



INQUIRY

National Beef (California), Establishment 21488
Export of Ineligible Beef to Japan

August 13, 2008

EXECUTIVE SUMMARY

A shipment from National Beef (California), Establishment 21488, 57 East Shank Road, Brawley California to Japan included one box of bone-in short loins with an end panel label for product code 9781 (Beef Plates Yoshinoya). An inquiry by National Beef concluded the error was caused by a practice that permitted the pre-labeling of boxes prior to packing.

Corrective actions have been taken to prevent the pre-labeling of boxes for export to Japan, in summary as follows:

National Beef (California) has always had an internal procedure that boxes of product destined for export to Japan are checked for miss-packs prior to the box being sealed. As part of this procedure every box that is QA-checked receives a unique stamp on the inside lid of the box. The plant QSA program has been revised to address the root cause of the mispack (pre-labeling of boxes). The QA group will audit each area where packaging is taking place for products destined for Japan. The audit will be conducted once per hour during all production to verify that there are no pre-labeled boxes in any production areas including re-boxing areas. Employee training has been conducted verbally in a class setting with documented sign offs. Verification of training effectiveness is conducted by supervisors physically watching job task performance. Audits of the process will also verify that the training was adequate. Product for export to Japan will be checked in the following ways after boxing: 1) Final verification prior to case sealer, 2) weight range for product code at the final scale, 3) case damage and condition inspection during order staging, and 4) all cases will be double scanned to ensure that only approved codes are included.

USDA has verified the corrective actions taken by National Beef (California).

PURPOSE

The United States Department of Agriculture (USDA) has conducted an inquiry into the operations of National Beef (California), Establishment 21488, in order to assess events surrounding inclusion in a shipment to Japan of one box beef bone-in short loins incorrectly identified as Frozen Beef Plate Yoshinoya.

BACKGROUND

The export of U.S. meat products to other countries is facilitated by the activities of three separate but interdependent entities:

- 1) the U.S. meat and poultry industry,
- 2) USDA's Food Safety and Inspection Service (FSIS), and
- 3) USDA's Agricultural Marketing Service (AMS).

The U.S. meat industry is responsible for the slaughter of healthy animals and preparation of food products that are wholesome, properly labeled, and not adulterated. In addition to meeting U.S. food safety standards, the industry must meet all requirements imposed by importing countries. Both U.S. food safety requirements and the trade requirements of importing countries must be met before a product can be certified by USDA for export from the United States.

FSIS is responsible for the inspection of meat and poultry products and the certification of products for export to other countries. FSIS Directive 9000.1, Revision 1, "Export Certification," published March 1, 2006, provides an in-depth description of these responsibilities. The primary regulatory role of FSIS is to make critical determinations that meat and poultry products are not adulterated and meet all U.S. food safety standards for sale in domestic or international commerce. This regulatory activity is complete when FSIS applies the USDA mark of inspection. However, additional verifications are necessary after inspection is complete in order for FSIS officials to execute certifications of product for export.

AMS is responsible for developing Export Verification (EV) Program standards to ensure that establishments certified for export can meet the additional requirements of importing countries. These programs are approved and monitored by AMS for a fee, which is paid by participating establishments.

The combination of a USDA mark of inspection and an AMS EV Program provide assurance that U.S. meat and poultry products offered for export may be certified as meeting all U.S. food safety standards and importing country trade requirements.

EXPORT CERTIFICATION PROCESS

The export certification process for Japan is documented in FSIS Directives 9000.1 rev.1 and 9040.1 rev.3 (see Annex) as follows: An FSIS inspection program official receives an application for export (FSIS Form 9060-6) to Japan and verifies that it is complete and accurate and is signed by the applicant. The "Product as Labeled" block must show all products to be exported by their product code and description as they appear in the AMS list of approved products for the plant indicated on the application as the producing plant.

The FSIS inspection program official then compares the listed products on the unsigned application to the list of approved exportable products by the approved plant to determine product eligibility for export to Japan. If all products are found and determined to be produced after AMS approval of the plant, the inspection program official proceeds with export re-inspection as per FSIS Directive 9000.1 examining additional documentation presented with the application and a representative number of containers for condition.

If the documentation and condition of the product are acceptable, the FSIS inspection program official signs the export application, allows product to be stamped and signs the export certificates (FSIS Forms 9060-5, 9290-1 and the letterhead certificate for beef).

RESULTS OF USDA INQUIRY

USDA conducted an inquiry to determine whether the procedures and actions of National Beef (California) complied with U.S. export certification requirements and the import requirements of Japan.

Results are as follows:

1. Inclusion of ineligible beef products

- National Beef (California) management controls failed to prevent the inclusion of nonconforming product in a shipment of products otherwise eligible for export to Japan.
- National Beef (California) employees were responsible for packing boxes of beef for export to Japan in a manner that ensured packed product was consistent with box labeling.
- The mispack occurred because of a production practice that permitted pre-labeling of boxes, thus presenting an opportunity for packing error.

2. Product traceability

- USDA trace-back analysis confirmed all shipment documentation was verified during the export approval process.
- All FSIS and AMS export certifications of approved products were correctly performed.
- The one mispacked box has been verified as originating from an A40 cattle slaughter run.

3. Chronology of Events As Reported by National Beef (California)

To the best of National Beef's knowledge, following is the chronological chain of events:

- June 26, 2007 - The product was produced/ boxed at National Beef (California), Est. # 21488.
- July 27, 2007 - Product shipped to Icrest from Inland Cold Storage in Vernon CA. under MPG Certificate # 550910.
- August 4, 2007 – Product Arrived in Japan
- August 10, 2007 – MHLW/MAFF border inspections conducted
- August 28, 2007 – Shipment cleared customs
- April 19, 2008 – Product transferred to end-user processing plant
- April 22, 2008 – Non-conformance box found
- April 23, 2008 - Letter of Investigation and corrective action sent to USDA (District level as per instruction by FSIS in DC and FAS).
- April 24 - 25, 2008 USDA sent OPEER Investigator to National Beef (California) – Verbally stated that they found no issues
- May 2 , 2008 - USDA FSIS District had additional questions from OPEER Audit

RESULTS OF NATIONAL BEEF (California) INQUIRY

National Beef (California) conducted an internal review of the circumstances that resulted in the export of ineligible product to Japan. Following is a summary of that inquiry:

The root cause of a mislabeled box being exported to Japan was a National Beef (California) Fabrication Department practice of pre-labeling boxes before they were packed. That practice has ceased.

The Beef Plates were fabricated, bagged and boxed on a separate line from the short loins. National Beef (California) was not producing short loins for export to Japan. As per our QSA program the plant segregated product by grade and age coming into the fabrication floor. From there the plates and short loins go down separate boning tables. Products rejoin in a common case sealing area. Segregation is maintained in this area by a

product code label on the end panel of the box. When we produce Japan designated product for verified aged cattle, they are fabricated as a separate run on the fabrication floor. We verify that only approved labels are used product destined for Japan. As with all U.S. plants anything that is not destined for Japan is packaged and boxed in non-approved Japan codes.

This scenario happened when the employee correcting a damaged box of short loins grabbed a box and did not personally apply the product code label. This box had been pre-labeled for plates. Due to the location where this re-boxing occurred, the product did not go through the normal plant inspection process.

A trace back was conducted and all products exported with this load were verified as being eligible to export to Japan.

Since this incident, the QSA manual has been revised and an added hourly check for pre-labeled boxes is conducted in all packaging areas.

CORRECTIVE ACTIONS

National Beef (California), Establishment 21488, has taken actions to correct conditions that caused or contributed to the export of ineligible product to Japan. The corrective actions reported to USDA by National Beef (California) are as follows:

- National Beef (California) continues to use their internal procedure that boxes of product destined for export to Japan are checked for miss-packs prior to the box being sealed. Every box that is QA-checked receives a unique stamp on the inside lid of the box
- This stamp when used is applied at the end of the process. For plates, the stamp is applied in the separated room at the end of processing before the boxes go to the case sealing room. For all other export products the stamp when used is applied directly prior to the case sealer. The stamp identifies who checked the box. (Although the AMS QSA program does not require 100% box stamping as a specified product requirement, stamping of all QA inspected boxes is an internal tool used to ensure that plant QA personnel are inspecting boxes as per company expectations.)
- Although National Beef (California) does not require that every box contain a unique QA stamp every box of product that is destined for Japan is monitored/inspected by plant personnel/QA. As stated above the stamping of boxes by the QA is done as a way to help the plant ensure that the process is working.
- To further improve their process and QSA program to ensure that pre-labeling boxes for the EV Japan program does not re-occur, National Beef has revised the National Beef (California) plant QSA Program. The Plant QA group will audit each area where packaging is taking place for

products destined for Japan. The audit will be conducted once per hour during all production.

- This audit was added to the QSA Program to verify that there are no pre-labeled boxes in any production areas including re-boxing areas. Any "re-boxing" that may take place with Japan destined product is only done on the production floor. That process is monitored by plant management and QA. That product is then subject to plant/QA inspection like all Japan destined product.
- National Beef (California) added the written requirement that pre-labeling boxes is not acceptable in their program and added audit criteria to verify that they are in compliance with the revised program.
- Although National Beef (California) does not plan to use certain color boxes for all Japan destined products, the Beef Plates Yoshinoya will for the immediate future be packed in white boxes as a means to differentiate them from bone in short loins, which are packed in brown boxes. As stated earlier, the root cause for this failure was the practice of pre-labeling boxes which no longer occurs during the production of product destined for Japan. This change is reflected in the revised QSA program for the National Beef (California) plant.
- Employee training has been conducted verbally in a class setting with documented sign offs. Verification of training effectiveness is conducted by supervisors physically watching job task performance. Audits of the process will also verify that the training was adequate. (See Annex)
- With the elimination of pre-labeling boxes, employees now know what code they are physically packaging and will apply the label at the time of packaging. Export labels are not in close proximity to non-export labels.
- Product for export to Japan will be checked in the following ways after boxing: 1) Final verification prior to case sealer, 2) weight range for product code at the final scale, 3) case damage and condition inspection during order staging, and 4) all cases will be double scanned to ensure that only approved codes are included.

CONCLUSIONS

USDA conclusions from this inquiry are as follows:

- The one box of ineligible beef was not intended for export to Japan as it was produced for the domestic market.
- The ineligible product was inspected and passed by USDA for human consumption and was at the time of export a safe and wholesome product fit for consumption in the United States.
- Documentation for the shipment complies with the Specified Product Requirements under the EV Program for beef to Japan, including being from age-verified animals.
- USDA agrees with National Beef (California) that the root cause for inclusion of ineligible product in an export shipment to Japan was a plant-

specific mispacking error that occurred because the establishment was pre-labeling boxes for export.

- USDA has reviewed the corrective actions taken by National Beef (California) and finds them sufficient to address and resolve the root cause of this shipping mistake.
- In order for ensuring only eligible products be shipped to Japan, FSIS cautioned export facilities by posting a reminder in the FSIS Export Library on July 02, 2008. (See Annex)
- USDA is prepared to resume the certification of National Beef (California) Establishment 21488 products for export to Japan immediately upon acknowledgement this report is accepted by the GOJ.

ANNEX

Annex 1 FSIS Directive 9000.1 Rev. 1

Annex 2 FSIS Directive 9040.1 Rev. 3

Annex 3 Employee training

- Annex 4 Export Requirements for Japan JA-144 (Jul 2, 2008)

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS DIRECTIVE

9000.1,
Revision 1

3/1/06

EXPORT CERTIFICATION

I. PURPOSE

The export certification process serves to instill confidence in United States (U.S.) meat and poultry products throughout the world. Therefore, the Food Safety and Inspection Service (FSIS) must continue to ensure a high level of integrity, security, and accuracy within the process. This directive provides a clear set of standards for District Offices (DO) and inspection program personnel to follow. This directive clarifies the process if an FSIS certifying official feels that he or she is unable to sign an export certificate; makes clear that a facsimile of FSIS Form 9060-6, Application for Export Certificate, may be used to provide the information requested in that form; clarifies the purpose of the Export Library; and clarifies other aspects of the directive.

II. CANCELLATION

FSIS Directive 9000.1, dated 9/9/99

III. REASON FOR REISSUANCE

FSIS is reissuing this directive in its entirety to clarify Agency policy regarding the export certification process.

IV. REFERENCES

21 U.S.C. 616
9 CFR 156, 307.4(c), 312.8, 316.5, 317.1, 317.7, 318.2, 322.1, 322.2, 322.4, 325.8, 325.13, 350, 351, 354, 355, 362, 381.37(c), 381.66, 381.104, 381.105-107, 381.128, 381.193
FSIS Directives 5110.1, Revision 1 and 9040.1, Revision 3

V. BACKGROUND

A. As specified in FSIS regulations, upon application by an exporter (applicant), an FSIS inspection program employee is authorized to issue official export certificates for the shipment of inspected and passed products to any foreign country. The applicant provides a completed FSIS Form 9060-6 to an inspection program employee. An inspection program employee may sign the application and

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issue (but not sign) an export certificate (FSIS Form 9060-5, Meat and Poultry Export Certificate of Wholesomeness) and export stamp, only after he or she has:

1. verified that the information on the application is correct, and the applicant has signed the application attesting to the accuracy of the information;
2. verified that the country requirements as specified in the Export Library have been met; and
3. re-inspected the product as set out in Part VII of this directive and has no reason to conclude that the product has become adulterated or unwholesome, or that the product is mislabeled or ineligible for export to the country listed on the application.

The inspection program employee should request from the exporter any documentation needed. (See paragraph VII. of this directive for more specific direction.)

B. After receiving a completed export certificate from an exporter, an FSIS certifying official (inspection program employee that signs the certificate) verifies the information by comparing the information on the certificate to the information on the certified (signed) application. The statement on the export certificate is a certification that may be based on information provided to the certifying official, and he or she need not have been directly associated with the inspection of the product. If further clarification is needed, the certifying official will request additional information or documentation from the inspection program employee who signed the application or from the exporter. Once the certifying official is assured that all information is accurate, he or she is to sign the export certificate. If a certifying official refuses to sign a certificate, he or she should have good and sufficient reasons (e.g., the documents are incomplete, or he or she cannot verify, based on the information provided, that the product meets the export requirements). The certifying official should document the reasons for his or her refusal to sign and notify the exporter. The exporter may correct the reasons identified by the certifying official, or forward a copy of the export documentation to the next-line supervisor (See paragraph VII. of this directive for more specific direction.)

C. If a certifying official refuses to sign a certificate, his or her refusal and the reasons for doing so will be reviewed by the next-line supervisor. Based on the review, the next-line supervisor will take one of the following actions:

1. uphold the refusal of the certifying official to sign the export certificate on the grounds that the information presented by the exporter is not adequate to justify signing the certificate; or
2. decide, based on his or her review of the record, that the signature is justified and sign the certificate. If a Public Health Veterinarian (PHV) signature is required, the next-line supervisor would forward, if necessary, to the appropriate DO personnel the findings with a recommendation that the certificate and other export documents be signed.

D. If the Front-line Supervisor signs the export certificate and determines that the certifying official's refusal to sign the export certificate was not based on good and sufficient reasons as outlined in Section B above (e.g., the documents are incomplete, or he or she cannot verify requirements), the Front-line Supervisor documents the incident and forwards a report to the DO. The DO will review the information from the Front-line Supervisor and make a decision whether or not to forward the information to the Labor and Employee Relations Division, Employee Relations Branch, for determination of appropriate administrative action, including disciplinary or adverse action.

E. When export certification services are performed in an official establishments, the issuance of export certificates that are required by 9 CFR Part 322 and 381.104 through 381.111 are not reimbursable services. Only the execution of certifications that are in addition to FSIS regulatory requirements, e.g., additional certifications that are required by the importing country, and the transferring of products for export as described in 9 CFR 322.3, are considered reimbursable services. When export certifications services are performed at non-official establishments, the services are reimbursable and charged as set out in FSIS Directive 5110.1.

VI. EXPORT LIBRARY

A. The Export Library contains the requirements that have been officially communicated to FSIS by the country to which the product is to be exported. It should be used to determine the eligibility of shipments for export and includes information such as:

1. certificate requirements
2. eligible and ineligible products
3. facility requirements
4. labeling requirements
5. edible and inedible products
6. plant requirements to become eligible to export
7. PHV signature requirements, if any
8. animal health requirements
9. list of plants eligible to export

10. export notices

11. Frequently Asked Questions

B. Ways to access information from the Export Library:

1. on the internet at:

www.fsis.usda.gov/Regulations&Policies/Export_Information/index.asp

2. Outlook: Public Folders/All Public Folders/Export Library

3. The FSIS Technical Service Center (TSC) at 1-800-233-3935 or 402-221-7400

C. For information regarding animal health status and certification:

1. consult the Export Library;

2. consult the TSC at the above numbers; and

3. after consulting the Export Library and the TSC, if specific questions remain regarding the status of a particular disease within a state, consult the Animal and Plant Health Inspection Service (APHIS) Area Veterinarian in Charge (AVIC) for that state. A list of AVIC's is available on the APHIS website at:

<http://www.aphis.usda.gov/vs/areaoffices.htm>

VII. APPLICATION FOR EXPORT CERTIFICATE

A. Upon receiving an application for export, an inspection program employee reviews the application to verify that it is complete and that all pertinent information is included.

B. An inspection program employee reviews the application to verify that the requirements of the receiving country have been met. The inspection program employee verifies statements on the application, when necessary, by requesting appropriate documentation from the applicant. The inspection program employee should inform the applicant that the process may be expedited if he or she provides the necessary documents (e.g., Export Verification record eligibility information), along with the application.

1. If the inspection program employee has concerns as to whether each product listed on the application is eligible for export to the country listed on the application, he or she is to:

- a. raise such concerns with exporter;
- b. document a memorandum of interview addressing what was discussed, and whether the concerns were adequately addressed; and
- c. provide a copy of the memorandum to the applicant and maintain a copy in the inspection files.

C. An inspection program employee performs a sensory evaluation of the product to determine its eligibility for export. The inspection program employee should be particularly alert for signs that product is or may become adulterated or unwholesome (e.g., off-condition odor, torn, damp cartons, or other evidence of insanitary handling or storage).

1. If the inspection program employee finds signs of poor product handling and storage, he or she may examine the product as set out in FSIS Directive 9040.1, Revision 3, Re-inspection of Product Intended for Export, and take any necessary actions when the product may be adulterated as provided in FSIS Directive 5000.1 (at official establishments (e.g., regulatory control actions or issuance of Non-Compliance Records (NRs)) or FSIS Directive 8410.1 (at non-official establishments (e.g., detaining products)).

2. Also, if an inspection program employee has reason to question whether the products are properly identified and labeled to meet FSIS regulatory requirements and the requirements of the importing country, he or she may examine the product as set out in FSIS Directive 9040.1, Revision 3, and:

a. when the product is not properly labeled or misbranded, take the appropriate action as provided in 9 CFR part 500 and FSIS Directive 5400.5, (at official establishments issuing NRs, taking regulatory control action) or FSIS Directive 8410.1 (at non-official establishments); or

b. when the product in the container or the labeling of the product does not meet the requirements of the importing country, raise the concern with the applicant and prepare a memorandum of interview as described in paragraph VII. B. 1. b. and c. above.

D. An inspection program employee verifies that the foreign language sticker, if required, shows no wording other than that shown on the approved label.

NOTE: The inspection program employee also verifies that any required letter of guarantee from the exporter supplying the foreign language sticker, which certifies that the sticker is an accurate translation of the wording on the approved label, is included.

E. After the inspection program employee completes A. through D. above, and everything is acceptable, he or she:

1. signs the application;
2. retains a copy of the application and any accompanying documents for filing;
3. returns the originals to the applicant;
4. provides the export certificate for completion by the exporter and issues the export stamp;
5. permits the establishment to stamp product; and
6. secures the stamp after the establishment finishes stamping the product.

F. An inspection program employee may permit an establishment to stamp boxes and complete the export certificate when he or she is not present (pre-stamp). However, the inspection program employee should verify that the establishment can ensure the stamp will be applied in a clear and legible manner only to boxes that are in sound condition before presenting the stamp to be used. An inspection program employee performs re-inspection as specified in paragraph VII. C. anytime he or she determines that it is necessary.

NOTE: An inspection program employee may allow an establishment to use a computer generated export stamp (sticker) as long as the establishment identifies the number of stickers produced before applying them to product and provides the inspection program employee with any unused stickers.

G. On the day inspection program personnel perform the procedures above at official establishments, they are to record Inspection System Procedure code 06A01 as performed. Inspection program personnel only record the procedure as performed once in a day and not for each application received. At a non-official establishment, inspection program personnel charge for the service as set out in FSIS Directive 5110.1.

VIII. EXPORT CERTIFICATES

A. The certifying official receives the appropriate completed export certificate (FSIS Form 9060-5), other certificates as required by the importing country (see paragraph X.), letterhead certificates (see paragraph VIII. C.), and a copy of the signed application (FSIS Form 9060-6) from the exporter. The certifying official verifies that the information on the certificates is consistent with the information on the application by reviewing any attached documentation or checking in the Export Library and no additional statements or documents not provided for in the Export Library are added.

B. If needed, a continuation sheet is prepared by the exporter when multiple items in the shipment exceed the space available on the face of the certificate. The continuation sheet is to be prepared in quadruplicate and includes:

1. date issued;
2. title (e.g., Continuation Sheet for Export Certificate # _____);
3. product description – name, boxes, weight, as indicated on the face of the certificate; and
4. the certifying official's name and signature, followed by the district number. The name and code number must be the same as that on the face of the certificate.

C. In some cases, a USDA/FSIS letterhead certification is necessary and is issued for certain products when specified in the individual country requirements found in the Export Library. If the exporter submits a letterhead certificate along with the certificate, the FSIS certifying official is to verify that:

1. the most current version of the letterhead certificate found in the Export Library was submitted;
2. no statements on the letterhead certificate have been changed from what appears in the Export Library and no additional statements have been added;
3. the certificate is dated by the exporter; and
4. any certification required by another USDA Agency (e.g., AMS) is provided along with the completed letterhead.

The letterhead certifications are prepared in quadruplicate and must include:

1. corresponding export certificate number;

2. certification statement (e.g., I (name of inspector/veterinarian) certify...);
3. inspector/veterinarian name typed/printed, followed by professional degree, if applicable, and the District number;
4. signature of inspector/veterinarian exactly as typed/printed; and
5. date signed.

D. If the certifying official has questions about the information on the application (FSIS Form 9060-6), the certificate (FSIS Form 9060-5), any other certificates, including letterhead certificates, he or she does not sign the certificate until he or she has contacted the inspection program employee who signed the application or the exporter. Any communication that the certifying official has with the exporter should be documented in a memorandum of interview as described in paragraph VII. B. 1. b. and c. above.

E. Before signing the certificate, the certifying official:

1. checks the certificate for accuracy and corrections;
2. checks the boxes indicating that the animal received ante- and post-mortem inspection;
3. checks for attachments and ensures that the exporting firm has lined-out any unused space; and
4. initials minor erasures or alterations, unless this is not acceptable to a foreign country (see Export Library to verify if receiving country permits erasures or alterations).

F. The certifying official signs the original certificate in the signature block in **other than** black ink, all continuation sheets, and other certifications, including letterhead certifications. Also, if the importing country requires a PHV's signature, the certifying official is to include his or her professional degree. The certifying official should not stamp the certificate with the export stamp unless required by a receiving country as specified in the Export Library.

IX. REPLACEMENT CERTIFICATES

A. A certificate replacing an original certificate is a re-certification of the product's condition **at the time of the initial export certification**. A replacement certificate for a lot **does not** represent that lot's current condition. A replacement certificate may be issued in situations such as, but not limited to:

1. the original certificate did not carry required information;
2. the original certificate carried incorrect information;
3. the name of the consignee or exporter has changed; and
4. the certificate has been lost.

B. The replacement certificate must be dated with the same date as that shown on the original certificate.

C. A request to increase the box count or the total net weight shall not be honored unless the product is re-inspected in accordance with paragraph VII. C. of this directive.

D. An application (FSIS Form 9060-6) is submitted to request a new certificate and must be accompanied by (if possible) the original and all copies of the original certificate. Exception: In the case of lost certificates, the exporter should provide a letter of assurance to the certifying official stating the certificate will be returned if found.

E. Multiple export certificates may be issued to replace an original if the exported product has been subdivided for shipping to more than one consignee, and an export certificate is required for each part, provided that:

1. the lot was originally manifested in sufficient detail to enable the direct correlation of containers, identification, and corresponding weights on the new certificate; and

2. the original certificate is returned for cancellation.

F. Before signing a replacement certificate, an inspection program employee:

1. verifies that the following statement is in the top left margin or in the "Remarks" block of the new certificate: "Issued in lieu of certificate no. _____. The export mark on the product covered by this certificate shows certificate no. _____."

2. obtains the superseded certificate (if possible), and:

- a. verifies that it is marked in the left margin or in the "Remarks" block with the number of the certificate which supersedes it (e.g., "Superseded by No. _____"); and

- b. attaches it to the "inspector's" copy of the replacement certificate and files it in the government office.

X. INVENTORY

A. Official export stamps must be controlled at all times. Export certificates, stamps, and pertinent inventory records must be maintained under official lock or seal when not in use.

B. The inspection program employee at each establishment must maintain an accurate inventory record of export certificates issued and voided certificates.



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