

**Evaluating the Equivalence of
Foreign Meat and Poultry Food Regulatory Systems
PORT OF ENTRY REINSPECTION**

- Slide 1: For the next 10 minutes or so, I will review some of the details related to port of entry reinspection; and how data is collected, stored, and used by FSIS in making equivalence determinations.
- Slide 2: As previously discussed, FSIS relies on its initial determination of a foreign country's eligibility, coupled with on-going audits to provide assurance that products shipped to the U.S. are safe, wholesome, and properly labeled and packaged. Port of entry reinspection supplements the assessment of the effectiveness of the foreign inspection system by continuously verifying that the foreign inspection system functions in an equivalent manner.
- Slide 3: In 1999, the United States imported approximately 3.3 billion pounds of meat and poultry from 31 countries. Of this volume, about 86% was fresh meat, 1% was fresh poultry, and 13% was processed meat and poultry products.
- Slide 4: In 1999, the U.S. imported almost 5.4 million pounds of egg products. Of this volume, 89.9 % was in liquid form, 8.5% in frozen form, and 1.6% in dried form. Canada is the only country exporting these products to the U.S.
- Slide 5: Three countries are responsible for almost 85% of all the meat and poultry products imported into the United States. Canada accounts for 49.8%, while Australia accounts for 21.8 % and New Zealand, 13.6%. The remaining 14.8 % are imported from the remaining 28 countries.
- Slide 6: FSIS reinspects meat and poultry products at the port of entry before they are allowed into U.S. commerce. Egg products are subject to reinspection at destination. The term reinspect is used because the products have already been inspected and passed in the originating country. Each shipment is accompanied by a foreign health certificate certifying the wholesomeness of the product.

- Slide 7: There are about 75 FSIS inspectors dedicated to import reinspection activities. All shipments must be presented to FSIS for reinspection at one of approximately 150 official import establishments. We call these establishments I-houses. They operate under a grant of federal inspection from FSIS and are required to have adequate facilities to perform the reinspection tasks required by the type of product presented to FSIS.
- Slide 8: As illustrated on this slide, I-houses are located in close proximity to the perimeter of the country, clustered around the major ports of entry, such as Long Beach, Seattle/Tacoma, the Canadian border, NY/NJ, Philadelphia, Baltimore, Miami, New Orleans, Houston and El Paso.
- Importers are responsible for making arrangements for reinspection with I-house plant management, which may or may not be in the same port where the product is off-loaded. As an example, product from Australia may off-load in Los Angeles, then travel across the U.S. by rail under the control of the U.S. Customs Service (via in-bond transit) to the port of Philadelphia, where entry is made.
- Slide 9: With the exception of product from Canada, every shipment is staged for reinspection. The inspector is able to walk around each pallet, checking the general condition of the shipment, assuring that cartons are appropriately labeled and that there is no evidence of transportation damage, and that the box count is properly certified. In addition, the inspector ensures that the health certificate matches the shipment.
- Slide 10: In addition, there are additional types of inspections, which we refer to as “TOIs”, that are performed, depending on the type of product being presented.
- Slide 11: Examples of additional TOIs include: an examination for product defects; laboratory analyses for microbiological contamination, chemical residues, food chemistry, or species identification; net weight checks, and/or condition of container checks.

- Slide 12: Reinspection activities are performance-based. In other words, better performing foreign establishments have their products reinspected less frequently.
- Slide 13: In order to manage these reinspection activities, all shipments and inspection results are entered into a central database, known as the Automated Import Information System, a system we refer to as the AIIS. This database links all ports of entry, so that any action taken by an inspector at one port is immediately considered when an inspector draws an assignment at another port of entry for the same type of product from the same foreign establishment. This level of communication also enables FSIS to be more efficient and effective in identifying the status of product in the United States, such as whether it has been entered, reinspected, and released. The AIIS went into operation in 1979 and continues to provide compliance histories on each establishment in every foreign country eligible to export meat and/or poultry products to the United States. The AIIS receives and stores reinspection results, then uses this information to select subsequent shipments for reinspection, assigning the scope and intensity of the reinspection.
- Slide 14: The AIIS system has the ability to develop complete compliance records for each country and establishment exporting to the United States;
- Slide 15: The AIIS system has the ability develop comprehensive product histories by establishment;
- Slide 16: and the AIIS system has the ability to increase or decrease reinspection of products by country or establishment.

The reports produced by the AIIS are used in numerous ways, including as trend data to prepare for audits of the foreign inspection system, as well as to provide direct feedback to the foreign country regarding their performance.

- Slide 17: When the shipment arrives, the inspector enters information into the AIIS. An assignment will not be generated unless the foreign country, the establishment, and the type of product is eligible to export to the United States. Import categories have been established to address the various restrictions related to animal health, as well as to enable FSIS to track the type of product. These import categories include: Canned or Fresh product for pork, beef, sheep, goat, and poultry (including a combination of these products);
- Slide 18: Cooked or Cured product for pork, beef, sheep, goat, and poultry (including a combination of these products); and
- Slide 19: Fresh or Processed horse meat products.
- Slide 20: The AIIS determines the reinspection assignment based on the compliance history of the country, foreign establishment, and type of product. As an example, the types of inspection for frozen cooked beef are laboratory analyses which includes listeria, salmonella, and/or species identification, and for product examination. The AIIS product code for frozen cooked beef is BHMGAQ.
- Slide 21: The inspector follows the procedures outlined in the Import Manual of Procedures for the TOI assigned. Upon completion of the reinspection, all inspection results are entered into the AIIS. Once products pass reinspection, they are stamped with the official mark of inspection and allowed to enter into U.S. commerce.
- Slide 22: Products not meeting U.S. requirements are stamped “refused entry”. When this happens, the importer: (1) has 45 days to export the product, (2) may choose to destroy the product, or (3) can convert the product to animal food. However, conversion to animal food requires the permission of the Food and Drug Administration. FSIS maintains control over these products until disposal is achieved. Also, if the importer chooses to re-export the product to a country other than the country of origin, then FSIS provides third-party notification to the country of destination.

Slide 23: There are four levels of sampling frequency for reinspection that identify the extent to which each product offered for import is reinspected. The categories are classified as: Normal, Skip-1, Skip-2, and “tighten and hold.” A foreign establishment is not limited to a single level of inspection, but rather the level of inspection is set for each type of inspection (TOI) on each product. A shipment of hams may be at Skip-1 for net weight but under “normal” for lab analyses.

Slide 24: The “Normal” level means that all lots are reinspected;

Slide 25: The “Skip-1” level means that 1 out of every 4 lots is reinspected. In other words, each lot eligible as “Skip-1” has one in four chances of being reinspected;

Slide 26: The “Skip-2” level means that 1 out of every 12 lots is reinspected. In other words, each lot eligible as “Skip-2” has one in 12 chances of being reinspected.

Within the time period that shipments are in Skip-1 and Skip-2, sampling occurs with no predictability.

Slide 27: “Tighten and Hold” shipments are held by FSIS pending test results.

Slide 28: Residue controls are a major feature of an inspection system that must be judged equivalent to the U.S. system before the country becomes eligible. In addition to receiving an annual update to the testing performed in the foreign countries and auditing the foreign country’s system to ensure adequate controls are in place for chemical residue analyses, FSIS samples products at the POE.

Slide 29: On an annual basis, FSIS determines what compounds products will be analyzed for, as well as the frequency of sampling. The initial rate is based on the volume of product imported to the U.S. the previous year. Violative positive test results are based on U.S. tolerances or action levels for the compound in question.

Slide 30: In addition, FSIS randomly samples specific imported products at POE for microbiological testing: Modeled after the domestic programs, Ground beef and veal are tested for E coli 0157:H7; ready-to-eat further processed products are sampled for Listeria monocytogenes and/or Salmonella; and dry, semi-dry fermented sausages are sampled for E coli 0157:H7, Listeria, Salmonella and/or Staphylococcal aureus enterotoxin. Sampling frequencies are monitored to assure consistency with the domestic program's sampling. The same action is taken on imported products with positive results as that of domestic products with positive results.

Slide 31: In 1999, 1 chlorinated hydrocarbon violation occurred and was reported by our FSIS laboratory. In addition, there were 21 positive results for Salmonella, 12 positive results for Listeria and 3 positive results for e. coli.

Slide 32: When positive sample results for imported products are detected by the laboratories, results are reported both electronically as well as via fax to several offices within USDA. Immediately, these offices work together to gain control of the violative product, both in the United States as well as in the foreign country.

Slide 33: By entering the positive results into the AIIS, the foreign establishment is immediately placed on "tighten and hold." In addition, product is located in the United States and disposition is determined.

Since the majority of samples selected are considered "monitoring", the agency does not require the product to be held pending results. Product that has been inspected and passed may still be at the import establishment; it may have moved to an FSIS inspected processing establishment; or it may have been distributed into commerce.

The importer does have the option to place the product under "voluntary hold" until the results are received. In doing so, the product would not be stamped as "inspected and passed" and

would be refused entry if violative positive results were reported.

Product that has been released into commerce by the importer may be recalled, depending upon the availability and the nature of the violation. In addition, “like product” arriving from the same establishment, from the same production lot, may be retained as well for further sampling.

- Slide 34: While product is being located in the United States, the International Policy Division notifies the foreign country of the violation. This contact initiates an investigation by the foreign inspection system to determine the cause of the violation, as well as to take appropriate corrective action. In addition, they are able to prevent future shipments from the same production lot without adequate follow-up testing. When the foreign country submits its report regarding the violation, our technical experts within FSIS evaluate the information to assure that adequate action was taken. This information is also shared with the foreign review officers that audit the foreign country for appropriate on-site follow-up.
- Slide 35: On rare occasions, there may be repeat violations from the same country and/or establishment. FSIS considers more than one violation as an indicator that there may be something potentially wrong with the controls in the foreign country. In this situation, a more aggressive approach is taken, through conference calls and discussions regarding the problem.
- Slide 36: In conclusion, the data stored in the AIIS provides a record of the effectiveness of a foreign country’s inspection system. This data enables FSIS to shift resources, both at the POE and in the audits performed in the foreign countries, to focus on foreign inspection systems that may have potential health risks.
- Slide 37: Port of entry reinspection completes the triad of data that is used in foreign inspection system equivalence evaluations.

That concludes my presentation. I hope my comments today have been helpful to you.