the Establishment

B 2b

Est.PH-134, McCallum Industries, Ltd.; Auckland, New Zealand; September 7, 2004.

No deficiencies were noted.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE

*G.D. Bolstad, DVM*

*September 7, 2004*

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Garrett International Meats, Ltd. Auckland, New Zealand	2. AUDIT DATE Sep. 5, 2004	3. ESTABLISHMENT NO. PH-214	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Boistad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily inspection Coverage	O
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

B-10b

Est. 214; Garrett International Meats, Ltd., Auckland, New Zealand; September 5, 2004.

No deficiencies were noted.

61. NAME OF AUDITOR

Gary D. Bolstad, DVM

62. AUDITOR SIGNATURE AND DATE



September 5, 2004

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dairy Meats Avondale, Ltd. Avondale/Auckland	2. AUDIT DATE Sep 13, 2004	3. ESTABLISHMENT NO. PH-490	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Garv D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements		Part D - Continued Economic Sampling	
	Audit Results		Audit Results
7. Written SSOP		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily inspection Coverage	O
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

B-11b

Est. PH-490; Dairy Meats Avondale, Ltd; Avondale, Auckland, New Zealand; September 13, 2004

No deficiencies were noted.

61. NAME OF AUDITOR

Gary D. Solstad, DVM

62. AUDITOR SIGNATURE AND DATE

*G. D. Solstad, DVM*

*September 13, 2004*

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Pilot Meat Processors Ltd. Christchurch	2. AUDIT DATE Sep 29, 2004	3. ESTABLISHMENT NO. PH-504	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	O
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

80. Observation of the Establishment

B-12b

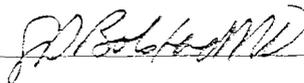
Est. PH-594; Pilot Meat Processors Ltd., Christchurch, New Zealand; September 29, 2004

No deficiencies were noted.

81. NAME OF AUDITOR

Garv D. Bolstad, DVM

82. AUDITOR SIGNATURE AND DATE



September 29, 2004

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Bernard Matthews NZ Ltd Gisborne	2. AUDIT DATE 09.17.2004s	3. ESTABLISHMENT NO. PH-533	4. NAME OF COUNTRY New Zealand
5. NAME OF AUDITOR(S) Dr. Gary D. Bolstad		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

80. Observation of the Establishment

B-13b

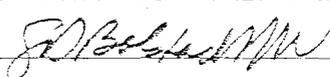
Est. PH-533, Bernard Matthews NZ Ltd, Gisborne, New Zealand; September 17, 2004.

No deficiencies were noted.

81. NAME OF AUDITOR

Gary D. Bolstad, DVM

82. AUDITOR SIGNATURE AND DATE



September 17, 2004



Ref: M-USA000

18 January 2005

Sally White, Esquire  
Director, International Equivalence Staff  
Office of International Affairs  
Food Safety Inspection Service  
Room 2137-South Building  
U.S. Department of Agriculture  
Washington DC, 20250  
UNITED STATES OF AMERICA

Dear Sally

***Response to Final Audit Report***

Thank you for the opportunity of responding to the Draft Final Audit Report for the FSIS Inspection 2 September to 8 October 2004 and your letter that accompanied that report dated 1 December 2004.

Firstly, I would like to express our overall satisfaction at the general conclusions of the audit report and acknowledge them as being a true reflection of the performance of the New Zealand programme.

There is a correction required in the comments under Section 6.1.1. It should be noted that the Verification Agency is no longer part of the MAF Operations Group but now sits under the NZFSA. Under Section 6.1.4 the title is no longer General Manager but Director (Verification Agency).

As regards to Section 12. RESIDUE CONTROLS. We can confirm that a corrective action process has been put into place by the New Zealand Food Safety Authority.

One point NZFSA wants to raise concerns Section 13.5 Inspection Systems and Controls, the last paragraph raises the point that the alternative (screening) procedures, using urine as the matrix for the analysis of field samples for hormones and antibiotics have not been submitted to FSIS for equivalence determination. NZFSA would like to advise that these procedures have been in place for a good number of years and as such underpinned the information provided to FSIS in May 1999. This was the information upon which FSIS determined and advised NZFSA by letter dated 21 June, 2004 that "New Zealand's residue control programme continues to be equivalent to that of the United States".

The methodology used is part of approved European Union requirements which New Zealand is required to perform, is consistent with the performance based methods New Zealand employs in its overall programme, is based upon ISO methodology and as such has international standing.

If FSIS has additional scientific information on the use of such methods we would be only too pleased to receive them for our further consideration.

Should you have any questions with regard to this letter I would be happy to discuss them with you. Please advise me in the first instance by e-mail at [tony.zohrab@nzfsa.govt.nz](mailto:tony.zohrab@nzfsa.govt.nz).

Yours Sincerely



Dr Tony Zohrab  
Director (Animal Products)