



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

Dr. Peter Weber
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JUL 12 2001

The Food Safety and Inspection Service (FSIS) has completed two on-site audits of Austria's meat inspection program. The audits were conducted from November 19 - 26, 1999, and from March 6 - 7, 2000. Enclosed are copies of the two final audit reports. Austria's comments on the two draft final audit reports have been included as Attachment G. I apologize for the delay in providing these reports to you.

The audit reports describe a number of serious deficiencies that are similar to those found during the May 1998 audit of Austria's meat inspection system. At the exit conference for the 1998 audit, Austrian inspection officials assured the auditor that appropriate and effective corrective actions would be taken to rectify the observed deficiencies. FSIS is especially concerned that the same inspection system deficiencies noted in the May 1998 audit were found again in the November 1999 audit and the March 2000 audit. Therefore, we propose holding a teleconference with you and other Austrian inspection officials at the earliest date possible to review our concerns and discuss potential actions that may prevent any additional problems in the future.

We are looking forward to talking with you at the proposed teleconference. If you have questions regarding the audits or need additional information, please contact Nancy Goodwin at 202-720-6400. The fax number is 202-720-7990.

Sincerely,

151 Gary E. Stefan

Sally Stratmoen, Chief
Equivalence
International Policy Staff
Office of Policy, Program Development
and Evaluation

Enclosure



United States
Department of
Agriculture

Food Safety
And Inspection
Service

Technical
Service
Center

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Omaha, NE 68102

AUDIT REPORT FOR AUSTRIA MARCH 6 THROUGH MARCH 7, 2000

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Austria's Establishment 25-A from March 6 through March 7, 2000. One of the three establishments certified to export meat to the United States was audited.

The last audit of the Austrian meat inspection system was conducted in November 1999. Two establishments were audited and both were evaluated as acceptable/re-review. Establishment 25-A was certified to export meat to the United States on February 28, 2000, by Dr. Peter Vitus Stangle, Head of Department for Veterinary Services-Meat Hygiene/Residue Control (VSMHRC), in Austria. Establishment 25-A was audited as a special audit at the request of VSMHRC inspection officials.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Austrian national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. Establishment 25-A was selected for on-site audit as requested. The third was conducted by on-site visits to establishment. The fourth was a visit to one private laboratory, culturing field samples for the presence of microbiological contamination with *Salmonella*.

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

During on-site establishment visit, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program

delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials this was the case with Establishment 25-A.

RESULTS AND DISCUSSION

Summary

Based on the performance of Establishment 25-A, Austria's "In-Plant Inspection System Performance" was evaluated as In-Plant System Controls not In Place.

Establishment 25-A was found to be unacceptable. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

During this new audit, implementation of the required HACCP programs was found to be deficient in Establishment 25-A. Details are provided in the Slaughter/ Processing Controls section later in this report.

Entrance Meeting

On March 6, an entrance meeting was held at the Veterinary Services Office of the Federal Chancellery in Austria, and was attended by Dr. Peter Vitus Stangle, Head of Department for Veterinary Services-Meat Hygiene/Residue Control; Mr. Georg Brandl, MA, Veterinary Services-Veterinary Border Control and Dr. Faizur Choudry, International Audit Staff Officer. Topics of discussion included the following:

1. The audit itinerary and travel arrangements
2. Generic *E. coli* and *Salmonella* testing.
3. HACCP implementation
4. SSOP implementation
5. Enforcement – *Salmonella*/routine, Enforcement Report, Criminal Prosecution.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Austria's inspection system in November 1999.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally

conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called “the auditor”) observed and evaluated the process.

No records review was conducted at the meat inspection headquarters or the inspection service or at a district or regional office

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Austria as eligible to export meat products to the United States were full-time government employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Three establishments were certified to export meat products to the United States at the time this audit was conducted. Establishments 2 and 8 were audited by Dr. Oto Urban in November 1999 and one newly certified Establishment 25-A was visited for on-site audit by me. In Establishment 25-A, both VSMHRC inspection system controls and establishment system controls were not in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited, approved, and private laboratories.
2. Intra-laboratory quality assurance procedures, including sample handling.
3. Methodology.

Austria’s microbiological testing for *Salmonella* was being performed in private laboratories. One of these, the Institute for Bio-Analysis and Hygiene in Perg, Upper Austria was audited. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS’s Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratory was accredited/approved by the government.
2. The laboratories had properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses were being reported simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the one establishment:

Hogs slaughter, boning, and cutting in Establishment 25-A.

SANITATION CONTROLS

Based on the on-site audit of establishment 25-A, Austria's inspection service and establishment did not had adequate controls in place for lighting; maintenance and cleaning of over-product ceilings and equipment; product contact equipment; effective maintenance sanitation program; Pre-operational and operational SSOPs program; personnel protective coverings; cross contamination prevention; and condemned product control.

Sanitation Standard Operating Procedures (SSOPs)

Establishment 25-A was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with major variations. The daily pre-operational and operational SSOPs records did not reflect the actual sanitary conditions observed in Establishment 25-A.

Cross-Contamination

1. Dripping condensate from pipes, ceilings, and refrigeration units that were not cleaned/sanitized daily, was falling onto carcasses in the cooler. Old pieces of meat, blood, fat, mold, dirt, and black stains were observed on ceilings in the slaughter, boning, and offal rooms and coolers in Establishment 25-A. Neither establishment nor GOA officials took corrective actions.
2. Blood, fat, and fecal material were found on the automatic hog viscera conveyor after washing/sanitizing in the slaughter room. Neither establishment nor GOA officials took corrective actions.

Condition of Facilities Equipment

1. Overhead beams, pipes, and vent screens were observed with accumulations of fat, dirt and dust in the slaughter, boning, and offal rooms and coolers. A roller

conveyor for boxed edible product and cleaned edible product containers was found with pieces of fat, meat, dirt and dust, and water was dripping from containers onto the edible product stored underneath in the boning room and in one carcass cooler. Neither establishment nor GOA officials took corrective actions.

2. Numerous plastic cutting/boning boards in the boning and offal rooms were found with dried blood from previous days operation. The boards were deeply scored and in use with exposed product observed at the time of the review. Establishment officials ordered immediate correction and proposed preventive measures to GOA officials.

Product Protection & Handling

1. Personnel in the boning, offal and slaughter rooms were observed with worn out and deteriorated aprons. Establishment officials ordered prompt correction.
2. Hog carcasses were contacting work platform and employees boots at the retain carcass station in the slaughter room. Establishment officials proposed corrective and preventive measures to GOA inspection officials.

ANIMAL DISEASE CONTROLS

Austria's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Austria's National Residue Testing Plan for 2000 was being followed, and was on schedule. The Austrian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals. The Veterinary Drug Residue Laboratory in Molding, Austria was not visited.

Please see microbiology laboratory audit section.

SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the Austrian inspection system had controls in place to ensure adequate animal identification; antemortem inspection procedures; antemortem dispositions;

humane slaughter; postmortem inspection procedures; postmortem dispositions; pre-boning trim.

Control of condemned and inedible product: condemned carcasses, part of carcasses and other inedible products were not slashed and denatured prior to leaving the establishment. Neither establishment nor GOA inspection officials took corrective actions.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were audited and found to meet the basic FSIS regulatory requirements, with the following major variations:

1. The analysis did not include food safety hazards reasonably likely to occur.
2. The HACCP plan did not specify critical limits, monitoring procedures and the monitoring frequencies performed for each CCP adequately.
3. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequency with which these procedures will be performed. Neither establishment personnel nor GOA inspection officials were performing adequate ongoing verification activities of the HACCP program.
4. Corrective actions to be followed in response to a deviation from a critical limit were not addressed adequately in the written HACCP plan.
5. Documentation of records for the HACCP program were not adequately maintained.
6. The zero-tolerance policy for visible fecal material on carcasses was not enforced by either establishment or GOA inspection officials, and no monitoring record was maintained to verify this activity.
7. Both establishment and inspection personnel had been unaware of the requirement for a pre-shipment review of all documentation pertaining to the monitoring of critical limits were met and, if appropriate, documentation that corrective actions were taken, including the proper disposition of the product for each shipment eligible for export to the U.S. The auditor explained the

requirements for pre-shipment review in detail. GOA meat inspection officials indicated their intention to implement this requirement promptly.

GOA inspection and establishment officials agreed to take corrective actions for the discrepancies identified in the HACCP programs.

Testing for Generic *E. coli*

Austria has adopted the FSIS regulatory requirements for generic *E. coli* testing with the exception of the following equivalent measures:

1. Sample Collector: Private laboratory personnel take samples but not the government as stated in the criteria used for equivalence decisions for use of government employees in lieu of establishment employees:
2. The carcass selection was not being done randomly.
3. Establishment 25-A was using sponging method for sampling carcasses for *E.coli* and excision samples criteria was being used for the evaluation of the test results.

Additionally, establishments had adequate controls in place to prevent meat products intended for Austrian domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

Except as noted below, the Austrian meat inspection controls [ante-and post-mortem inspection procedures and dispositions, and inspection samples, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and inspection supervision and documentation and the importation of only eligible meat products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Establishment 25-A audited was required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

The *Salmonella* testing program was audited and found to meet the basic FSIS regulatory requirements. GOA inspection service has implemented *Salmonella* testing (one sample per month).

Austria has adopted the FSIS regulatory requirements for *Salmonella* testing with exception of the following equivalent measures:

Sample Collector: Private laboratory personnel take samples. The criteria used for equivalence decisions for use of establishment employees in lieu of government employees:

- *Salmonella* samples were analyzed
- The government uses test results to monitor establishment performance over time.
- The government takes immediate action any time an establishment fails to meet a *Salmonella* performance standard.

LABORATORIES: Private Laboratories. The criteria used for equivalence decisions for the use of private laboratories in lieu of government laboratories are:

- The laboratory is accredited/approved by the government
- The laboratory has properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
- Results of analyses are reported to the government or simultaneously to the government and the establishment.

ENFORCEMENT STRATEGY: GOA inspection service has no regulation to enforce noncompliance when they determine that an establishment has not met the *Salmonella* standard. GOA inspection officials indicated that they would trace back the origin of the animal to the farm even if one *Salmonella* sample is found positive.

Species Verification Testing

At the time of this audit, Austria was exempt from the species verification testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Monthly Reviews

These reviews were being performed by Dr. Fridrich Mayr, Austria's equivalent of Area Supervisors. He was a veterinarian with at least 10 years of experience.

The internal review program was applied equally to both export and non-export establishments. Internal review visits were both announced and not announced in advance, and were conducted, at times, by individuals and at other times by a team of reviewers including a veterinarian from the State, at least once monthly. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central office of the Veterinary Service in Vienna.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, a commission is empowered to conduct an in-depth review, and the results are reported to Dr. Roitner, Official Veterinarian for the State of Oberosterreich; Dr. Peter Vitus Stangl, Head of Department of Veterinary Services- Meat Hygiene/Residue Control; and Dr. Marina Mikula, Veterinary Medical Doctor, for evaluation; they formulate a plan for corrective actions and preventive measures.

After observing the internal reviewers' activities in the field, the auditor was confident in their professionalism, thoroughness, and knowledge of U.S. requirements, and in the effectiveness of Austria's internal review program as a whole.

Enforcement Activities

Controls were in place to ensure adequate export product identification, inspector verification, export certificates, a single standard of control throughout the establishments, inspection supervision as required, and adequate controls for security items, shipment security, species verification, and products entering the establishments from outside sources. GOA inspection service has no regulation to enforce noncompliance when they determine that an establishment has not met the *Salmonella* standard. GOA inspection officials indicated that they would trace back the origin of the animal to the farm even if one *Salmonella* sample is found positive.

I did not have time to get information in detail for both administrative and criminal enforcement of laws and regulations.

Exit Meetings

An exit meeting was conducted in the inspection office of Establishment 25-A on March 7, 2000. The Austrian participants were Dr. Werner Roitner, Regional Supervisor; Dr. Friedrich Mayer, Manager and Dr. Faizur R. Choudry, International Audit Staff Officer.

The individual audit findings including the HACCP program were discussed, as enumerated in the body of this report. The Austrian officials agreed to take the necessary steps to ensure that corrective actions and preventive measures, as promised during the audit and exit meetings in the establishment, would be implemented.

The following major deficiencies were discussed:

1. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequency with which these procedures will be performed. Neither establishment nor GOA inspection officials

were performing adequate ongoing verification activities of HACCP program, in Establishment 25-A.

2. Monitoring frequencies and corrective actions to be followed in response to a deviation from a critical limit are not addressed adequately in the written HACCP plan.
3. The zero-tolerance policy for visible fecal material on carcass was not enforced by either establishment or GOA inspection officials, and no monitoring record was maintained to verify this activity.
4. Both establishment and inspection personnel had been unaware of the requirement for a pre-shipment review of all documentation pertaining to the monitoring of critical limits and, if appropriate, documentation that corrective actions were taken, including the proper disposition of product, for each shipment eligible for export to the U.S. The auditor explained the requirements for this pre-shipment review in detail and GOA meat inspection officials indicated they intend to implement this requirement promptly.
5. Condemned product controls: condemned carcasses, part of carcasses and other products were not slashed and denatured prior to leaving the Establishment 25-A. Neither establishment nor GOA inspection officials took corrective actions.
6. The daily pre-operational and operational SSOP records did not reflect the actual sanitary conditions observed at the time of the review.

Mr. Walter Krucsay, Agricultural specialist, U.S. Embassy, Vienna was briefed per telephone regarding the delisting of Establishment 25-A on March 7, 2000.

CONCLUSION

Establishment 25-A was found to have ineffective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. One establishment was audited and was evaluated as unacceptable. The deficiencies encountered during the on-site establishment audit, in Establishments 25-A, were not adequately addressed to the auditor's satisfaction. The GOA meat inspection officials reinforced the assurances made by field personnel during and at the conclusions of the on-site audit of Establishment 25-A and stated that they would ensure prompt compliance.

The major deficiencies were the following:

1. The HACCP plan did not state adequately the procedures that the establishment will use to verify that the plan is being effectively implemented and the frequency with which these procedures will be performed. Neither establishment nor GOA inspection officials

were performing adequate ongoing verification activities of HACCP program, in Establishment 25-A.

2. Monitoring frequencies and corrective actions to be followed in response to a deviation from a critical limit are not addressed adequately in the written HACCP plan.
3. The zero-tolerance policy for visible fecal material on carcass was not enforced by either establishment or GOA inspection officials, and no monitoring record was maintained to verify this activity.
4. Both establishment and inspection personnel had been unaware of the requirement for a pre-shipment review of all documentation pertaining to the monitoring of critical limits and, if appropriate, documentation that corrective actions were taken, including the proper disposition of product, for each shipment eligible for export to the U.S. The auditor explained the requirements for this pre-shipment review in detail and GOA meat inspection officials indicated to implement this requirement promptly.
5. Condemned product controls: condemned carcasses, part of carcasses and other products were not slashed and denatured prior to leaving the Establishment 25-A. Neither establishment nor GOA inspection officials took corrective actions.
6. The daily pre-operational and operational SSOP records did not reflect the actual sanitary conditions observed at the time of the review in Establishment 25-A.

Dr. Faizur R Choudry
International Audit Staff Officer

(signed) Dr. Faizur R. Choudry

ATTACHMENTS

- A. Data collection instrument for SSOPs
- B. Data collection instrument for HACCP programs
- C. Data collection instrument for *E. coli* testing.
- D. Data collection instrument for *Salmonella* testing
- E. Laboratory audit form
- F. Individual Foreign Establishment Audit Forms
- G. Written Foreign Country's Response to the Draft Final Audit Report (when it becomes available)
- H. FSIS Response(s) to Foreign Country Comments (when it becomes available)

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used included the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1. Written program addressed	2. Pre-op sanitation addressed	3. Oper. Sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. Identified	7. Documentation done daily	8. Dated and signed
025-A	√	√	√	√	√	√	√1	√

1. The daily pre-operational and operational SSOP records did not reflect the actual sanitary conditions observed in the establishment.

Data Collection Instrument for Generic *E. coli* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a written procedure for testing for generic *E. coli*.
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1. Written procedure	2. Sampler designated	3. Sampling location given	4. Predominant species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
025-A	√	√	√	√	√	√	√1	√	√2	√

1. The carcass selection was not being done randomly.
2. Establishment 025-A, that the method for excising carcasses for *E. coli* sampling was used.

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. (except Est. TIF-119) was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. *The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.*
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or does not include records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. act's are described	9. Plan validated	10. Adequate verific. procedures	11. Adequate documentation	12. Dated and signed
025-A	√	√	√1	√	√	√	√2	√3	√	√4	√5	√

1. The analysis did not include food safety hazards reasonably likely to occur
2. The HACCP plan did not specify critical limits, monitoring procedures and the monitoring frequencies performed for each CCP adequately.
3. Corrective actions to be followed in response to a deviation from a critical limit are not addressed adequately in the written HACCP plan
4. Verification procedures and the frequencies with which these procedures will be performed, were not addressed adequately in the written HACCP plan.
5. Documentation of records for HACCP program was not adequately maintained.

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. *Salmonella* testing is being done in this establishment.
2. Carcasses are being sampled.
3. Ground product is being sampled.
4. The samples are being taken randomly.
5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.
6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	<i>1. Testing as required</i>	<i>2. Carcasses are sampled</i>	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
025-A	√	√	N/A	√	√	√



Questions for Auditing Laboratories

Attachment-E

General

Name & location of lab: ***Institute for Bio-Analysis and Hygiene, Perg, Upper Austria***

Private or gov't lab? ***Private***

How & when was accreditation obtained? ***1997, accredited by the Human Food Department of Federal Chancellery.***

How & how often is accreditation maintained? ***Ministry of Economic Affairs Accreditation Department. Minimum once and maximum twice a year.***

When and how is payment for analysis provided? ***After reporting***

Are results released before payment is received? ***Yes***

Methodology for HACCP Salmonella samples (regulatory labs)

Does this lab analyze HACCP Salmonella samples? ***Yes***

How are HACCP Salmonella samples received & recorded? ***Samples are collected and brought to the laboratory by the laboratory personnel.***

Are HACCP Salmonella samples analyzed on the day of receipt? ***No (within one week).***

What method(s) is used for HACCP Salmonella samples? ***AOAC ISO 6575***

Is it a qualitative method (i.e. +/- result)? ***Yes***

Are HACCP ground beef samples analyzed for Salmonella? ***No***

What is the size of the ground beef test portion? ***N/A***

What buffer is used: ***Buffered Peptone Water***

Sponge samples for Salmonella? ***Yes***

Poultry rinsates for Salmonella? ***N/A***

Salmonella ground beef sample homogenates? ***N/A***

Analytical controls are employed for each set of samples. ***Yes***

How are HACCP Salmonella results expressed? ***Positive or negative***

How are HACCP *Salmonella* results recorded: **log book**

Data sheets/work sheets?

and/or Log books?

How and to whom are HACCP *Salmonella* results reported? **By mail to establishment management**

Are "check" samples periodically used to test the proficiency of the lab and analysts for *Salmonella* testing? **Yes**

Methodology for HACCP generic *E. coli* samples (in-plant or other private labs)

Does this lab analyze HACCP generic *E. coli* samples? **Yes**

How are HACCP *E. coli* samples received & recorded? **Samples are collected and brought by the laboratory personal.**

Are HACCP *E. coli* samples analyzed on the day of receipt? **No - within one week**

What method is used for HACCP generic *E. coli* samples? **AOAC ISO 6575**

Is it a quantitative method? **Yes**

What buffer is used: **Buffered Peptone Water**

E. coli sponge samples? **Yes**

Poultry rinsates for generic *E. coli*? **N/A**

Are analytical controls are employed for each set of samples? **Yes**

How are HACCP *E. coli* results calculated and/or expressed? **Quantitative**

How are *E. coli* results recorded: **Log books**

Data sheets/work sheets?

Log books?

How and to whom are HACCP *E. coli* results reported? **By mail to establishment management**

Are "check" samples periodically used to test the proficiency of the lab and analysts for generic *E. coli* testing? **Yes**

FOREIGN PLANT REVIEW FORM

REVIEW DATE

3/7/2000

ESTABLISHMENT NO. AND NAME

Rudolf Grossfurner
Est. 25-A

CITY

St. Martin

COUNTRY

AUSTRIA

NAME OF REVIEWER

Dr. Faizur R. Choudry, DVM.

NAME OF FOREIGN OFFICIAL

Dr. Werner Roitner, Regional Supervisor

EVALUATION

Acceptable

Acceptable/
Re-review

Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable

M = Marginally Acceptable

U = Unacceptable

N = Not Reviewed

O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 U	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 M	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 U	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 U	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 M	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 U	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 O
Over-product ceilings	17 U	Returned and rework product	45 A	Inspector verification	73 O
Over-product equipment	18 U	3. RESIDUE CONTROL		Export certificates	74 O
Product contact equipment	19 U	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 N
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 U
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 N
Personal dress and habits	25 M	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 O		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	3/7/2000	Rudolf Grossfurtner Est. 25-A	St. Martin
			COUNTRY
			AUSTRIA
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. Faizur R. Choudry, DVM.	Dr. Werner Roitner, Regional Supervisor	<input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/Re-review <input checked="" type="checkbox"/> Unacceptable	

COMMENTS:

11. Light was inadequate at the viscera inspection and carcass postmortem inspection stations in the hog slaughter room. Establishment officials ordered prompt correction.

17. Dripping condensate from pipes, ceilings, and refrigeration units that were not cleaned/sanitized daily, was falling onto carcasses in the coolers. Old pieces of meat, blood, fat, mold, dirt, and black stains were observed on ceilings in the slaughter, boning, and offal rooms and coolers. Neither establishment nor GOA officials took corrective actions.

18. Overhead beams, pipes, and vent screens were observed with accumulations of fat, dirt and dust in the slaughter, boning, and offal rooms and coolers. A roller conveyor for boxed edible product and cleaned edible product containers was found with pieces of fat, meat, dirt and dust, and water was dripping from containers onto the edible product underneath in the boning room and one carcass cooler. Neither establishment nor GOA officials took corrective actions.

19. Numerous plastic cutting/boning boards in the boning and offal rooms were found with deep scoring and were extensively deteriorated

25. Personnel in the boning, offal and slaughter rooms were observed with worn out and deteriorated aprons.

28. Blood, fat, and fecal material were found on the automatic hog viscera conveyor after washing/sanitizing in the slaughter room. Neither establishment nor GOA officials took corrective actions.

33,34, 35. The daily pre-operational and operational SSOP records did not reflect the actual sanitary conditions observed in the establishment. No pre-operational and operational SSOP record and process verification was performed by the GOA inspection officials.

43. Condemned carcasses, part of carcasses and other products were not slashed and denatured prior to leaving the establishment.

80. Because of gross product contamination and lack of condemned product and inspections controls, the status of this establishment is not equal to the U.S. program. All the deficiencies were discussed with GOA inspection officials and they agreed to remove Establishment 25-A from the list of establishment eligible to export meat and meat products to the United States, effective March 7, 2000. (This establishment was newly listed for U.S. export on February 28, 2000.



**BUNDESMINISTERIUM
FÜR SOZIALE SICHERHEIT UND GENERATIONEN**

**Mark G. Manis, Director,
International Policy Division,
OPPDE, FSIS,
Room 4434, South Building,
14th and Independence Avenue, SW,
Washington, DC 20250-3700
USA**

GZ: 39.162/17-IX/A/3/00

Wien, 27. Dezember 2000

Dear Dr. Manis:

The Austrian Veterinary Services of the Federal Ministry of Social Security and Generations thank for the reports of the audit which were conducted between November 19 through November 26, 1999 and from March 6 through March 7, 2000.

The Veterinary Services would like to give some remarks to the report:

Laboratory Audit (page 7 and Annex)

The name of the laboratory which was audited on November 25, 1999 has changed, since September 1, 2000, the new name is **Federal Veterinary Institute Mödling (former name: Federal Institute for the Control of Animal Infectious Diseases in Mödling).**

/2

This laboratory is not a private laboratory, it is designated officially according to paragraph 27 of the Meat Hygiene Act (FLG No. 522/1982 as amended by FLG No.1/66/1998). This laboratory has different departments, one of them is responsible for microbiological investigations (e.g. Salmonella testing), the chemical department is used to analyze residues (residue control program).

Recordkeeping: The results of the quality control samples will be recorded to EN ISO/IEC 17052, Chapter 5.9 (the results of residue analyzes are stored databased and on paper). This laboratory is in the stage of accreditation according to EN 17052.

Recovery rate: the recovery rates of Chloramphenicol and DES fulfill the international standards.

Establishments Operations

Deficiencies which were observed during the audit in Establishment 2 and 8: Some of them were corrected immediately and in those cases where the corrections were scheduled, the deficiencies and incompliances were noted in order to correct them in time.

The Provincial government of Upper Austria reported that in both establishments all necessary corrective actions were set.

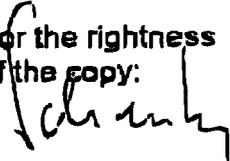
Establishment 25 A was delisted because of major Incompliances and deficiencies. The letter concerning this information was sent to the International Policy Division officially on March 16, 2000 (GZ 39.182/6-1/A/3/2000).

Boneless meat reinspection: Article 9 subparagraph 4 of Fresh Meat Hygiene Regulation (FLG No. 398/1994 as amended by FLG No. 519/1996) determines that fresh meat entering the cutting room has to be checked and if necessary to be trimmed before cutting. The workstation for this task must be equipped with suitable facilities and adequate lighting.

HACCP: HACCP system in Est. 2 is now fully implemented.

For the Federal Minister:
Dr. WEBER

For the rightness
of the copy:

A handwritten signature in black ink, appearing to be 'Schulz', written over the text 'For the rightness of the copy:'.