

## **SLAUGHTER/PROCESSING QUESTIONNAIRE**

**For each question and request, we have cited the sections in our regulations or other reference material that governs our response(s). In addition, we have provided examples of any forms, charts, or other documents applicable to each question or comment.**

### **A. Program Organization**

1. For each of the products under this application, what governmental agencies enforce the relevant laws and regulations relating to the testing, approval, and control of: (a) additives (including the use of irradiation), (b) packaging materials, (c) nonfood compounds, (d) residues, and (e) slaughter/processing requirements (canning, de-boning, grinding, etc.)? Include organizational charts for each of these agencies.
2. What is the functional relationship among these government agencies and between these agencies and any separate activities at state, provincial, or local levels?
3. What personnel, training, equipment/resources, and other facilities are utilized to enforce and fulfill the responsibilities of the meat and/or poultry inspection system regarding: (a) additives (including the use of irradiation), (b) packaging materials, (c) nonfood compounds, (d) residues, and (e) slaughter/processing requirements (canning, de-boning, grinding, etc.) for each of the products under this application?
4. Within the Meat and Poultry Inspection Program, who is responsible for setting and implementing microbial guidelines in the products produced?

### **B. Additives**

1. What authority determines if food additives are safe for human consumption?
2. What authority exists for enforcing and controlling the level and use of additives, including the use of irradiation, in meat and/or poultry products?
3. What are the permitted additives for meat and/or poultry and what are the allowable tolerances and limits for each additive? (Provide a comparison between your country and what is allowable in the United States.)

4. What controls are in place in establishments to ensure that only additives approved for use in meat and poultry establishments in the United States are used and that respective the United States tolerances and limits for each additive are not exceeded?
5. What are the testing frequencies and laboratory testing procedures used to test meat and/or poultry products and their ingredients for additives? (Provide a list of the additives that are tested for each applicable product or ingredient.)
6. What type of laboratory facility is used for the analyses (private, government, or company) of additives?
7. How are test results reported? Who receives these reports when allowable tolerances are exceeded? What preventative and corrective actions are taken to resolve problems revealed by test results?
8. How is the purity of additives determined and verified? Who sets the standards and what are the analytical methods used? Does the supplier certify, in writing, that a particular standard of purity is being met?

#### C. Control of Packaging Materials

1. What laws and regulations control the adequacy and use of primary and secondary packaging materials as acceptable for use with product prepared for consumption in the United States? What part of the government is responsible for implementing and maintaining the United States, or equivalent, standards?
2. What procedures, tests, and/or criteria are used to determine material and chemical acceptability and to ensure that only authorized and approved packaging materials are used in each exporting establishment?
3. To what extent are manufacturers required to guarantee the composition of the packaging material they manufacture?
4. How are exporting establishments kept abreast of the current list of approved packaging materials and manufacturers? How often is the list updated?

#### D. Control of Nonfood Compounds

1. What laws and regulations control the use of nonfood compounds (such as cleaning/sanitizing compounds and pesticides) in establishments where the food products under this application are prepared for consumption in the United States?

2. What are the procedures used for approving nonfood compounds and how does the government ensure that only approved nonfood compounds are received and used in each establishment exporting to the United States?
3. To what extent are manufacturers required to guarantee the composition and/or strength of the nonfood compounds they manufacture?
4. How are exporting establishments advised of recently approved (or unapproved) nonfood compounds and manufacturers? Is an updated list or notice provided and how often is the list or notice updated?

E. Processing Requirements (Canning, Deboning, Grinding, etc.)

1. What is the organizational name, function, responsibility, and authority of those responsible for approving the formulations, methods of preparation, and product standards of processed products, including thermally processed products?
2. What is the approval process for thermal and other processing procedures/activities (schedules) that require government approval? What documentation formally states that a thermal, or other, processing schedule is approved?
3. Where applicable, how do you verify that specific and/or approved processing schedules and/or procedures are being followed? How often are records reviewed and how are process deviations handled?
4. Where applicable, what are the requirements to ensure that rigid, and other, product containers are properly closed and/or sealed? Is lead solder used in can seams?
5. What are the requirements and procedures to ensure that thermal, dry cured, or other processing systems are properly constructed, instrumented, and operated?
6. What are the record-keeping requirements to document the adequacy of each approved process. What records ensure the adequacy of other critical control factors in thermal, or other, processing operations?
7. What are the food processing standards for processing meat and poultry products to render them shelf-stable? What are the allowable limits for pH and A<sup>w</sup>?
8. What are the procedures used to incubate cans, pouches, or their equivalent from lots of shelf-stable processed products prior to shipping and/or during shipping?

9. What are the standards for non-retorted foods that do not require refrigeration?
10. What are the refrigerated storage standards for products requiring refrigeration?

F. Testing/Monitoring Programs

1. What microbiological monitoring programs cover applicable meat and poultry products. Describe these programs in detail and provide examples of the data that is recorded. How is the data used/analyzed?
2. How are microbial guidelines and monitoring programs used as a measure of effective sanitation? Specify what guidelines or programs apply to each product under this application. Describe guidelines not covered in 1. above.
3. What other (non-microbiological) monitoring procedures are used to ensure the proper preparation, processing, and handling of product, e.g., the incubation of cans or pouches of shelf stable processed products prior to shipping and/or during shipping?
4. For each of the products under this application, what procedures do you follow for analyzing can or container defects, e.g., how are lots of shelf stable product examined for "condition of container" prior to shipping?
5. What are the criteria for "Potable" water? What requirements do you have for ensuring that potable water is used during the canning and processing of meat and poultry products? What requirements do you have for the water used to clean and rinse processing equipment?
6. How are privately owned laboratories involved in microbiologic testing to determine and/or monitor the compliance meat and poultry of products?
7. For the testing and monitoring programs stated above, what procedures or guidelines are used when corrective actions are required? What are the action levels for these programs?
8. For each product, how many samples are analyzed per year for microbiologic characteristics, pathogens, and foreign particle contamination before, during, and after processing under each testing program? Describe the statistical analysis used to determine the frequency and type of sample taken. Provide a copy of at least one full year's data (from current year) from each program.

9. For each microbiologic characteristic that is not part of a routine, on-going sampling program, how many samples are analyzed per year and how are the results reported? Provide a summary of most recent full year's data.

#### G. Laboratories

1. How many laboratories are used to perform microbiologic testing? For each laboratory, indicate whether it is a federal, private, or 'other' type of laboratory and describe the tests that are performed there.
2. Is each laboratory approved to perform applicable microbiologic testing? What is the approval process?
3. What are the requirements and qualifications of the microbiology supervisor and of the bench microbiologist? If you have a microbiology staff at headquarters, describe and list their functions and responsibilities.
4. Are standardized analytical methods used in the laboratories? Are the analytical methods AOAC approved or internationally recognized? Describe the microbiologic procedures/methods and provide a copy of the worksheets that are used.
5. How do the quality control or quality assurance programs in approved laboratories ensure accurate and consistent analyses? Describe how the government ensures that the programs produce accurate results and provide examples of the data obtained from this program.
6. If applicable, how does the government ensure that the results of analyses performed at privately owned laboratories are accurate?

#### H. Control of Non-compliant Product

1. What procedures and instructions do you follow for the control and disposition of product that does not comply with the United States, or equivalent, standards?
2. If applicable, who authorizes the reprocessing of non-compliant product and how is the integrity of the product maintained?
3. What procedures do you follow to certify acceptable products or re-certify previously non-compliant products for export?
4. What tests are performed and what do you do with the results when cans and other product containers are submitted to a laboratory because they are swollen or otherwise defective?

5. What are the procedures for investigating consumer complaints or consignor/ consignee complaints?
6. What actions are taken to protect the United States and other consumers when violative product has already left the processing establishment? Provide a copy of the directives and procedures used for recalling product.

I. Generic Escherichia coli (E. coli) Testing

1. What are the laws, regulations, and official directives that mandate that export establishments validate their process controls through microbiological testing during slaughter operations to prevent fecal contamination? The program documents must describe and mandate that the program will:
  - a) be supported by analytical test results, nationwide microbiological baseline surveys and other scientific data.
  - b) identify sample sites, frequency of sampling, and sampling techniques.
  - c) use approved analytical methods.
  - d) require the use of reputable laboratories which adhere to quality control/quality assurance programs.
  - e) require that results be recorded and used to control fecal contamination by the establishment.
2. What are the laws, regulations, and official directives that mandate an effective enforcement program? The program documents must describe and mandate that:
  - a) establishments take action to prevent product contamination and take corrective action when contaminated product is found.
  - b) the foreign inspection system takes effective enforcement action, including suspension and withdrawal of inspection of those establishments which fail to control fecal contamination or fail to take corrective actions based on the results of the establishment's microbiological testing program.

## J. HACCP Plans

1. How does the government inspection system describe, specify, and mandate a system whereby meat and poultry establishments must identify and evaluate the food safety hazards that can affect the safety of their products, institute controls necessary to prevent those hazards from occurring or keeping them within acceptable limits, monitor the performance of controls, and maintain records routinely? How is this system firmly established in the government's requisite laws and regulations?
2. How does the government inspection system verify the effectiveness of processes and process controls designed to ensure food safety? How does the government inspection system ensure that the government will:
  - a) carry out a general review of establishment plans to identify, evaluate, and prevent food safety hazards?
  - b) continuously verify establishment production, processes, and controls?
3. How does the government inspection system ensure an effective enforcement program? How does the government enforcement program ensure that:
  - a) the establishments take action to correct process deviations that result in food safety hazards, determine how non-compliant product would be handled, ensure that no safety hazards exist after the corrective actions are taken, and define measures to prevent recurrence?
  - b) the appropriate government regulatory agency takes effective enforcement actions, as required; including suspension, withdrawal of inspection, and, in the case of falsification of records, criminal prosecution?

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