



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250



Dr. Miklos Suth, Chief Veterinary Officer
Ministry of Agriculture and Regional Development
Animal Health and Food Control Department
Kossuth ter 11
H-1055 Budapest
Hungary

Dear Dr. Suth :

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Hungary's meat inspection system April 1 through April 8, 2008. Comments from the government of Hungary have been included as an attachment to the final report. Enclosed is a copy of the final audit report. We apologize for the delay in the submission of this report

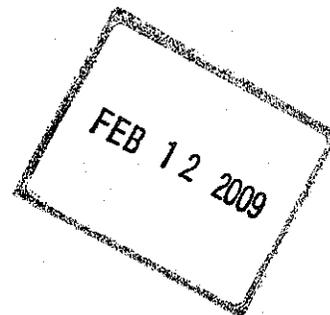
If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 205-3873, by facsimile at (202) 720-0676, or electronic mail at manzoor.chaudry@fsis.usda.gov.

Sincerely,

Manzoor Chaudry
Deputy Director
International Audit Staff
Office of International Affairs

Enclosure

U. S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
OFFICE OF INTERNATIONAL AFFAIRS
INTERNATIONAL AUDIT STAFF
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MEMORANDUM

TO: Quintin Gray, Minister Counselor
US Embassy, Vienna
A-1091 Wien Boltzmanngasse 16
Vienna, Austria

FROM: Manzoor Chaudry
Deputy Director
International Audit Staff, OIA, FSIS, USDA

SUBJECT: FSIS FINAL AUDIT REPORT FOR HUNGARY

Dear Mr. Gray,

Please deliver the attached final audit report to Dr. Miklos Suth, Chief Veterinary Officer, Ministry of Agriculture and Regional Development, Animal Health and Food Control Department. Please contact me via email at manzoor.chaudry@fsis.usda.gov, if you have any further questions.

Best regards,

W Don Carlson, acting Director

For Manzoor Chaudry

cc list:

Quintin Gray, Minister Counselor, US Embassy, Vienna
Mihaly Korintus, Agricultural Counselor, Embassy of Hungary
Debra Henke, Minister Counselor, US Mission to the EU, Brussels
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Yolande Mitchell, FCPS, OIA
Faiz Agarib, IES, OIA
Hungary Country File

FSIS:OIA:IAS:DIRECTOR:202-205-3873:HUNGARY
FINAL AUDIT LETTER February 12, 2009

**FINAL REPORT OF AN AUDIT CARRIED OUT IN HUNGARY
COVERING HUNGARY'S MEAT INSPECTION SYSTEM**

APRIL 1 THROUGH APRIL 22, 2008

**Food Safety and Inspection Service
United States Department of Agriculture**

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CAO	County Agricultural Office
CCA	Central Competent Authority, Department of Food Chain Control
<i>E. coli</i>	<i>Escherichia coli</i>
DFCC	Department of Food Chain Control, Central Competent Authority
FSIS	Food Safety and Inspection Service
FSO	Food Safety Office
MARD	Ministry of Agriculture and Rural Development
NAT	Hungarian National Accreditation Body
OVIC	Official Veterinarian-in-Charge
PR/HACCP	Pathogen Reduction / Hazard Analysis and Critical Control Point Systems
SPS	Sanitation Performance Standards
<i>Salmonella</i>	<i>Salmonella</i> species
SSOP	Sanitation Standard Operating Procedures
VEA	European Community/United States Veterinary Equivalence Agreement

1. INTRODUCTION

The audit took place in Hungary from April 1 through April 22, 2008.

An opening meeting was held on April 1, 2008, in Budapest, Hungary, with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Hungary's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the Food Chain Control (FCC), County Agricultural Office (CAO), and/or the Food Safety Office (FSO).

2. OBJECTIVE OF THE AUDIT

This was a routine audit. The objective of the audit was to evaluate Hungary's meat inspection system and 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 following sites were visited: the headquarters of the CCA, two county inspection offices, five establishment level inspection offices, three laboratories performing analytical testing on United States-destined product, two meat slaughter and processing establishments, two meat processing establishments, and one cold storage facility.

Competent Authority Visits			Comments
Competent Authority	Central	1	Budapest
	Regional	2	Baranya and Csongrad
	Local	5	Establishment level
Laboratories		3	
Meat Slaughter/Processing Establishments		2	
Meat Processing Establishments		2	
Cold Storage Facilities		1	

3. PROTOCOL

This 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 the country's inspection headquarters and two county offices. The third part involved on-site visits to five establishments: two swine slaughter and processing establishments, two processing establishments, and one cold storage facility. The fourth part involved visits to three government laboratories involved in applicable residue and microbiological testing.

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

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

At the opening meeting, the auditor explained that Hungary's meat inspection system would be audited against three standards: (1) EC Directives found to be equivalent per EU/US Veterinary Equivalence Agreement, (2) FSIS regulatory requirements, and (3) any equivalence determinations made for Hungary. FSIS requirements include, among other things, daily inspection in all certified establishments, periodic supervisory reviews to certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, species verification, and the requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella* species.

Equivalence determinations are those that have been made by FSIS for Hungary under provisions of the Sanitary/Phytosanitary Agreement. One equivalence determination has been made for Hungary: Samples for generic *E. coli* may be analyzed in government laboratories.

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.

In addition, compliance with the following European Community Directives was also assessed:

- Council Directive 64/433/EEC, of June 1964, entitled "Health Problems Affecting Intra-Community Trade in Fresh Meat"
- Council Directive 96/23/EC, April 29, 1996, entitled "Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Products"

- Council Directive 96/22/EC, April 29, 1996, entitled “Prohibition on the Use in Stock farming of Certain Substances Having a Hormonal or Thyrostatic Action of B-agonists”

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

The last two FSIS audits of Hungary were held September 7 through September 19, 2005 and May 22 through June 1, 2007.

The following finding was cited in the residue laboratory during the 2005 FSIS audit:

- The laboratory was holding samples for chloramphenicol testing because the ELISA screening kits were not available at the time of the audit. The holding time exceeded the three week turnaround time limit required by the laboratory program.

The following findings were reported during the 2007 FSIS audit:

- In one establishment, the written HACCP plan did not include all four parts of the corrective actions to be followed in response to a deviation from the critical limit.
- In another establishment, some of the cooking/cooling operations associated with the production of U.S. eligible fully-cooked ham were conducted outside of the official shift and without inspection supervision.

6. MAIN FINDINGS

6.1 Legislation

The auditor was informed that the relevant EC Directives, determined equivalent under the VEA, had been transposed into Hungary’s legislation.

6.2 Government Oversight

The Department of Food Chain Control (DFCC), a public administration body under the Ministry of Agriculture and Rural Development (MARD), is the Central Competent Authority (CCA). The Chief Veterinary Officer (CVO) is appointed by the Minister of Agriculture and serves as the Technical State Secretary since February 1, 2008. The CVO, is the most senior-level official for international affairs of the veterinary and food inspection activities. The Deputy President (DP) of the Central Agricultural Office is in charge of DFCC. The DFCC is the level of government that FSIS holds responsible for ensuring that FSIS regulatory requirements are implemented and enforced.

6.2.1 CCA Control Systems

Hungary's meat inspection system is organized in three levels: Central, county, and food safety offices.

The first level is the Central Agricultural Office in Budapest, which consists of one audit division and six directorates as follows:

- 1) Directorate for Food and Feed Safety
- 2) Directorate of Animal Health and Welfare
- 3) Directorate of Veterinary Medical Products
- 4) Directorate of Animal Health Diagnostics
- 5) Directorate for Plant, Soil, and Agricultural Environmental Protection
- 6) Directorate for Wine Grading

The Directorate for Food and Feed Safety (DFFS) is divided into four departments as follows:

- 1) Department for Food Safety and Food Hygiene
- 2) Department for Food Distribution Safety
- 3) Department for Coordination of Regional Laboratories
- 4) Department for Feed Safety and Feed Quality Control

The Department for Food Safety and Food Hygiene (DFSFH) is responsible for:

- Oversight of the approved establishments for export to the third countries, including the approval and supervision of certified establishments for export to the United States.
- Testing the hygienic suitability of equipment used in the food industry
- Supervision of the County Agricultural Offices or County Competent Authorities in relation to the activities of approved establishments
- Training of the official veterinarians and auxiliaries

The second level encompasses 19 County Agricultural Offices (CAO) that have control over the meat-processing establishments within their jurisdiction. Three of these counties (Csongrad, Baranya, and Veszprem) contain the U.S. certified establishments. Each CAO has a Director for Food Chain Safety and Animal Health who has overall responsibility in the county. There is also a Food Hygiene Specialist (FHS) in each county who performs the required periodic supervisory reviews of the establishments certified for U.S. export.

The Food Safety Offices (FSO) located in each of the U.S. certified establishments form the third level. Each office has an Official Veterinarian-in-Charge (OVIC) who is in charge of inspection activities in the establishment and receives direction from the CAO. The OVIC has direct supervision over all other inspection personnel assigned to the certified establishment, including associate veterinary officers and non-veterinary inspection (meat inspectors) personnel.

6.2.2 Ultimate Control and Supervision

The DFCC of MARD has ultimate control over the slaughtering of livestock and production of food products derived from animals.

The CAO and the OVIC oversee the maintenance of eligibility to export to the United States. These supervisors have the authority, under Hungary's regulations, to enforce the necessary requirements to export to another country. Their duties also include initiating investigations into failure on the part of an establishment to meet the standards of the importing country and to delist those establishments that fail in this requirement.

The OVIC in certified establishments performs the daily supervision of establishment activities. The OVIC reports directly to the FHS who performs the periodic supervisory reviews. In addition to the periodic supervisory reviews, the CCA usually performs semi-annual audits of the U.S.-certified establishments if significant non-compliances are identified either by periodic supervisory reviews or by FSIS auditors.

All inspection personnel assigned to the establishments certified to export meat to the United States are full-time government employees receiving no remuneration from either industry groups or establishment personnel.

6.2.3 Assignment of Competent, Qualified Inspectors

Each CAO is responsible for the selection, hiring, and training of inspection personnel within their jurisdiction. Veterinarians receive specialized training related to food hygiene during their veterinary education. They also gain additional knowledge and experience through periodic MARD and CAO training sessions. The meat inspectors are technical school graduates. They only perform post-mortem-related inspection activities. Each FHS and OVIC who attends MARD training sessions is expected to pass on this training to the other veterinarians in his/her county, including the other official veterinarians and meat inspectors in exporting establishments.

The OVIC has the authority to stop the establishment's production operations any time the wholesomeness and/or safety of the product is jeopardized. He/she reports directly to the FHS and consults with him/her regarding all decisions involving enforcement activities. The decision as to whether the establishment is failing to meet the U.S. import requirements and the recommendation that it should be delisted is a combined effort of the OVIC, FHS, and county director, and may also include headquarters officials.

6.2.4 Authority and Responsibility to Enforce the Laws

The DFCC has the legal authority and the responsibility to enforce all FSIS requirements. The OVIC and other qualified in-plant inspection personnel are authorized to enforce European Commission (EC) legislation and U.S. import requirements. The CAO, with the assistance of its legal department and headquarters office, has the legal authority to suspend and/or delist the U.S. certified establishments to prevent the export of unwholesome products to the United States.

6.2.5 Adequate Administrative and Technical Support

The CCA has the resources and ability to support a third-party audit and has adequate administrative and technical support to operate Hungary's meat inspection system.

Administration, development, coordination, and the formation of rules and regulations take place in the headquarters of the MARD in Budapest, Hungary.

6.3 Headquarters and County Agricultural Office Audit

The auditor conducted a review of inspection system documents at the headquarters of the DFCC/MARD located in Budapest. The auditor also interviewed inspection officials in Baranya and Csongrad County Agricultural Offices for the purpose of determining the level of government oversight, supervisory structure, and to review records pertinent to the U.S. certified establishments. The records review focused primarily on food safety hazards and included the following:

- Government oversight documents, including organizational structure
- Periodic supervisory visits
- Training programs and personnel records of training
- Requirements for employment and payment records of inspection personnel
- New laws and implementation documents such as regulations, notices, directives and guidelines
- Assignment of inspectors, staffing, and inspection coverage of the U.S. certified establishment
- Inspection records and enforcement actions such as withholding, suspending, or withdrawing inspection services from or delisting an establishment that is certified to export product to the United States
- Organization of the country's laboratory system
- Microbiology and residue sampling and laboratory analyses
- Export product inspection and control including export certificates
- Sanitation, slaughter and processing inspection procedures and standards
- Control of inedible and condemned materials
- Funding of Hungary's inspection program
- The food security/defense system

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

7. ESTABLISHMENT AUDITS

The FSIS auditor reviewed two swine slaughter and processing establishments, two processing establishments, and one cold storage facility. Specific deficiencies are noted on the attached individual establishment reports.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

The Department of Coordination for Regional Laboratories in Budapest supervises one National Central Laboratory and five regional laboratories. The National Central Laboratory consists of the following reference laboratories:

- 1) Central Microbiology Laboratory
- 2) Central Residue/Toxicology Laboratory
- 3) Central Analytical laboratory
- 4) Central Radio-Analytical Laboratory
- 5) Central Feed Investigation Laboratory

The following laboratories were audited:

1. The Central Residue/Toxicology Laboratory located in Budapest. This is a government laboratory that conducts analyses of field samples for Hungary's national residue program.

The following findings were noted:

- The temperatures of incoming meat samples were not measured or documented as written in the quality control manual.
 - Official standards book for preparation of stock solution did not contain the following information:
 - The signature and date of verification by the responsible supervisor.
 - The incorrect entries were corrected and signed but not dated by the person making the correction.
2. Veszprem County Complex Laboratory located in Veszprem. This is a government laboratory that conducts microbiology testing of official DFCC samples.
3. Kecskemet County Complex Laboratory located in Kecskemet. This is a government laboratory that conducts microbiology testing of official DFCC samples.

No deficiencies were noted in either Veszprem or Kecskemet County Laboratories..

All three laboratories were ISO 17025-certified by the Hungarian Accreditation Body (NAT).

9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focuses on five areas of risk to assess Hungary's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of the establishments, Hungary'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, Hungary's inspection system had controls in place for light, plumbing and sewage, water potability records, chlorination procedures, back-siphonage prevention, dressing rooms/lavatories, separation of operations, temperature control, workspace, ventilation, ante-mortem facilities, condemned product control, welfare facilities, and outside premises.

9.1 Sanitation Standard Operating Procedures (SSOP)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States' domestic inspection program.

The SSOP in the five establishments audited were found to meet the basic FSIS regulatory requirements with the following exceptions:

- In one establishment, several swine carcasses in one cooler were observed with multiple dark flakes of unidentified foreign material on their front legs.
- In two establishments, condensate from the overhead structures was observed dripping onto exposed swine carcasses in the coolers.

The Sanitation Performance Standards (SPS) in the five establishments audited were found to meet FSIS regulatory requirements with the following exceptions:

- In one establishment, a number of small holes were observed in the ceiling above exposed products and food contact surfaces in the ham stuffing room.
- In another establishment, the following non-compliances were observed during pre-operational inspection verification:
 - A) Three stainless steel product holding trays which had been cleaned and were ready for use had pieces of fat and meat product residues from previous day's operation.
 - B) A build-up of white color chemical material was observed in the bottom of a horizontal injection molding machine and below the auger's axis of rotation in the salami stuffing room.

9.2 EC Directive 64/433

In all establishments, the provisions of EC Directive 64/433 were effectively implemented.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, humane handling and humane slaughter, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Hungary's inspection system had adequate controls in place.

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 auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: Ante-mortem inspection procedures; ante-mortem disposition; post-mortem inspection procedures; post-mortem disposition; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls for cured, dried, and cooked products. The controls also include the implementation of HACCP systems and a testing program for generic *E. coli* in this establishment.

11.1 Humane Handling and 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 a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP program was reviewed during the audit of four establishments. All four establishments had adequately implemented the HACCP requirements, except as noted below:

- In one establishment:
 - A) The results of verification procedures were not recorded in the daily records documenting ongoing verification activities.
 - B) Monitoring records for CCP1 (product temperature) did not include the initials by the responsible establishment employee(s) making the entries.

- C) Calibration of process-monitoring instrument records did not include the times when the specific events occurred.
- D) Pre-shipment review records did not include the review of all critical control points associated with the production of the U.S. eligible products.

- In another establishment:
 - A) Returned product was not included in the flow chart as a processing step and food safety hazards for this processing step were not identified in the hazard analysis.
 - B) The results of verification procedures were not recorded in the daily records documenting ongoing verification activities.
 - C) Monitoring records for CCP1 (product temperature) did not include the times of observations or the initials by the responsible establishment employee(s) making the entries.
 - D) Calibration of process-monitoring instrument records did not include the times when specific events occurred.

11.3 Testing for Generic *Escherichia coli*

Hungary has adopted the FSIS regulatory requirements for generic *E. coli* testing with the exception of the following equivalent alternative procedure:

- Government laboratories perform generic *E. coli* testing.

Two establishments were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in both slaughter establishments.

11.4 Testing for *Listeria monocytogenes*

Three establishments were producing ready-to-eat products for export to the United States. In accordance with United States requirements, the HACCP plans in these establishments had been reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to occur. No deficiencies were observed.

11.5 EC Directive 64/433

In all establishments, the provisions of EC Directive 64/433 were effectively implemented.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor 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 Central Residue/Toxicology Laboratory in Budapest is the reference laboratory for residues. It conducts analyses of field samples for Hungary's national residue program.

12.1 EC Directive 96/22

In the National Central Laboratory for Residues, the provisions of EC Directive 96/22 were effectively implemented.

12.2 EC Directive 96/23

In the National Central Laboratory for Residues, the provisions of EC Directive 96/23 were effectively implemented.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella* species. No deficiencies were observed.

13.1 Daily Inspection

Inspection was being conducted daily in five certified establishments.

13.2 Testing for *Salmonella* species

Hungary has adopted the FSIS requirements for testing for *Salmonella* species. Two slaughter establishments were required to meet the basic FSIS regulatory requirements for testing for *Salmonella* species and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* species was properly conducted in both establishments.

13.3 Species Verification

Species verification was in compliance with FSIS requirements.

13.4 Periodic Supervisory Reviews

Periodic supervisory reviews 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.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other countries for further processing.

Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on April 22, 2008, in Budapest, Hungary, with the CCA. At this meeting, the preliminary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. Nader Memarian
Senior Program Auditor

A handwritten signature in black ink, appearing to read "Nader Memarian", with a stylized flourish at the end. To the right of the signature, the letters "DMM" are written in a similar style.

15. ATTACHMENTS

Individual Foreign Establishment Audit Forms
Foreign Country Response to Draft Final Audit Report

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Papai Hus Papa	2. AUDIT DATE 04/03/2008	3. ESTABLISHMENT NO. 6	4. NAME OF COUNTRY Hungary
5. NAME OF AUDITOR(S) Nader Memarian, DVM		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.

	Audit Results		Audit Results
Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements		Part D - Continued Economic Sampling	
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	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X	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	X
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	
23. Labeling - Product Standards		51. Enforcement	X
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	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Periodic Supervisory Reviews	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 04/03/2008 Est #: 6 (Papai Hus. [S/P/CS]) (Papa, Hungary)

10 The following non-compliances were observed in one of the swine carcass coolers:

A) Condensate from the overhead structures was observed dripping onto exposed swine carcasses. {Regulatory reference: 9CFR 416.13}

B) Several swine carcasses were observed with multiple dark flakes of unidentified foreign material on their front legs. {9 CFR 416.13}

39/51 A number of small holes were observed in the ceiling above exposed products and food contact surfaces in the ham stuffing room. {9CFR 416.4 and 416.17}

Immediate corrective actions for above deficiencies were ordered by inspection personnel.

61. NAME OF AUDITOR
Dr. Nader Memarian

62. AUDITOR SIGNATURE AND DATE

4-3-08


United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Pick Szeged Szeged	2. AUDIT DATE 04/15/2008	3. ESTABLISHMENT NO. 7	4. NAME OF COUNTRY Hungary
5. NAME OF AUDITOR(S) Nader Memarian, DVM		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)	Audit Results	Part D - Continued Economic Sampling	Audit Results
Basic Requirements			
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	
Sanitation Standard Operating Procedures (SSOP)		Part E - Other Requirements	
Ongoing Requirements			
10. Implementation of SSOP's, including monitoring of implementation.	X	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	X
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	
23. Labeling - Product Standards		51. Enforcement	X
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	
Part D - Sampling		55. Post Mortem Inspection	
Generic E. coli Testing		Part G - Other Regulatory Oversight Requirements	
27. Written Procedures		56. European Community Directives	
28. Sample Collection/Analysis		57. Periodic Supervisory Reviews	
29. Records		58.	
Salmonella Performance Standards - Basic Requirements		59.	
30. Corrective Actions			
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 04/15/2008 Est #: 7 (Pick Szeged [S/P/CS]) (Szeged, Hungary)

10 Condensate from the overhead structures was observed dripping onto exposed carcasses in the main hallway between two coolers. {Regulatory reference: 9CFR 416.13}

45/51 The following non-compliances were observed during pre-operational inspection verification:

A) Three stainless steel product holding trays which had been cleaned and were ready for use had pieces of fat and meat product residues from previous day's operation. {CFR416.3 (a) and 416.17}

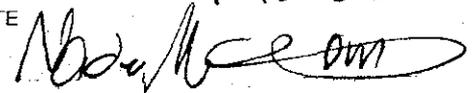
B) A build-up of white color chemical material was observed in the bottom of a horizontal injection molding machine and below the auger's axis of rotation in the salami stuffing room. {CFR416.3 (a) and 416.17}

Immediate corrective actions for above deficiencies were ordered by inspection personnel.

61. NAME OF AUDITOR

Dr. Nader Memarian

62. AUDITOR SIGNATURE AND DATE

4-15-08


United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Pick Szeged Pecs	2. AUDIT DATE 04/09/2008	3. ESTABLISHMENT NO. 22	4. NAME OF COUNTRY Hungary
	5. NAME OF AUDITOR(S) Nader Memarian, DVM	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)		Audit Results	Part D - Continued Economic Sampling	Audit Results
Basic Requirements			33. Scheduled Sample	
7. Written SSOP			34. Species Testing	
8. Records documenting implementation.			35. Residue	
9. Signed and dated SSOP, by on-site or overall authority.			Part E - Other Requirements	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			36. Export	
10. Implementation of SSOP's, including monitoring of implementation.			37. Import	
11. Maintenance and evaluation of the effectiveness of SSOP's.			38. Establishment Grounds and Pest Control	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.			39. Establishment Construction/Maintenance	
13. Daily records document item 10, 11 and 12 above.			40. Light	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			41. Ventilation	
14. Developed and implemented a written HACCP plan.			42. Plumbing and Sewage	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.			43. Water Supply	
16. Records documenting implementation and monitoring of the HACCP plan.			44. Dressing Rooms/Lavatories	
17. The HACCP plan is signed and dated by the responsible establishment individual.			45. Equipment and Utensils	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			46. Sanitary Operations	
18. Monitoring of HACCP plan.			47. Employee Hygiene	
19. Verification and validation of HACCP plan.			48. Condemned Product Control	
20. Corrective action written in HACCP plan.			Part F - Inspection Requirements	
21. Reassessed adequacy of the HACCP plan.			49. Government Staffing	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		X	50. Daily Inspection Coverage	
Part C - Economic / Wholesomeness			51. Enforcement	X
23. Labeling - Product Standards			52. Humane Handling	O
24. Labeling - Net Weights			53. Animal Identification	
25. General Labeling			54. Ante Mortem Inspection	O
26. Fin. Prod. Standards/Boneless (Defects/AQU/Pork Skins/Moisture)			55. Post Mortem Inspection	O
Part D - Sampling Generic E. coli Testing			Part G - Other Regulatory Oversight Requirements	
27. Written Procedures		O	56. European Community Directives	
28. Sample Collection/Analysis		O	57. Periodic Supervisory Reviews	
29. Records		O	58.	
Salmonella Performance Standards - Basic Requirements			59.	
30. Corrective Actions		O		
31. Reassessment		O		
32. Written Assurance		O		

60. Observation of the Establishment

Date: 04/09/2008 Est #: 22 (Pick Szeged [P/CS]) (Pecs, Hungary)

- 22/51 A) The results of verification procedures were not recorded in the daily records documenting ongoing verification activities. {Regulatory reference: 9CFR part 417.5 (a) (3) and 417.8}
- B) Monitoring records for CCP1 (product temperature) did not include the initials by the responsible establishment employee(s) making the entries. {9CFR part 417.5(b) and 417.8}
- C) Calibration of process-monitoring instruments records did not include the times when the specific events occurred. {9CFR part 417.5(b) and 417.8}
- D) Pre-shipment review records did not include the review of all critical control points associated with the production of the U.S. eligible products. {9CFR part 417.5(c) and 417.8}

The auditor was assured by the inspection officials and/or establishment personnel that all deficiencies found in this audit would be scheduled for correction.

61. NAME OF AUDITOR
Dr. Nader Memarian

62. AUDITOR SIGNATURE AND DATE

4-9-08


United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Pick Szeged Pecs	2. AUDIT DATE 04/07/2008	3. ESTABLISHMENT NO. 553	4. NAME OF COUNTRY Hungary
5. NAME OF AUDITOR(S) Nader Mcmarian, DVM		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	()
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	
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	()
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	()
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	
29. Records	O	57. Periodic Supervisory Reviews	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

Date: 04/07/2008 Est #: 553 (Pick Szeged [CS]) (Pecs, Hungary)

There were no significant findings to report after consideration of the nature, degree, and extent of all observations.

61. NAME OF AUDITOR

Dr. Nader Memarian

62. AUDITOR SIGNATURE AND DATE

4-7-08
Nader Memarian

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Pick Szeged Alsomocsolad	2. AUDIT DATE 04/10/2008	3. ESTABLISHMENT NO. 86	4. NAME OF COUNTRY Hungary
5. NAME OF AUDITOR(S) Nader Memarian, DVM		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	
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.		X	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.		X	49. Government Staffing	
Part C - Economic / Wholesomeness			50. Daily Inspection Coverage	
23. Labeling - Product Standards			51. Enforcement	X
24. Labeling - Net Weights			52. Humane Handling	O
25. General Labeling			53. Animal Identification	
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	
29. Records		O	57. Periodic Supervisory Reviews	
Salmonella Performance Standards - Basic Requirements			58.	
30. Corrective Actions		O	59.	
31. Reassessment		O		
32. Written Assurance		O		

60. Observation of the Establishment

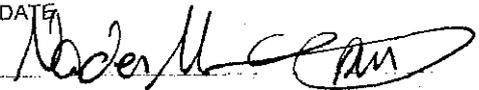
Date: 04/10/2008 Est #: 86 (Pick Szeged [P/CSI]) (Alsomocsolad, Hungary)

- 15/51 Returned product was not included in the flow chart as a processing step and food safety hazards for this processing step were not identified in the hazard analysis. {Regulatory reference: 9CFR 417.2 (a) (2) and (c) (1) and 9CFR 417.8}
- 22/51 A) The results of verification procedures were not recorded in the daily records documenting ongoing verification activities. {9CFR part 417.5 (a) (3) and 417.8}
- B) Monitoring records for CCPI (product temperature) did not include the times of observations or the initials of the responsible establishment employee(s) making entries. {9CFR part 417.5(b) and 417.8}
- C) Calibration of process-monitoring instruments records did not include the times when the specific events occurred. {9CFR part 417.5(b) and 417.8}

The auditor was assured by the inspection officials and/or establishment personnel that all deficiencies found in this audit would be scheduled for correction.

61. NAME OF AUDITOR
Dr. Nader Memarian

62. AUDITOR SIGNATURE AND DATE

4-10-08




MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT
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31420 / 12008

Budapest, 22 September 2008

Donald Smart
Director

United States Department of Agriculture
Food Safety and Inspection Service
International Audit Staff
Office of International Affairs

20250
Washington D.C.

Fax: 001 202 720 0676

*Subject: Comments on report of FSIS audit of Hungary's meat
inspection system (April 1-22, 2008)*

Dear Mr. Smart,

With reference to the audit carried out by FSIS between 1 and 22 of April, 2008 to evaluate Hungary's meat inspection system, please find below a list of corrective actions taken by the competent authorities and the establishments to rectify the deficiencies that were identified during the on-site visits.

Establishment HU 7 (Pick Szeged Zrt.)

Condensate from the overhead structures was observed dripping onto exposed carcasses in the main hallway between two coolers.

The mentioned structure is a chiller unit situated above the overhead rail. With the involvement of external experts, the company has begun the review of the ventilation and chilling system from the entrance of the blast chiller all the way to the pre-chillers.

The county veterinary directorate advised the company to use cleaner machines instead of the current hose-pipe system.

Three stainless steel product holding trays which had been cleaned and were

ready for use had pieces of fat and meat product residues from previous day's operation.

The tray washing method has been improved and staffing levels increased. Operational checks to verify the cleanliness of de-frost trays has been built into the self-check system of the plant.

Since the audit, no such deficiency was found during pre-operational or operational SSOP inspections performed either by plant staff or officials.

A build-up of white color chemical material was observed in the bottom of a horizontal injection molding machine and below the auger's axis of rotation in the salami stuffing room.

The cleaning staff, their supervisors and the person responsible for quality control at the plant have received extra training.

Following the training, no such deficiency was found during pre-operational or operational SSOP inspections performed either by plant staff or officials.

Establishment HU 6 (Pápai Hús Rt.)

Condensate from the overhead structures was observed dripping onto exposed swine carcasses.

The source of the problem was the breakdown of the ventilator unit. It has been mended.

Several swine carcasses were observed with multiple dark flakes of unidentified foreign material on their front legs.

The source of the contamination was the broken sprocket-wheel in the blast chiller. It has been replaced.

A number of small holes were observed in the ceiling above exposed products and food contact surfaces in the ham stuffing room.

The ceiling has been mended.

On April 10, 2008 the competent authority has verified the above corrective actions taken by the plant.

Establishments HU 22 (Pick Szeged Zrt. - Pécs) and HU 86 (Pick Szeged Zrt. - Alsómocsolád)

The observations at these establishments are related mostly to the self-check systems of the plants. The county veterinary directorate has strengthened controls relevant to the points mentioned in the audit report. Following the audit, a training has been organised for the official veterinarians and district chief veterinarians with the aim of ensuring more accurate and thorough inspections in the future.

With regard to other findings mentioned in the report, we accept the auditors' observations and do not wish to make any further comments.

Yours sincerely,




Miklós Süth DVM
Chief Veterinary Officer