

## ENFORCEMENT QUESTIONNAIRE

**For each question and request, cite the sections in your regulations or other reference material that governs your response(s). In addition, provide examples of any forms, charts, or other documents applicable to each question or comment.** (Questions A through L address compliance and M through P address economic fraud.)

### A. Program Organization

1. For each of the products under this application, what national and other government agencies enforce the relevant laws and regulations relating to compliance activities? Compliance activities include the investigation of violations of inspection laws; controlling violative products through detentions, civil seizures, and voluntary recalls; and assuring that appropriate criminal, administrative, and civil sanctions are carried out? 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 the investigation of violations of inspection laws; controlling violative products through detentions, civil seizures, and voluntary recalls; assuring that appropriate criminal, administrative, and civil sanctions are carried out; and other compliance activities for each of the products under this application?

### B. Livestock and Poultry Husbandry

1. What animal species are used for human food in your country? The list should include domesticated and wild animals or fowl, such as cattle, swine, horses, kangaroos, camels, deer, donkeys, ducks, and geese.
2. For each applicable animal species at each stage of development, what types of movement take place between producers/facilities? The list should include movement through sales yards, from farm to farm, from weanling to yearling facilities, from farm to direct slaughter, from hatchery to feeders, and other types of movement or animal transfer.
3. How does your country ensure that sick, diseased, or dead animals (or the meat from these animals) are not slaughtered, processed, packaged, and/or co-mingled with carcasses or product eligible for export?

C. Livestock and Poultry Controls

1. What type of identification program do you have for each species? Describe the program(s) in detail, including a description of the health records kept for vaccinations; records kept for government subsidies, taxes, or loans; residue or other trace-back records; and other identification activities.
2. Are sales yards and poultry producers required to be licensed? Indicate record-keeping requirements, such as sales transactions and listing animal owners and/or buyers.
3. Are health certificates required for the movement of livestock or poultry? Who prepares the health certificates and who is required to check the animals before, during, and/or after transporting them?
4. Are livestock or poultry imported from other countries? If so, what records are kept? Are there health or other restrictions?
5. What procedures and records are required for the movement of dead, diseased, 'downer', or otherwise unsound animals and/or poultry either from farm to slaughter or between other facilities? For example, are health papers required or is the hauler required to have a special license?

D. Slaughter Facilities

1. What are the various types of facilities where animal slaughter can take place? For each type of slaughter facility, such as pet food slaughter establishments, rendering establishments, local slaughtering facilities, and export establishments, indicate the percentage of the total number of animals slaughtered.
2. What records are kept at the various slaughter-facilities concerning the origin and numbers of livestock and poultry slaughtered?
3. What type of inspection is provided at each of the various slaughter-facilities? Indicate if no inspection is provided or if local, state, or national inspection is provided. For each type of inspection, what is the minimum required frequency of inspection?
4. What provisions are there to prevent a slaughter-facility that is required to have government inspection from slaughtering animals when government inspectors are not on duty? What legal authority do you have?

5. Which export-certified establishments slaughter or receive animal species or carcasses that are not approved for export from your country to the importing country or do not come from export-certified establishments? What procedures and record-keeping practices are in place to ensure that they cannot be included in product that is exported to the importing country? Indicate where the records are kept and how they are accessed?

E. Processing Facilities

1. What are the various types of processing facilities. Indicate whether the facility requires inspection and describe what type of inspection is required; such as local, state, or national inspection. What is the minimum required frequency of inspection for each type of facility?
2. What receiving and shipping procedures have been instituted to ensure that products designated for shipment to the United States do not include ineligible product? How is product eligibility and integrity maintained? How are transfer papers, truck seals, inventory records, and inspector presence (at loading and unloading) used to ensure that export shipments do not include ineligible product? Do inspection personnel have access to applicable establishment records?
3. What establishments, that are approved to export product to the United States, process product that is ineligible for export to the United States? For each establishment, describe the products that are ineligible.
4. What establishments, that are approved to export product to the United States, receive domestic product that is not eligible for export to the United States? For each establishment, describe the products that are received and not eligible for export?
5. What establishments, that are approved to export product to the United States, receive imported product that is not eligible for export to the United States? For each establishment, describe the products that are received and not eligible for export?
6. What establishments, that are approved to export product to the United States, receive domestic product that is eligible for export to the United States? For each establishment, describe the products that are received and eligible for export?
7. What establishments, that are approved to export product to the United States, receive imported product that is eligible for export to the United States? For each establishment, describe the products that are received and eligible for export?
8. What controls are in place to ensure that product moving between establishments, as well as product within establishments, is correctly marked as product eligible to be exported to the United States?

9. Are off-hour checks made to determine that processing establishments are not working without proper inspection?
10. Are inspections made of facilities that are not certified to export meat and/or poultry product to ensure that these products do not enter the export system? What controls are used to ensure that the inspection process is effective? For example, the controls may include the use of local stamps to identify local product, denaturing condemned product, or maintaining inventory records at pet food establishments.

#### F. Warehouse Facilities

1. What are the various types of warehouse facilities that are used for meat and/or poultry products? List the types of facilities separately, such as refrigerated, non-refrigerated, export, local, or other type of warehouse facility?
2. For each type of warehouse, what inspection coverage is provided or required? For example, is an inspector present whenever product enters or leaves the warehouse, or is an inspector present occasionally (at random) and/or on a fee basis? Who performs these inspections? If applicable, describe how the frequency of inspection is risk-based and based on previously recorded findings.
3. What records are kept of product movement between and within warehouse facilities? For example, does the warehouse keep inventory or transportation records? How do inspectors access or review these records?
4. What type of warehouse is required to be licensed? List each type of warehouse with the government agency that requires the licensing.
5. What types of product are kept in each warehouse? For example, is it export-product, local product, pet meats, orange juices, and/or vegetables? (Explain.)

#### G. Transportation Vehicles

1. What type of meat and/or poultry transporters or shippers are required to be licensed? For example, are meat or pet food transporters licensed? What government agencies oversee licensing?
2. What controls are in place to ensure that product being moved between facilities or outside the country maintains its original identity? For example, random checks, truck seals, and/or special labeling requirements may be used to ensure product integrity?
3. What temperature and product handling requirements apply to transported meat and/or poultry products during shipment?

4. What provisions are used to handle product from transportation vehicles that have been in an accident or are significantly damaged? For example, is the product returned to the establishment of origin and/or denatured at the site of accident?

#### H. Export Procedures

1. What procedures are used to obtain export certificates or other documents? Does the inspector that signs the documents see the product being certified?
2. What procedures are used to determine that the product being exported is eligible for shipment to the United States? For example, are the boxes labeled as product being exported to the United States or are special can-codes used? How is product traced back to the origin establishment?
3. What means of conveyance is used for exporting product? For example, are bulk shipments, individual container shipments, or air cargo used to convey product for export?
4. How does the government inspector verify that the product noted on the certificate, and other documents, matches the product being loaded for export?

#### I. Imported Meat

1. If meat or poultry is imported, what type of import inspection program do you have? Describe your import inspection program, including the specific measures used to substantiate product identity and inspection procedures. Does the program verify that tariffs or duties have been paid?
2. If imported meat or poultry is to be used in the United States product, how will the inspector know that the imported meat or poultry came from the United States certified establishments?
3. What records are kept concerning imported meats. For example, is the country of origin, establishment number, quantity, product type, and date of production recorded?

#### J. Pet, Zoo Animal, and Fur Feed Production:

1. What is the extent of the fur industry?
2. What is the source of feed for fur animals? For example, is the feed processed from imported product or from domestic product?
3. What controls, if any, are placed on the movement of fur feeds? Describe these controls in detail.

4. What is the source of food for carnivorous pets and zoo animals?
5. What controls are places over these feeds? Describe these controls in detail.
6. Where applicable, what controls are maintained on the production and handling of animal feeds in U.S.-certified establishments? Describe these controls as they apply to animals that are used for their fur, kept as pets, or confined in a zoo.
7. How are establishments required to denature or otherwise identify product that is not fit for human consumption? What authority is used to mandate this process?

K. General

1. What laws prevent your inspection system from certifying establishments as eligible to export product to the United States when it is known that the establishment is owned by someone convicted of a criminal act? Explain the authority that is mandated and the controls that are used.
2. Are all wages and expenses of inspection personnel paid by the national government? Who pays for overtime incurred by the inspector? If industry pays for the overtime, how is the money distributed to the government inspectors? For example, are the inspectors paid directly by the establishment or through the national government?
3. Who monitors product integrity when the product to be exported is not under the normal product controls established for the inspector? For example, what inspection staff monitors product during transportation, in warehouses, or when establishments are not working?
4. What authority do your inspectors have over export-product that is not within an officially inspected establishment? If product outside of official establishments is found to be ineligible for export, what action is taken? For example, does the inspector retain the product, destroy the product, or require it to be re-inspected?
5. Which agency in the national government investigates and prosecutes businesses, organizations, individuals, or inspection employees that are suspected of illegal activities?

6. What type of program do you have for testing product to ensure that the product content is limited to the animal species designated on the package or label? Describe the program in detail and address the following related questions:
  - a. How many samples are taken?
  - b. Who takes the samples?
  - c. Where are the samples taken?
  - d. What techniques are used in selecting and collecting the samples?
  - e. What laboratory support do you have for species testing? For example, where are the labs located, what methodology is used, and what is the source of the reagents? Describe the applicable program in detail.
  - f. How is the test information used? For example, is product held (not exported) until satisfactory results are received and recalled if found unsatisfactory? Describe the applicable process in detail.
7. How do you monitor the flow of product throughout the inspection system? What controls do you have in-place to ensure that your export inspection program is adequately implemented and maintained? Include a diagram of these activities.
8. Who supplies official brands, locks, seal and documents?
9. What controls are placed on official brands, locks, seals and documents?

L. Refused Entries

1. What records are kept of meat or poultry shipments that are refused entry into your country from other countries?
2. What control procedures are in place to prevent this product from being re-exported to the United States or mixed with other product being exported to the the United States?
3. What procedures are in place to trace product and monitor shipments that are refused entry into your country from other countries?

M. Control of Deceptive Labeling, Packaging, and Documentation

1. For each of the products under this application, what national and other government agencies enforce the relevant laws and regulations relating to the control of economic fraud? 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 the control of economic fraud?
4. What actions are taken when deceptive labeling, packaging, or invoicing practices are discovered? What program official is responsible for taking this action?
5. What official review and approval of meat and poultry product labels is required prior to their use in your country?
6. How do you ensure the accuracy of packaging and labeling materials, health certificates, invoices, and export documentation? Describe the process in detail.
7. What regulations, policies, guidelines, and other requirements pertain to the labeling and invoicing of products? Briefly describe the intent of each regulation, policy, guideline, and requirement.

N. Product Standards and Formulations

1. How do you ensure that products exported to the the United States meet the United States standards? For example, how do you control and verify the quantity and/or percent of meat/poultry, added water, fat, or microorganisms in a product?
2. What are the microbiologic standards, if any, for raw product and for meat and/or poultry products after thermal, or other, processing? How are these standards used as a measure of effective and safe processing?
3. What are the specific inspection-program responsibilities regarding the control of processed products?
4. Who develops processing procedures for individual establishments, and how are these procedures approved?
5. How can inspectors or visiting program officials readily determine that approved processing procedures are in use? For example, are processing activities, procedures, and observations documented and are they filed with the inspection official at the processing facility?
6. How are raw materials, formulations, yields, and product identification evaluated or controlled?

7. How do you control the use and storage of restricted ingredients? Describe the controls in detail.
8. What enforcement and regulatory actions are taken when manufacturers fail to comply with product standards or approved formulations? How is the product handled, controlled, and identified?

O. Sampling Program

1. What kinds of sampling or testing programs are in place to evaluate the occurrence of fraudulent practices?
2. What laboratory procedures are used by your inspection officials to determine compliance with product standards and formulations? What procedures are used to evaluate fraudulent practices? Identify the approved procedures and methods.
3. What additional reasons would you have, if any, for sampling product intended for export to the United States?
4. What is the significance or impact of laboratory findings in determining product acceptability?

P. Inspection Controls

1. What inspection or other procedures are used to ensure that meat and/or poultry products prepared for export to the United States meet the established criteria?
2. What is the frequency of supervisory visits to the slaughter or processing facility? What areas are reviewed and how are the findings reported? What follow-up procedures are in place?
3. In establishments that export to the United States, how do you ensure that establishments and specific areas of operation are adequately staffed with assigned inspectors? For example, how would you determine staffing needs based on an evaluation of facilities and operating practices?
4. What corrective and preventative actions do you take when unacceptable products intended for export to the United States are found?
5. What procedures are used to advise importers, custom officials, and/or inspection personnel that misbranded and/or adulterated products have been exported to your country? Who in your country is advised of this product and what initial and follow-up actions are required? What inspection controls ensure that this product does not enter consumer channels?

**Q. Salmonella Testing**

1. What are the laws, regulations, and official directives that mandate a pathogen reduction program that systematically seeks to reduce pathogenic microorganisms in raw meat and/or poultry? 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) include performance standards for appropriate target pathogens.
  - c) employ microbiological testing as an indicator of pathogenic microorganisms.
  
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 utilize available process control methods and technologies as necessary to achieve applicable pathogenic reduction performance standards.
  - b) the foreign inspection system takes effective enforcement action, including suspension and withdrawal of inspection of those establishments which fail to meet the pathogen reduction performance standards or which fail to take corrective actions based on the results of the foreign inspection system's microbiological testing program.

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