



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, DC
20250

NOV 01 2012

Dr. Janusz Zwiazek
Chief Veterinary Officer
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Dear Dr. Zwiazek:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Poland's meat inspection system May 10 through June 1, 2011. Your comments to the audit report have been included in the report. Enclosed is a copy of the final audit report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 720-6400, by facsimile at (202) 720-7990, or electronic mail at internationalaudit@fsis.usda.gov.

Respectfully,

A handwritten signature in blue ink, appearing to read "Shaukat H. Syed".

Dr. Shaukat H. Syed
Director
International Audit Staff
Office of International Affairs

Enclosure

NOV 01 2012

**FINAL REPORT OF AN AUDIT CONDUCTED IN
POLAND**

MAY 10 – JUNE 1, 2011

**EVALUATING THE FOOD SAFETY SYSTEMS GOVERNING
THE PRODUCTION OF MEAT
PRODUCTS INTENDED FOR EXPORT TO
THE UNITED STATES OF AMERICA**

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

Executive Summary

This audit report describes the outcome of an on-site routine ongoing equivalence verification audit conducted by the Food Safety and Inspection Service (FSIS) from May 10 through June 1, 2011 to verify Poland's food safety system governing red meat slaughter and processing is equivalent to that of the United States (U.S.), with the ability to produce products which are safe, wholesome, unadulterated, and properly labeled. This audit was conducted concurrently with an initial equivalence audit of Poland's poultry inspection system, for which the observed findings are included in a separate report. Representatives from Poland's General Veterinary Inspectorate (GVI) offices accompanied the FSIS auditors throughout the entire audit.

The focus of the audit was on the ability of the Central Competent Authority (CCA), the GVI, to regulate red meat production. FSIS reviewed and verified the information provided by the CCA through the completed Self Reporting Tool (SRT).

The audit scope included three red meat slaughter/processing establishments, fourteen government offices, including the CCA, and four laboratories conducting microbiological and chemical residue testing. Determinations concerning the effectiveness of Poland's food safety program focused on performance within the following six components upon which system equivalence is based: (1) Government Oversight, (2) Statutory Authority and Food Safety Regulations, (3) Sanitation, (4) Hazard Analysis and Critical Control Point Systems, (5) Chemical Residue Control Programs, and (6) Microbiological Testing Programs. The auditors concluded that the CCA was able to meet the principal requirements for the following equivalence components: (1) Government Oversight, (2) Statutory Authority and Food Safety Regulations, (5) Chemical Residue Control Programs and (6) Microbiological Testing Programs.

Findings of systemic impact were identified within the equivalence components for (3) Sanitation, and (4) Hazard Analysis and Critical Control Point (HACCP):

There was inconsistency in the enforcement of corrective action requirements in response to non-compliances. In some instances, the administrative decisions issued according to the established procedure were not closed out accordingly. The administrative decisions ought to be close out to indicate that corrective actions were complete, verified and deemed acceptable by inspection. The inspection system relies on familiarity of the supervisors with the inspection personnel's knowledge of relevant requirements when staffing establishments that produce poultry products destined for the United States. The inspection system was not able to produce records documenting completion of ongoing training at all levels of the inspection system. The periodic supervisory reviews, as conducted, do not assess, identify or document the knowledge or training needs of inspection personnel with respect to specific inspection program requirements.

The inspection system was conducting daily activities to ensure the execution of HACCP and SSOP. The CCA, however, was lacking current policy or regulations that specifically require establishments to develop and implement written SSOP and describe how to implement HACCP plans as condition for gaining certification for export of poultry products to the United States.

Poland did not inform the FSIS or request equivalence determination for its current use of private laboratories to analyze official microbiological samples of product destined for the United States.

In order to maintain an equivalent inspection system, the CCA has to submit a comprehensive corrective action plan addressing the specific audit findings outlined in the report for each component. FSIS will evaluate the extent to which the proffered corrective actions sufficiently address the systemic findings identified. Provided the corrective actions are sufficient, FSIS will verify the adequacy of corrective actions through requesting documentation during the ongoing verification process and/or an additional on-site audit.

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ABBREVIATIONS AND SPECIAL TERMS U.S.ED IN THE REPORT

CCA	Central Competent Authority (General Veterinary Inspectorate)
CFR	Code of Federal Regulation
CVO	Chief Veterinary Officer
DCVO	Deputy Chief Veterinary Officer
DVI	District Veterinary Inspectorate
DVO	District Veterinary Officer
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
GVI	General Veterinary Inspectorate
<i>Lm</i>	<i>Listeria monocytogenes</i>
MARD	Ministry of Agriculture and Rural Development
NRCP	National Residue Control Plan
NRL	National Reference Laboratory
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point System
POE	Port-of- Entry
PT	Proficiency testing
PVI/RVI	Provincial/Regional Veterinary Inspectorate
PVL/RVL	Provincial/Regional Veterinary Laboratory
PVO	Provincial Veterinary Officer
RTE	Ready – to - Eat
<i>Salmonella</i>	<i>Salmonella</i> species
SPS	Sanitation Performance Standards
SRT	Self Reporting Tool
SSOP	Sanitation Standard Operating Procedures

VEA

European Community/United States Veterinary Equivalence Agreement

1. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture conducted an on-site audit of Poland's meat inspection system from May 10 through June 1, 2011. This audit was conducted simultaneously with a FSIS on-site initial equivalence audit of Poland's poultry inspection system. The observed findings of the poultry inspection system are included in a separate report.

The audit began with an entrance meeting held on May 10, 2011 in Warsaw with the participation of representatives from the Central Competent Authority (CCA)-Poland's General Veterinary Inspectorate (GVI) of the Ministry of Agriculture and Rural Development (MARD), representatives from the United States Embassy in Poland, and the FSIS audit team.

2. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

The audit objective was to verify Poland's food safety system governing meat and meat product continues to be equivalent to that of the United States (U.S.), with the ability to produce products, which are safe, wholesome, unadulterated, and properly labeled. In addition, FSIS' objective of the audit was to evaluate the performance of the CCA with respect to controls over establishments certified by the CCA as eligible to export meat and meat products to the United States and laboratories certified to analyze residue and microbiology samples from these establishments.

In pursuit of this objective and prior to the on-site audit, FSIS used the information provided by Poland in the FSIS document entitled Self Reporting Tool (SRT) for On-going Equivalence, as well as port-of-entry (POE) testing results, and data collected by FSIS during on-site audits conducted in the last three years. The SRT documents provide a comprehensive overview of all relevant legislation and procedures supporting the meat inspection system.

The FSIS auditors were accompanied throughout the audit by representatives from the CCA that included GVI, Provincial Veterinary Inspectorate (PVI)/Regional Veterinary Inspectorate (RVI) and District Veterinary Inspectorate (DVI) officials. Determinations concerning program effectiveness focused on performance within the following six equivalence components upon which system equivalence is based: (1) Government oversight, (2) Statutory authority and food safety regulations, (3) Sanitation, (4) Hazard Analysis and Critical Control Point Systems, (5) Chemical residues control programs, and (6) Microbiological testing programs.

The evaluation of all components included an analysis of information provided by the CCA in the SRT, interviews with government and industry officials, and observations gathered during the on-site audit of the system.

Administrative functions were reviewed at the CCA headquarters in Warsaw, at five provincial, five districts, and three local inspection offices, during which the auditor evaluated the implementation of those management control systems in place, which ensure that the national system of inspection, verification and enforcement was being implemented as intended.

In order to verify the CCA's ability to provide consistent government oversight, a sample of three establishments was selected by FSIS from a total of 10 establishments certified to export meat products to the United States. During the establishment visits, particular attention was paid to the extent to which industry and government interact to control hazards and prevent non-compliances that threaten food safety, with an emphasis on the CCA's ability to provide oversight through supervisory reviews conducted in accordance with 9 CFR 327.2.

Poland is eligible to export fresh and processed pork products slaughtered in U.S. certified establishments based on the meat equivalence determination.

Poland is affected with Bovine Spongiform Encephalopathy (BSE).

Additionally, four government laboratories conducting microbiological and chemical residue testing were audited to verify its ability to provide adequate technical support to the inspection system.

Competent Authority Visits		#	Locations
Competent Authority	Central	1	Warsaw
	Province	5	Lublin, Kielce, Gdansk, Poznan, and Szczecin.
	District	5	Lukow, Starachowice, Gdyna, Ostrzeszow, and Szczecin,
Laboratories (microbiological and residue testing)		4	National Reference Laboratory (NRL)/National Veterinary Institute (NVI) (Pulawy) Provincial Veterinary Laboratory (Gdansk) Provincial Veterinary Laboratory (Warsaw) Provincial Veterinary Laboratory (Kielce)
Establishments		3	Lukow, (Porcine Slaughter/Processing) Starachowice (Porcine Slaughter/Processing) Szczecin (Porcine Slaughter/Processing)

3. LEGAL BASIS FOR THE AUDIT AND AUDIT STANDARDS

The audit was undertaken under the specific provisions of United States' laws and regulations, in particular:

- The Federal Meat Inspection Act (21 USC. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

The audit standards included all applicable legislation and procedures originally determined equivalent by FSIS as part of the initial review process, and any subsequent equivalence determinations that have been made by FSIS under provisions of the Sanitary/Phytosanitary Agreement (SPS).

- All applicable legislation originally determined equivalent by FSIS as part of the initial review or the on-going equivalence verification review processes.
- Any equivalence determinations that have been made by FSIS under provisions of the European Commission/United States Veterinary Equivalence Agreement (VEA).

Currently, Poland has equivalence determinations in place for the following analytical methods:

- The use of ISO 11290-1, microbiology testing method for *Listeria monocytogenes* (*Lm*) in ready-to-eat (RTE) products.
- The use of ISO 11290-2, microbiology testing method for *Lm* in RTE products as confirmatory and enumeration method only when used in conjunction with ISO 11290-1.
- The use of ISO 6579:2002 microbiology testing for *Salmonella* in
 - Raw meat products
 - Swine carcasses sponge
 - RTE products (325 g)

4. BACKGROUND

Poland is eligible to export meat to the United States. Between 12/2009 and 12/2010, Poland exported 21, 278, 398 pounds of pork meat products to the United States of which 1,592 pounds were rejected for minor violations, such as transportation damage at U.S. POE.

The last audit conducted by FSIS of Poland's meat inspections system was conducted in 2009. Reported findings from that audit have been corrected, verified and documented by the pertinent sectors of the system. The FSIS auditor confirmed that the corrective actions taken (species testing) had been assessed for adequacy by the CCA.

The FSIS final audit reports for Poland's Food Safety System are available on the FSIS' website at:

[http://www.fsis.usda.gov/Regulations & Policies/Foreign Audit Reports/index.asp](http://www.fsis.usda.gov/Regulations%20&%20Policies/Foreign%20Audit%20Reports/index.asp)

5. GOVERNMENT OVERSIGHT

The first of the six equivalence components of the red meat inspection system of Poland that FSIS reviewed was Government Oversight. The evaluation included a review and analysis of documentation submitted as support for the responses provided by the CCA in the SRT and observations gathered during the onsite audit.

The FSIS auditor verified, by interviewing government officials, and reviewing inspection records, such as daily inspection reports, periodic control reports, sampling and oversight reports, that the inspection system is organized and administered by the national government and it provides standards equivalent to those of the Federal system of the red meat inspection in the United States.

The FSIS auditor assessed the extent to which the Poland's meat slaughter and processing inspection system is organized and administered by the government of Poland and confirmed that the GVI has the first level authority to administer the meat inspection system for export. Consequently, GVI serves as the CCA responsible for the safety of food products, promulgation of regulations on food inspection, and has sole authority to enforce the laws and regulations of the export system.

The FSIS auditor verified the organizational structure of MARD. The GVI is the CCA of the Polish meat inspection service with the office of the Chief Veterinary Officer (CVO) in Warsaw. The GVI has oversight over the second level, the PVI and the third level, the DVI. In addition, the auditor assessed the manner through which the MARD interacts with the CCA to maintain appropriate regulation of the production of meat products for export.

The primary laws for the regulation of meat inspection in Poland are: the Act on Veterinary Inspection; the Act on Safety of Food and Nutrition; and the Act on the health condition of food and nutrition. These acts provide the operational and regulatory authority to carry out Poland's inspection system.

In addition, the GVI prepared guidelines, checklists, and instructions for the following activities:

- The inspection frequency of food business operators is officially supervised by the GVI
- Procedures to be followed by the PVI for registration, approval, conditional approval or suspension and withdrawal of approval of establishments
- The microbiological sampling of food of animal origin and contact surfaces such as *Salmonella*, *Im*, generic *E. coli* and *Enterobacteriaceae*, carried out by establishments
- The performance of official controls regarding traceability of animals, foodstuffs, substances intended to be added to food as well as marking of products of animal origin
- The scope and method of carrying out the National Residue Control Plan of prohibited substances, chemical, biological

The second level of the CCA, the PVO, is subordinate to the Chief Veterinarian as far as the food safety concerns. Additionally, the Provincial veterinarian shall, according to the Law of January 29, 2004, Chapter 2, Article 14, 1, organize training for official veterinarians, issue instructions for district veterinarians in the given province and monitor the implementation of the inspection tasks. In addition, the PVO is responsible for analyzing and evaluating the safety of animal products and animal feed, and implementing veterinary regulations. The document further states that the Provincial veterinarian shall provide the Chief Veterinarian with information about the implementation of the inspection tasks in the respective province of operation no later than March 30 of each year. There are 16 provinces in Poland and each province is composed of 15 to 32 districts.

The third level of the CCA is represented by the DVI, which is responsible for all inspection activities, including meat inspection and periodic supervisory reviews at each U.S. certified establishment. Additionally, the in-plant veterinarian, who is subordinate to the DVI, shall according to the Law of January 29, 2004, Chapter 2, and Art. 16 perform supervision of slaughtering of animals, including ante and post-mortem inspections, and supervision of application of regulations of animal protection during slaughter, and perform supervision of cutting, processing and storage of meat and issuance of required health certificates. According to Article 14, 3 of the same Law, the District Veterinarian shall provide the Provincial Veterinarian with information about the implementation of the inspection tasks, in the respective district of operation, no later than March 28 of each year. There are 314 districts in Poland.

During the GVI HQ audit, the FSIS auditors learned that the CCA had adopted a new organizational structure. The FSIS auditors discovered during an interview with the CCA officials that the new structure included an office of "laboratory council". This new office provides oversight to the country's official laboratory system. There were no other major changes in the structure and function of the Polish Inspection Service.

- There was inconsistency in the enforcement of the laws and regulations governing meat and poultry inspection in official establishments at which products are prepared for export to the United States. In some instances, the inspection personnel failed to follow the established procedure by closing the administrative decisions within the specified timeframe. Noncompliance with the sanitation and the microbiological follow-up testing requirements due for closure were still open during the FSIS review. The inspection program personnel indicated that the establishments' corrective actions were completed with the specified time frame but there were no documented evidence to confirm that claim. The PVI routine audits of the DVI did not identify any of the FSIS findings during their routine audit and did not take action to ensure that the corrective actions were properly taken and documented and the law and regulations were consistently enforced throughout the inspection system. In response to FSIS findings, the PVI/DVI decided to initiate a corrective action that intended to ensure that all administrative decisions are closeout and documented within the specified timeframe.

Government and establishment documents were reviewed and observations were made at establishments visited during the audit. In most of the cases, observations reflected that government inspection officials consistently identified, documented and verified the adequacy of corrective actions when non-compliance with GVI regulations and export requirements occurs in the PVI/DVI offices.

The verification activities conducted by FSIS audit team during the audit also assessed whether the CCA exercises ultimate control and supervision over the official activities of all employees or licensees of the system.

The process for hiring inspection personnel can be done in two ways:

- 1) Through a competitive hiring process which requires a level of "complete transparency" throughout the hiring process. Potential candidates must undergo a competitive exam and interview with other candidates.
- 2) By Appointment which require specific qualifications, which are spelled out in the Act on veterinary inspection January 2006.

In addition, the qualifications in EC Regulation 854/2004 Chapter IV, of Annex I for both official veterinarians and auxiliaries must be met. The program is funded through Poland's Ministry of Finance.

The Veterinary Inspection Act of 29 January 2004 authorizes exports to third countries. In accordance with Article 23 of the Products of Animal Origin Act of 16 December 2005 the District Veterinary Officer (DVO) can prohibit the export of products of animal origin from establishments approved for export to a third country if this establishment or its products do not comply with requirements laid down by this third country. Once, the product is prohibited for export, the DVO informs the CVO of the decision. The information gathered by interviewing government officials was consistent with information provided by the Polish CCA through the FSIS SRT.

According to the Veterinary Inspection Law of January 29, 2004, Chapter 2, Article 13(8) "The Chief Veterinarian shall organize training for official veterinarians". Veterinarians complete introduction training to develop and master technical, regulatory, food safety auditing, and supervisory skills needed to perform their duties. The auditor interviewed the DVI and learned that a U.S.-based consulting group periodically provides training of the U.S. requirements to the government officials and private industry.

All inspection activities including food safety and other consumer protection are performed by government officials. Some government meat inspectors are stationed along the slaughter line conducting post-mortem inspection and others perform off line inspection duties. The auditor observed that during post-mortem inspection of heads, viscera and carcasses, government inspectors identify conditions of food safety importance and other consumer protection defects under the supervision of the in-plant veterinarian of DVI. The CCA is responsible for ante-mortem inspection, all suspect carcass dispositions, and verification of the adequacy of post mortem inspection. FSIS auditor verified that the ante-mortem inspection, disposition and post-mortem inspection was carried out as stated in SRT.

The Polish inspection personnel assigned to the U.S. certified establishments are official employees of the government, according to the Law of January 29, 2004 on Veterinary Inspection, Chapter 2, Article 12.

The veterinarians are assigned to the following categories:

- Permanent government employees
- Private veterinarians who are designated as "official veterinarians" by district offices on an as needed basis

Auxiliaries (non-veterinarians) are permanent government employees.

The government pays Poland's inspection personnel. Payment is subject to civil service laws. "Task appointed" official veterinarians are paid by funds which are collected from establishments for services rendered by the district government, thereby avoiding direct payment of these individuals by the establishments they regulate.

All relevant legislation/regulations are distributed as official guidelines and instructions to inspection personnel. There are several ways that information is distributed to the field inspection and are as follows:

- A cascade of information from HQ to the Provincial office and then to the District-In-plant inspection offices.
- Relevant translated documents are available on the general veterinary website.

- Through email / Hardcopy correspondence sent out from various levels to the offices, which HQ oversees.
- Through meetings held at various levels (e.g. provincial officials may meet at the HQ level, and then hold meetings in their province with the district officials).
- The CVO, under Article 13 of the veterinary inspection law has the authority and responsibility to issue decrees and distribute them as needed.
- By the U.S.-based HACCP consulting group which periodically provides training of the U.S. requirements to the government officials and private industry. In 2009 and 2011 the U.S. Embassy arranged for training of Polish Inspection Officials in U.S. inspection requirements.

Poland's ongoing training program depends mainly on cascade training. As a general rule, inspection officials are trained at the GVI office and then convey the knowledge gained to other colleagues. The FSIS review of the ongoing training program revealed that:

- Evidence of staff participation in training was available at first level but no evidence of training or training records were presented for the subsequent training levels.
- The ongoing training program lacks a mechanism that assesses the effectiveness of the training. The inspection personnel involved in the daily enforcement of the regulatory requirements affecting export to the U.S. are more likely to be the second or third recipients of the ongoing training. This may have been the root cause of misunderstanding of information related to the implementation of HACCP, SSOP and standard sampling procedures as evident by some of the FSIS's audit findings.
- The CCA did not have official training records to indicate the subject of the training or the attendee of the training at the PVO and DVO levels. This practice may hinder the effectiveness of the CCA's ongoing plan to continuously analyze and implement the staffing requirements at certified establishments due to the lack of accurate information and tracked records at all levels of the CCA.

During the audit of PVIs/DVIs, FSIS interviewed government officials and reviewed the official inspection records, such as SSOP, PR/HACCP, residue and potable water testing results to verify that the Polish meat inspection system has the legislative basis to exert uniform regulatory control over the production activities of U.S. certified establishments.

Direct supervision of the in-plant inspection personnel is performed by a single individual who is assigned from the district office to be in charge of activities associated with export to the U.S. This individual works across district in conjunction with supervisors at the district level. Periodic supervisory reviews of district office officials and the individual assigned to a particular establishment are conducted at the provincial level.

FSIS also audited government in plant activities related to collection of tissue samples to be analyzed by chemical laboratories as part of the National Residue Control program of Poland. Laboratory testing system consists of National Reference Laboratory and 16 PVLs. The government laboratories, specifically, the Provincial Veterinary Laboratories (PVL) are responsible for conducting chemical and microbiological testing of US destined product.

The CCA provides oversight for technical support of Poland's laboratory system. This is accomplished by conducting verification of adequacy of functions of laboratories at different levels. At the in-plant level, the collection, handling and shipping of *Salmonella* species samples to accredited laboratories are conducted by the government inspectors, while RTE environmental and product samples are collected by the industry or laboratory officials. Laboratories that are part of the technical support of the system must gain and maintain accreditation.

The GVI also requires that accredited laboratories use approved methods of analysis, participate and perform satisfactorily in proficiency testing programs administered by the accrediting bodies and report results directly to the CCA. Adequacy of the functions of microbiological provincial laboratories is verified by the Provincial Veterinary Inspectorate (PVI). Conversely, chemical laboratories are audited by the PVI assigned to the National Residue Program. In both instances, PVI auditors, using ISO standard 17025, evaluated the laboratories. Results of the PVI audits were documented and corrective actions were verified by PVI for their acceptability and adequacy. A sample of the PVI audits was reviewed by FSIS during the audit. The FSIS auditors found that the corrective actions taken by the laboratories' management and the PVO, in response to the audit reports, were appropriate.

During the GVI interviews, it became evident that the CCA may use, in limited cases, private laboratories to analyze official samples. These laboratories are certified by the CVO and approved to perform specific official analysis. As a result of the audit, FSIS identified the following concerns:

- The inspection system failed to carry out the *Salmonella* testing as per the instruction of the CVO in one establishment. Official swine sponge samples were collected by an auxiliary private lab or establishment personnel under the supervision of the veterinary inspector. Further investigations of this finding indicated that the designated veterinarian was following a written instruction from the PVI and the DVI offices that direct the inspection personnel to use the establishments' employees to collect official samples.

In conclusion, this audit indicated that the CCA has administrative controls in place to support the inspection system. There was inconsistency in the enforcement of the regulations. The CCA has initial and ongoing training program. The ongoing training, as implemented, did not ensure proper dissemination of information, assessment or maintenance of accurate records at all training levels. The FSIS concluded that the Polish poultry inspection system meets the basic requirements for this equivalence component. The CCA needs to properly address all the audit findings to fully meet the requirements of this component.

6. STATUTORY AUTHORITY AND FOOD SAFETY REGULATIONS

The second of the six equivalence components that the FSIS auditor reviewed was Statutory Authority and Food Safety Regulations (SAFSR). This component pertains to the legal authority and the regulatory framework utilized by the CCA to impose requirements equivalent to those governing the system of meat inspection organized and maintained by the United States.

Upon review of the information provided in the SRT and verification during the on-site audit, the auditor concluded that the inspection system of Poland has statutory authority to deliver inspection to all certified establishments. The CCA has rules that require official inspection personnel, laboratories and establishments meet the requirements of importing countries. In

addition, the system has regulatory requirements for ante-mortem and post-mortem inspection, as well as processing activities, control of inedible and condemned materials, and requirements for daily inspection as well as periodic supervisory reviews of certified establishments.

The FSIS verified during the on-site audit that all animals presented for slaughter undergo ante-mortem inspection, which is conducted by the CCA/DVI at all establishments as reported by the CCA in the SRT. The DVI officials verify that livestock presented for slaughter arrives at the establishments accompanied by required documentation and adequately identification that allow the system to trace products back to primary centers of production where the animals were raised. Government officials detect abnormalities in livestock presented for slaughter in accordance with work instructions issued by the DVI. The officials also evaluate the adequacy of ante-mortem facilities and assess compliance of operators with humane handling requirements imposed by CCA and country import requirements.

According to the Ordinance of the Minister of Agriculture and Rural Development of 24 November 2009 on keeping animal ante-mortem and post-mortem inspection record by the official veterinarian, article 1 states that within the framework of official control of products of animal origin the official veterinarian is responsible for the following activities in the slaughter house:

- Checking and analyzing information on food chain accompanying animals intended for slaughter;
- Performing veterinary ante-mortem inspection of all animals before slaughter (that inspection must take place within 24 hours of arrival at the slaughterhouse and less than 24 hours before slaughter);
- Verifying compliance with relevant Community and national rules on animal welfare;
- Performing post-mortem inspection of carcasses and accompanying offal without delay after slaughter;
- Controlling the removal, separation or marking of specified risk material and other animal by-products;
- Ensuring that sampling takes place and that samples are appropriately identified and handled and sent to the appropriate laboratory;
- The application of mark of inspection by the official veterinarians.
- Keeping records related to inspection in the form of animal ante-mortem inspection record;
- Keeping records related to the inspection in the form of animal post-mortem inspection record;

The responsibilities of in-plant DVIs are to conduct ante-mortem inspection, make post-mortem dispositions of retained carcasses, verify adequacy of post-mortem inspection, monitor and verify compliance of establishments with their government approved food safety programs and supervise and manage inspection personnel.

The ante-mortem and post-mortem inspection records are kept in a paper form, which are compliant with the Annex of this Ordinance.

Additionally, during the HQ audit the auditor has learned that ante-mortem inspection can be performed on farms, according to the EC Directive 854/2004 of the European Parliament which is acceptable to the U.S.

Post-mortem inspection is performed by inspectors or veterinarians. Supervision of this process is conducted by in-plant veterinarians who maintain on-going communication with meat inspectors. The District Veterinary Officer conducts periodic supervisory reviews to ensure that products are produced under sanitary conditions and equipment and facilities are properly maintained. The PVI and DVI audit establishments on a regular basis and document their findings. Operators in turn, maintain acceptable sanitary conditions.

Post-mortem inspection procedures were verified by the FSIS auditor and observed that certified establishments provide inspection stations that are adequately furnished to allow proper post-mortem inspection of adequately identified heads, viscera and carcasses. Synchronization of carcasses with viscera and heads was performed properly. During the audit of the establishments sector of the meat inspection system, the auditor verified that personnel assigned to conduct post-mortem inspection possess the ability to consistently and accurately identify food safety and other consumer protection defects found in heads, viscera and carcasses. Documents reviewed indicated that the disposition of retained carcasses was properly performed. The adequacy of post-mortem inspection is monitored daily by the official veterinarian. The official veterinarian has a legal authority to slow production by requesting an adjustment of the stunning rate of animals to ensure adequate post-mortem inspection.

The inspection system provides daily inspection at certified establishments. This information was verified by the auditor during the audit of all certified establishments. The humane handling and slaughter of animals is also controlled by the official veterinarians, where there is a government veterinarian assigned only for the stunning operation.

- At one swine slaughter establishment, the FSIS auditor noted that a pen used to hold suspect animals lacked the appropriate conveyances to provide animals with continuous access to water. The explanation given by inspection personnel interviewed at this time was that the pen in question served only as transient housing, as the standard practice was that all suspect animals were immediately sent to sanitary slaughter and not held for any length of time. However, this situation does not fully meet the requirements of Annex III Section I Chapter II 1. (a) of the EC Regulation 853/2004 of the European Parliament, which requires that livestock is required to have access to water at all times while in holding pens.

Post-mortem inspection is performed either by veterinarians or inspectors. Condemned product is under control of the inspection service. The transportation of condemned product for disposal is performed by the establishment or by the rendering company. In some cases, the rendering company collects the condemned material.

On-site periodic supervisory reviews conducted by Provincial and District Offices further ensure that correlation of standards is maintained and adjustments implemented. The FSIS auditors reviewed SSOP and daily inspection records and verified, analyzed and concluded that DVI personnel stationed at the audited establishments were familiar with the US requirements.

The FSIS auditor verified that the periodic supervisory audits conducted by the PVIs and DVIs at the audited establishments included evaluations of the functions of establishments and government officials as well as the records they generated and maintained. The verifications indicated that deficiencies identified during periodic reviews of the performance of official

personnel and operators are analyzed by the CCA and followed up with corrective action and preventive measures where appropriate. Additionally, inadequacies in the performance of official duties on the part of official inspectors are corrected and measures are implemented to prevent their recurrence in accordance with work instructions issued by the CCA.

- While in most cases inspection personnel demonstrated knowledge of the U.S. inspection system. The portion of supervisory reviews related to employee performance was not conducted on all official and appointed veterinarians according to the scheduled frequency of one annual supervisory review for each veterinarian. Furthermore, the supervisory reviews of inspection employees, when conducted, do not usually include observing VI collecting official samples or discuss the noncompliance and deficiencies found during the supervisory review of the establishment structure and operation. The assessment of the knowledge and performance of the VI is an important factor in addressing inadequacies in the performance of official duties. The supervisory intervention may include the implementation of measures to, protect the public health, prevent recurrence of performance deficiencies, and ensure consistently and homogeneous application of the CCA instructions.

In conclusion, Poland's meat inspection system has the legal authority and regulatory framework to impose requirements equivalent to those maintained by the U.S. Governmental oversight and the frequency of supervisory reviews in some Districts need to ensure that all inspection tasks and procedures are followed as directed by their regulations. There were no systemic non-compliances observed, therefore this component continues to be equivalent.

7. SANITATION

The third of the six equivalence components that the FSIS auditor reviewed was Sanitation. The inspection system must provide requirements for sanitation, for sanitary handling of products, and for the development and implementation of sanitation standard operating procedures.

The auditor's assessment of the design and implementation of sanitation programs at the establishments exporting to the U.S. included interviews of inspection officials, a review of monitoring records, documented corrective actions, training program for employees as well as official verification activities conducted to support the conclusion that the CCA effectively implements its requirements for sanitation and sanitary handling of meat products intended for export to the United States.

The meat inspection system of Poland requires that establishments operate in a manner that prevents the creation of insanitary conditions and prevents direct product contamination. In-plant inspection personnel evaluate the ability of the establishment to meet the regulatory requirements on a regular basis. Official verification includes assessments of the a) physical structures of the establishments and their maintenance, b) written procedures in place that describe how the establishment has to monitor adequacy of the facilities, c) analysis of product flow and establishment personnel flow, d) preventive maintenance of equipment and structures, and e) method to classify the severity of the deficiencies.

The FSIS document review indicated that the CCA has adopted the FSIS regulatory requirements for SSOP (9 CFR Part 416.11-16) and incorporated the requirements into its regulatory design through the *Guidelines for Managing the Sanitation of Plants and Plan Operations*; the *Instruction of the Chief Veterinary Officer Number GIWhig 500/2/05 of May 2, 2005*; and the *Act*

of May 11, 2001 on the health conditions of food and nutrition as amended. In Response to the SRT, Poland indicated that the inspection system has adopted FSIS Directive 5000.1 as guidance for the inspection personnel on how they are to verify the establishment's compliance with the SSOP regulations. However, the FSIS's review of documents and interview conducted at the CCA HQ revealed that the CCA has no current regulation, policy or instruction in place to support the enforcement of the adopted FSIS measure. The CCA explained the lack of regulatory measures as the consequence of a recent amendment of the *act on the health conditions of food and nutrition*. The amendment resulted in the removal of articles that provide for the issuance of the GVO instruction and guidelines that specifically require establishments seeking certification to meet the export requirements to the United States; specifically the requirements related to the development of a written SSOP plan, implementation the written procedure and documenting the findings in accordance with 9 CFR Part 416.11-16.

- Although the inspection system was implementing SSOP requirements at establishments intended to be certified to export product to the United States, the Polish inspection system lacked current regulation or policy that authorize the CCA to require these establishments to develop and maintain SSOP's. The CCA acknowledged this finding and made a commitment to reinstate the amended articles and reissue the GVO instruction. The CCA's initial respond, however, did not specifically link the conduction of measures that are intimately tied to 9 CFR 416 with any relevant legislation. The CCA should demonstrate legislative commitment to the specific inspection measures through the issuance and dissemination of regulation, policy, written guidance, or any other form of legislation to the inspection personnel and the regulated industry.

During the on-site audit of this component, the FSIS auditor verified the functions of the PVI's and DVI's as they evaluated the sanitary conditions of establishments. Also, the auditor observed that the inspection system is maintaining the sanitation requirements including SSOP at the certified establishments.

Furthermore, the FSIS auditor verified the ability of the CCA to assess the adequacy of pre-operational and operational sanitation, record keeping maintained by the operator, and official documentation regarding non-compliances. When a noncompliance is issued, the DVO issues an administrative decision to the establishment which includes a deadline for the rectification of the identified deficiency. This administrative decision is expected to be closed when the inspection personnel verify the completion of the corrective action taken by the establishment. Poland's inspection policy requires a verification signature of the inspection official.

The following were findings observed by the FSIS auditors:

- The inspection personnel at one pork establishment failed to verify the completion of one corrective action that was proposed by the establishment's program in response to positive *Lm* findings in the post lethality environment.
- At one of the visited establishments, the sanitation records used generalized terms to describe the status of the establishment's sanitary conditions and findings. This lack of accurate descriptions of the sanitation findings may hinder the inspection personnel ability to verify the establishment's corrective actions and ensure appropriate disposition of product that may be contaminated, restoration of sanitary conditions, and prevent the recurrence of direct contamination or adulteration of product. The inspection personnel at the visited establishment have failed to identify such findings as noncompliance. These findings have

not been identified during the periodic supervisory review. This may serve as additional evidence for the need to improve the ongoing training program of the inspection personnel and the need to include an assessment of the inspection personnel knowledge during the supervisory review.

In accordance with the above findings, the FSIS concluded Poland's inspection system did not fully meet the requirements for this equivalence component. This equivalence component will meet the requirements provided that CCA amends the Act of May 11, 2001, by specifically addressing the requirement for the development and maintenance of written SSOP plan and records. The government of Poland acknowledged during the exit conference that the language would be reinserted in the future, and provide this information to FSIS.

8. HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEMS

The fourth of the six equivalence components the FSIS auditor reviewed was HACCP. The inspection system must require that each official establishment develop, implement and maintain a HACCP plan.

The FSIS auditor verified that the CCA of Poland's meat inspection system requires operators that wish to participate in production of meat products for export to the U.S. implement and maintain a HACCP program. The CCA provides guidelines for operators to develop their HACCP programs. The guidelines communicate the fundamental seven principles of HACCP.

The FSIS document review indicated that CCA has adopted FSIS's regulatory requirements for the implementation of HACCP according to 9 CFR Part 417 et seq. and incorporated the requirements into the country regulatory design through the *Guidelines for Managing the Sanitation of Plants and plan Operations*; the *Instruction of the Chief Veterinary Officer Number GIWhig 500/2/05 of May 2, 2005*; and the *Act of May 11, 2001 on the health conditions of food and nutrition* as amended. In Response to the SRT, Poland indicated that the inspection system has adopted FSIS Directive 5000.1 as guidance for the inspection personnel on how they are to verify the establishment's compliance with the HACCP regulations. However, the FSIS's review of documents and interview conducted at the CCA revealed that the CCA lacked current regulation, policy or instruction in place to support the current enforcement of the adopted FSIS's measures. The CCA explained the lack of regulatory measures as a consequence of a recent amendment of the *Act on the health conditions of food and nutrition*. The amendment resulted in the removal of articles that provide for the issuance of the GVO instruction and guidelines that specifically requires establishment seeking certification for exporting product to the United States to implement HACCP requirements in accordance with 9 CFR Part 417.

- Although the inspection system personnel were enforcing HACCP requirements at establishments intended to be certified to export product to the United States., the Polish inspection system did not possess current regulation or policy that authorize the CCA to require these establishments to implement the adopted HACCP measures as described in 9 CFR 417. The equivalence criteria of this component call for the inspection system to have HACCP requirements grounded in the country's requisite laws and regulations. The CCA acknowledged this finding and made a commitment to reinstate the amended articles and reissue the GVO instruction. The CCA's initial response, however, did not provide a precise link between the conduction of inspection measures that are intimately tied to 9 CFR 417 and any relevant legislation. The CCA should demonstrate legislative commitment to the specific inspection measures through the issuance and dissemination of regulation, policy, written guidance, or any other form of legislation to the inspection personnel and the regulated industry.

In accordance with the above findings, the FSIS concluded that Poland's inspection system did not fully meet the requirements for this equivalence component. The CCA must take measures to ensure that the previously described HACCP requirements are grounded in the country's requisite laws and regulations through the issuance of legislation, policy, instructions or any other appropriate measure.

This equivalence component will meet the requirements provided that CCA amends the Act of May 11, 2001, by specifically addressing the requirement for the development and maintenance of written HACCP plan and records. The government of Poland acknowledged during the exit conference that the language would be reinserted in the future, and provide this information to FSIS.

9. CHEMICAL RESIDUES

The fifth of the six equivalence components that the FSIS auditor reviewed was Chemical Residues Control Programs. This component pertains to regulatory requirements for the inspection system to have a chemical residue control program that is organized and administered by the national government. The program must include random sampling of internal organs and fat of carcasses for chemical residues identified by the exporting country's meat and poultry inspection authorities or by FSIS as potential contaminants.

During the audit of the Polish meat inspection system, the oversight provided by the CCA and the auditing process of the functions of chemical laboratories were assessed by the FSIS auditor. Laboratory conditions, QC of tests, calibration records, approved analytical methods used, controls of data, sample receiving, expiration of media, records of the residue analysis and intra/inter laboratory check samples, the CCA frequencies and follow up oversight generated by the CCA, laboratory procedures, collection and sample analysis as well as oversight of corrective action and results of past audits were evaluated and found to be acceptable.

The GVI is the competent authority for the control of residues in live animals and animal products. The GVI, at the central level in conjunction with the NRL is responsible for preparing, issuing and supervising the annual National Residue Control Plan (NRCP). The PVI is responsible for supervision of NRCP at the provincial level. The DVI together with eight veterinary laboratories and NRL are responsible for the implementation of NRCP.

The FSIS auditor verified that the GVI of the government of Poland has maintained monitoring and surveillance of animals and animal products to detect evidence of chemical residues in edible tissues. As part of the meat inspection system, the CCA identifies potential problems and follow up to address violations or emerging issues related to the presence of chemical residues and contaminants in food. Results of the random monitoring program provide the CCA with indicators of the adequacy of controls of chemical residues at primary centers of production.

Factors considered when determining the annual monitoring residue program include registered use of a particular chemical, likely occurrence of residues, extent and pattern of use, incentives for misuse, persistence of the compound in the environment, past monitoring results, availability of suitable analytical methods, testing capacity and laboratory proficiency, testing arrangements, specific overseas requirements and perceptions of the residue as a possible public health hazard.

The CCA-PVI manages national random and targeted testing programs for chemical residues. The design of the testing programs and operational processes include sample collection, shipping to laboratories, management and analysis of data and initiation of trace-back activities and are managed by the Provincial/Regional Veterinary Laboratories (PVL).

Laboratories have been accredited by the Polish Accreditation Body (PCA). Proficiency test (PT) instructions for provincial and private laboratories were developed by the CVO. Audit results and proficiency test results are sent to the Provincial Veterinary Laboratory and the Regional Veterinary Office. The NRL in Pulawy participated in many FAPAS organized PT samples.

The authority to approve and disapprove laboratories for chemical analyses is found in EC Regulation 882/2004 articles 12, 32 and 33. Additionally, the GVI conveys U.S. inspection requirements to all government laboratories involved in testing of US certified establishments.

GVI officials have the legal authority to condemn food products when laboratory analysis indicates the presence of chemical residues at a level that exceeds Polish and E.U. standards. When instructed by the District Veterinary Office, officials stationed at slaughter establishments collect monitoring residue samples in accordance with a standard operating procedure. The IIC of the sampling establishment assigns a number to the collected residue sample, which is not the establishment number. This number is kept by the government laboratory and sent back to the District and Provincial offices for the monitoring samples. Collected samples are sent to the Provincial Veterinary laboratories. In the case of a complicated analysis such as dioxin, samples are sent to the National Reference Laboratory (NRL) in Pulawy.

When results of the analyses exceed regulatory limits, the meat inspection system responds by implementing measures to stop contaminated product from entering the market and to determine the source of the contamination. Upon detection of a non-compliant sample, laboratories immediately electronically transmit the test results to the PVI, which in turn forwards the information to the pertinent government offices to preclude distribution of food or initiate a recall of meat products and deal with the problem at its source. No non-compliance has been observed during the laboratory audit.

There were no systemic non-compliances observed, therefore this component continues to be equivalent.

10. CCA MICROBIOLOGICAL TESTING PROGRAMS

The sixth of the six equivalence components that the FSIS auditor reviewed was Microbiological Testing Programs. This component pertains to regulatory requirements for the inspection system to have a microbiological testing program, organized and administered by the national government.

The principal criteria used by FSIS to assess microbiological testing programs for raw meat include; the inspection system provides for sampling and testing programs for generic *E. coli*, and *Salmonella* spp. The CCA uses the test results to verify the adequacy of establishments' sanitary slaughter and dressing controls, food safety systems and pathogen reduction strategies. The program used by a given country must be supported by analytical test results, countrywide microbiological baseline surveys and/or other scientific data.

During the audit of this component, the FSIS auditor verified that the meat inspection system of Poland administers a national regulatory microbiological monitoring program for slaughter and meat processing plants regardless of whether their products are destined for the domestic market or for export to the United States. One aspect of the program (*Salmonella*) by the CCA and generic *E. coli* testing by establishments provides indicators of the adequacy of dressing procedures and hygienic practices conducted by operators and another (*Lm*) testing is used to verify that the food safety controls are effective in RTE product. Both micro testing programs were audited by the FSIS auditors and non non-compliances were observed. In both instances, CCA gathers the generated data from approved private and commercial microbiological laboratories.

The government laboratories conduct internal audits which were checked during the inspection. Recommended corrective actions were followed up. Warsaw and Kielce laboratories have their own internal audit staff which have been trained by PROLAB, an outside provider, to conduct audits. Proficiency test instructions for regional and private laboratories for microbiology were provided with a form, which was included on the list developed by the CVO. In addition, a list of proficiency tests the labs participated in was provided by the CVO and the quality manager at the NRL. The proficiency test results were reviewed by the audit team and results met required limits.

The GVI conveys U.S. inspection requirements to the NRL. The CCA provided the auditors with two documents; first a letter to the NRL stating the US requirement to change the *Salmonella* sample size to 325 g and to implement ISO 11290-1 and, second, the use of ISO 11290-2 for confirmation and enumeration which was observed in *Lm* analysis at Kielce and Pulawy laboratories.

All certified slaughter establishments are required to meet regulatory standards set by the CCA for the monitoring of generic *E. coli* and *Salmonella* in raw products. Operators must collect samples from carcasses in accordance with standardized sampling, handling and shipping protocols. The sample results are analyzed at GVI, where based on those analysed results, the new testing program is prepared. This program is approved at PVI/RVI level and at PCA accredited laboratories. These accredited laboratories report results of their analyses to PVI and establishment operators at the same time. Results of the analyses of samples for generic *E. coli* are quantified and reported in colony forming units per square centimetre (cfu/cm²). *Salmonella* results are qualitatively assessed, i.e. detected or not detected.

Sampling of carcasses for generic *E. coli* is performed by establishments and verified by the inspection service. When generic *E. coli* results exceed the established maximum limits, the Polish meat inspection system requires that the establishment initiate a review of its carcass dressing procedures to identify possible causative factors contributing to the high cfu/ cm² results and determine the actions it will take to prevent recurrence. The results of the review are to be documented and made available for the DVI in-plant staff.

If the *Salmonella* testing finds a positive sample, the operator is required to immediately commence daily sampling until satisfactory results are obtained and institute sanitation and hygienic procedures deemed acceptable by the CCA to prevent recurrence. If the standard is exceeded a second time, the establishment must re-assess its HACCP plan, take appropriate corrective action and start sampling a third time. Failure by the establishment to meet standard for the third consecutive time is deemed by the Polish authorities as a failure to maintain the minimum standard for slaughter hygiene and sanitation, and consequently would bring into question the adequacy of the HACCP plan of the establishment. Accordingly, the CCA would impose regulatory sanctions consistent with the statutory framework of the Polish meat inspection system and exclude such an operator from the export program. This procedure was observed during the establishment audit with satisfactory conclusion.

The microbiological testing program also includes provisions for the testing of RTE products for the presence of *Listeria monocytogenes*, and *Salmonella* at certified establishments. These provisions are to be addressed by operators in their HACCP plans. GVI oversight of this aspect of microbial controls consists of maintaining continuous verification of processing at establishments producing RTE products to ensure that they meet the regulatory requirements of the United States. Furthermore, GVI officials verify that the risk based selection of the testing frequency is consistent with the type of products that are produced by the establishment and that monitoring and verification activities are adequately performed. This was confirmed by the auditor during establishment audits.

There are no requirements for routine microbiological testing for thermally processed commercially sterile (canned) products. However, the inspection system is expected to demonstrate capability to maintain a microbiological program that would ensure canned products produced for export to the U.S. are safe and wholesome and not contaminated with *Clostridium botulinum* spores or toxins when there is suspension of process deviations, under processing, or when inspection personnel observe abnormal containers that need to be submitted for laboratory analysis.

During the audit of the three Provincial Veterinary Laboratories and the National Reference Laboratory/National Veterinary Institute in Pulawy, it was observed that all the laboratories were using the following approved methods for testing of U.S. product:

- *Salmonella* in RTE product – PN-ISO 6579:2003
- *Listeria*-like or *Listeria* spp – PN-ISO 11290-1
- *Listeria Monocytogenes* in RTE – PN-ISO 11290 – 1
- *Salmonella* porcine carcasses – PN-ISO 6579:2003

During the audit of the Polish meat inspection system, the oversight provided by the CCA and the auditing process of the functions of microbiological laboratories were assessed by the FSIS auditor. Laboratory conditions, records generated intra-laboratory check sample, and results of past audits were evaluated and found to be acceptable.

In conclusion, an improper procedure of *Salmonella* carcass sample collection was observed in one establishment. The current procedure to analyze *Salmonella* spp requires that samples must be analyzed in government laboratories. In one case, a private laboratory was used for *Salmonella* spp testing. However, this component of the Polish meat inspection system remains equivalent. There were no systemic non-compliances observed during this audit.

11. EXIT MEETING

An exit meeting was held on June 1, 2011 in Warsaw with representatives of the CCA. At this meeting, the results of the audit were presented by the FSIS auditor.

The CCA understood the findings and indicated that upon receipt of the draft final report they would present their view on the findings.

12. CONCLUSIONS AND NEED FOR FURTHER ACTIONS

During this audit, not all establishments were producing product for export to the U.S. This audit was based on Polish national and Poland's implementation of EU legislation and with additional FSIS requirements.

The auditors concluded that the CCA was able to meet the principal requirements for the following equivalence components of Government Oversight, Statutory Authority and Food Safety Regulations, Chemical Residue Control Programs and Microbiological Testing Programs.

Findings of systemic impact were identified within the equivalence components of (3) Sanitation, and (4) Hazard Analysis and Critical Control Points.

The following is a summary of findings observed during the audit:

The inspection system is organized to establish uniform enforcement of the laws and regulations governing meat inspection in the majority of the official establishments at which products are prepared for export to the United States. However, FSIS observed that there was a failure of some PVI/DVI offices to enforce the close out of the corrective action by issuing administrative decision in response to non-compliance with the sanitation and the microbial follow-up testing requirements within the specified deadlines.

Upon the issuance of noncompliance, the DVO issues administrative decision which includes a deadline for the rectification of the identified deficiency. This administrative decision was expected be closed when the inspection personnel verified the completion of the corrective action taken by the establishment. This action should have been documented.

In some instances, the administrative decisions were not closed within the specified deadline to indicate that identified deficiencies were properly corrected. The PVI's routine audits of the DVI did not identify any of these findings and did not take action to ensure that the corrective actions were properly taken and documented and the law and regulations were uniformly enforced throughout the inspection system.

Evidence of staff participation in training was available at first level but no evidence of training or training records were presented for the subsequent training levels.

The ongoing training program lacks a mechanism to ensure accurate flow of information from the trainer to the trainee at subsequent levels. The inspection personnel involved in the daily enforcement of the FSIS regulatory requirements are more likely to be the second or third recipients of the ongoing training. This may have been the root caused of misunderstanding of information related to the implementation of collection of microbiological samples as evident by some of the FSIS's audit findings.

The CCA failed to implement the *Salmonella spp.* testing program as per program instruction in one establishment. Official swine sponge samples were collected by a private lab or by establishment personnel under the supervision of the veterinary inspector while the program is written for inspection personnel to collect samples. Additionally, *Salmonella* samples collected under the supervision of veterinary inspector were sent to a private laboratory. The CVO instructions state that samples are to be collected by official veterinarians and sent to the government laboratory. Poland has not informed the U.S. whether private labs may be used to analyze official samples.

During the on-site audit, the FSIS auditor identified that the inspection personnel at an U.S.-certified pork slaughter establishment failed to enforce the humane handling requirements of providing the drinking water while livestock was being held in the suspect pen at the establishment. The Annex III Section I Chapter II 1. (a) of the EC Regulation 853/2004 of the European Parliament has the same requirement as 9 CFR 313.2 (e) which states that livestock is required to have access to water at all times while in holding pens.

The supervisory reviews were not conducted on all official and appointed veterinarian according to the scheduled frequency of one annual supervisory review for each veterinarian. The supervisory reviews of inspection employees, when conducted, do not usually include observing VI collecting official samples or discuss the noncompliance and deficiencies found during the supervisory review of the establishment structure and operation. The assessment of the knowledge and performance of the VI is an important factor in addressing inadequacies in the performance of official duties. The supervisory intervention may include the implementation of measures to, protect the public health, prevent recurrence of performance deficiencies, and ensure consistently and homogeneous application of the CCA instructions.

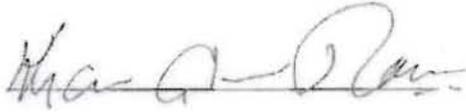
While reviewing the inspection documents at the PVI/RVI, the FSIS auditor learned that the Articles 28, 29, and 30 amendment of the Act on health condition of food and nutrition of May 11, 2001, the requirement for the development and maintenance of written SSOP and HACCP plan and records were not included in the Act. During the previous FSIS audits, it was identified that the required articles 28, 29, and 30 were present. The Polish CCA has acknowledged this omission and will reinsert the previous statement.

The CCA failed to verify the establishment's proposed corrective actions at one meat establishment in response to positive *Lm* findings in the post lethality environment.

To maintain an equivalent inspection system, the CCA has to submit a comprehensive corrective action plan addressing the specific audit findings outlined in the report for each component. FSIS will evaluate the extent to which the proffered corrective actions sufficiently address the systemic findings identified. Provided the corrective actions are sufficient, FSIS will verify the adequacy of corrective actions through requesting documentation during the ongoing verification process and/or an additional on-site audit

for

Oto Urban, DVM
Senior Program Auditor



DVM

13. ATTACHMENTS TO THE AUDIT REPORT

The Food Safety and Inspection Service (FSIS) received corrective actions in response to the May/June Audit of Poland's meat inspection system. FSIS has analyzed Poland's corrective actions and has requested additional information. FSIS is currently waiting for Poland's response.