



United States Department of Agriculture

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Food Safety and  
Inspection Service

March 22, 2024

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Avenue, SW.  
Washington, D.C.  
20250

Madam Guo Xueyan  
Director General  
Import and Export Food Safety Bureau  
The General Administration of Custom of the People's Republic of China  
(GACC)  
The People's Republic of China (PRC)

Dear Madam Guo,

The United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) conducted an onsite verification audit of the PRC's poultry and Siluriformes fish inspection system September 11–28, 2023. Enclosed is a copy of the final audit report. The comments received from the Government of the PRC are included as an attachment to the report.

Sincerely,

**MARGARET  
BURNS RATH**

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Margaret Burns Rath, JD, MPH  
Acting International Coordination Executive  
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Enclosure

FINAL REPORT OF AN AUDIT CONDUCTED IN

THE PEOPLE'S REPUBLIC OF CHINA

SEPTEMBER 11–28, 2023

EVALUATING THE FOOD SAFETY SYSTEM GOVERNING  
PROCESSED POULTRY AND RAW SILURIFORMES FISH AND FISH  
PRODUCTS

EXPORTED TO THE UNITED STATES OF AMERICA

March 18, 2024

Food Safety and Inspection Service  
U.S. Department of Agriculture

## Executive Summary

This report describes the outcome of an onsite equivalence verification audit of the People's Republic of China (PRC) conducted by the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) from September 11–28, 2023. The purpose of the audit was to verify whether the PRC's food safety inspection system governing processed (ready-to-eat) poultry and raw Siluriformes fish and fish products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and properly labeled and packaged. The PRC currently exports ready-to-eat (RTE) poultry and raw intact and raw non-intact Siluriformes fish and fish products to the United States.

The audit focused on six system equivalence components: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation and Product Standards and Labeling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Point (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

The FSIS auditors concluded that the PRC's processed poultry and raw Siluriformes fish and fish products food safety inspection system is organized to provide ultimate control, supervision, and enforcement of regulatory requirements. The Central Competent Authority (CCA) has required that establishments certified as eligible to export products to the United States implement sanitation requirements and a HACCP system designed to improve the safety of their products. In addition, the CCA has implemented official microbiological and chemical residue testing programs to verify its system. An analysis of each component did not identify any systemic findings representing an immediate threat to public health.

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## I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture (USDA) conducted an onsite audit of the People’s Republic of China’s (PRC) food safety inspection system September 11–28, 2023. The audit began with an entrance meeting on September 11, 2023, in Beijing, China, during which the FSIS auditors discussed the audit objective, scope, and methodology with representatives from the Central Competent Authority (CCA) – General Administration of China Customs (GACC). Representatives from GACC accompanied the FSIS auditors throughout the entire audit. The audit concluded with an exit meeting on September 28, 2023.

## II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit objective was to verify whether the food safety inspection system governing processed poultry and raw Siluriformes fish and fish products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and properly labeled and packaged. The PRC is eligible to export the following categories of products to the United States:

<b>Process Category</b>	<b>Product Category</b>	<b>Eligible Products<sup>1</sup></b>
Raw – Non-Intact	Raw Ground Comminuted or Otherwise Non-Intact Siluriformes	Siluriformes - All Products Eligible
Raw – Intact	Raw Intact Meat - Other	Siluriformes - All Products Eligible
Fully Cooked - Not Shelf Stable	Ready-to-Eat (RTE) Fully cooked Poultry	Chicken and Duck - All Products Eligible
Fully Cooked - Not Shelf Stable	RTE Poultry Fully cooked Without Subsequent Exposure to the Environment	Chicken and Duck - All Products Eligible

The USDA’s Animal and Plant Health Inspection Service recognizes the PRC as affected with highly pathogenic avian influenza and Newcastle disease. Consequently, the PRC is eligible to export only processed ready-to-eat (RTE) poultry products that meet the requirements described in Title 9 of the Code of Federal Regulations (9 CFR) 94.6(b)(4).

Prior to the onsite equivalence verification audit, FSIS reviewed and analyzed the PRC’s Self-Reporting Tool (SRT) responses and supporting documentation, including official chemical residue and microbiological sampling plans and results. During the audit, the FSIS auditors conducted interviews, reviewed records, and made observations to verify whether the PRC’s food safety inspection system governing processed poultry and raw Siluriformes fish and fish products is being implemented as documented in the country’s SRT responses and supporting documentation.

<sup>1</sup> All source Siluriformes fish and poultry used to produce products must originate from eligible countries and establishments certified to export to the United States.

FSIS applied a risk-based procedure that included an analysis of country performance within six equivalence components, product types and volumes, frequency of prior audit-related site visits, point-of-entry (POE) reinspection and testing results, specific oversight activities of government offices, and testing capacities of laboratories. The review process included an analysis of data collected by FSIS over a 3-year period, in addition to information obtained directly from GACC through the SRT.

Determinations concerning program effectiveness focused on performance within the following six components upon which system equivalence is based: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation and Product Standards and Labeling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Point (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

The FSIS auditors reviewed administrative functions at GACC headquarters, two customs offices, ten local inspection offices within the establishments, and three Siluriformes fish farms. The FSIS auditors evaluated the implementation of control systems in place that ensure the national system of inspection, verification, and enforcement is being implemented as documented in the country’s SRT responses and supporting documentation.

The PRC is currently eligible to export RTE poultry products to the United States provided raw poultry is sourced from countries that have been determined by FSIS to have an equivalent poultry slaughter inspection system or from establishments within the PRC that are certified to produce raw poultry as source material for further processing. The FSIS auditors selected a sample of 10 establishments from a total of 14 establishments, certified to export to the United States. This included one poultry slaughter establishment (certified to provide raw poultry for further processing), one poultry processing establishment, and eight Siluriformes fish slaughter and raw processing establishments. During the establishment visits, the FSIS auditors paid particular attention to the extent to which industry and government interacted to control hazards and prevent noncompliance that threatens food safety. The FSIS auditors assessed the GACC’s ability to provide oversight through supervisory reviews conducted in accordance with FSIS equivalence requirements for foreign food safety inspection systems outlined in 9 CFR 381.196 for poultry and 9 CFR 557.2 for Siluriformes fish and fish products, which is consistent with requirements in 9 CFR 327.2.

The FSIS auditors also visited one microbiology and two chemical residue laboratories to verify that these laboratories can provide adequate technical support to the food safety inspection system.

Competent Authority Visits		#	Locations
Competent Authority	Central	1	<ul style="list-style-type: none"> <li>GACC headquarters, Beijing</li> </ul>
	Customs Offices	2	<ul style="list-style-type: none"> <li>Chuzhou Customs (Hefei subdivision), Hefei</li> <li>Changsha Customs, Changsha</li> </ul>
Laboratories		3	<ul style="list-style-type: none"> <li>Hefei Customs Technical center microbiological laboratory, Heifei</li> </ul>

		<ul style="list-style-type: none"> <li>• Hubei Inspection and Quarantine Technology Center, Chemical Residue Division, Wuhan</li> <li>• Guangzhou Customs Technical Center, Chemical Residue Division, Guangzhou</li> </ul>
Poultry slaughter establishment	1	<ul style="list-style-type: none"> <li>• Establishment No. 3400/03042, SV Foods (Anhui) Co. Ltd, Chuzhou</li> </ul>
Poultry processing establishment	1	<ul style="list-style-type: none"> <li>• Establishment No. 4100/03078, Yongda Meiyuan Food Co. Ltd, Hebi</li> </ul>
Siluriformes fish slaughter and raw processing establishments	8	<ul style="list-style-type: none"> <li>• Establishment No. 3400/02027, Anhui Fuhuang Sungem Foodstuff Group Co. Ltd, Chaohu</li> <li>• Establishment No. 4200/02020, Deyan Aquatic Products and Food Co. Ltd, Huanghu</li> <li>• Establishment No. 4200/02058, Hubei Shengli Foodstuff Co. Ltd, Xiantao</li> <li>• Establishment No. 4300/02022, Guolian Yiyang Food Co. Ltd, Yiyang</li> <li>• Establishment No. 3200/02512, Jiangsu Haitian Sea-Beach Aquatic Foods Co. Ltd, Jiangsu</li> <li>• Establishment No. 4400/02367, Maoming Heng Seafood Co. Ltd, Maoming</li> <li>• Establishment No. 4400/02223, Zhenye Aquatic Inc, Guangdong</li> <li>• Establishment No. 4500/02050, Gain Ocean Food Co. Ltd, Beihai</li> </ul>
Siluriformes fish farms	3	<ul style="list-style-type: none"> <li>• Establishment No. 4200/02020, Deyan Aquatic Products and Food Co. Ltd, Honghu</li> <li>• Establishment No. 3200/02512, Jiangsu Haitian Sea-Beach Aquatic Foods Co. Ltd, Jiangsu</li> <li>• Establishment No. 4500/02050, Gain Ocean Food Co. Ltd, Beihai</li> </ul>

FSIS performed the audit to verify that the food safety inspection systems meet requirements equivalent to those under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 United States Code (U.S.C.) Section 601 et seq.);
- The Siluriformes fish and fish products inspection regulations (9 CFR parts 530-561);
- The Poultry Products Inspection Act (21 U.S.C. Section 451 et seq.); and
- The Poultry Products Inspection Regulations (9 CFR part 381).

The audit standards applied during the review of the PRC’s food safety inspection systems for processed poultry and raw Siluriformes fish and fish products included: (1) all applicable legislation originally determined by FSIS as equivalent as part of the initial review process, and (2) any subsequent equivalence determinations that have been made by FSIS under provisions of

the World Trade Organization's Agreement on the Application of Sanitary and Phytosanitary Measures.

### **III. BACKGROUND**

From May 1, 2020, to April 30, 2023, FSIS import inspectors performed 100 percent reinspection for labeling and certification on 50,452,080 pounds of raw Siluriformes fish and fish products and 345,116 pounds of RTE poultry products from the PRC. Of these amounts, additional types of inspection were performed on 7,498,291 pounds of raw Siluriformes fish and fish products and 304,688 pounds of RTE poultry. These additional types of inspection included physical examination, chemical residue analysis, and testing for microbiological pathogens (*Listeria monocytogenes (Lm)* and *Salmonella* in RTE poultry products). As a result of this additional testing 332,250 pounds of raw Siluriformes fish and fish products were rejected for issues related to public health.

An additional 51,429 pounds of raw Siluriformes fish and fish products and 14,909 pounds of RTE poultry products were refused entry for other issues not related to public health including shipping damage, labeling or other miscellaneous issues.

FSIS conducted the previous audit of the PRC's food safety inspection system remotely July 26–September 7, 2021, and did not identify any systemic findings representing an immediate threat to public health.

The most recent FSIS final audit reports for the PRC's food safety inspection system are available on the FSIS website at: [www.fsis.usda.gov/foreign-audit-reports](http://www.fsis.usda.gov/foreign-audit-reports).

### **IV. COMPONENT ONE: GOVERNMENT OVERSIGHT (e.g., ORGANIZATION AND ADMINISTRATION)**

The first equivalence component the FSIS auditors reviewed was Government Oversight. FSIS import regulations require the foreign food safety inspection system to be organized by the national government in such a manner as to provide ultimate control and supervision over all official inspection activities; ensure the uniform enforcement of requisite laws; provide sufficient administrative technical support; and assign competent qualified inspection personnel at establishments where products are prepared for export to the United States.

GACC, an independent administrative institution at the ministerial level directly under the State Council, is the CCA. The FSIS auditors verified that there have been no major changes in GACC's organizational structure governing both poultry and Siluriformes fish and fish products since the previous FSIS audit conducted remotely in 2021. GACC is responsible for formulation of inspection policies related to the PRC's supervision system of poultry and Siluriformes fish and fish products eligible for export to the United States. GACC oversees the administrative functions at the national customs, entry-exit commodity inspection, entry-exit health quarantine, entry-exit animal and plant quarantine, and safety of imported-exported products. The PRC's food safety inspection system operates at the central, provincial, and local levels. At the central level, the Import and Export Food Safety Bureau (FSB) is in charge of managing national control



over the food safety of imported and exported products, including Siluriformes fish and fish products and poultry products intended for export to the United States. At the provincial level, there are 42 Customs Administration (CA) offices under direct administration of GACC that provide supervision over subordinating local customs offices situated throughout the country. At the local level, the Import and Export Food Safety Divisions of local CA offices are responsible for providing inspection coverage at the registered aquaculture farms, Siluriformes fish slaughter and raw processing establishments, and poultry slaughter and processing establishments certified as eligible to export to the United States.

The FSIS auditors verified that GACC's Department of Enterprise Management and Audit-based Control has the legal authority and responsibility to certify or delist any establishment that has requested to export products to the United States. GACC may revoke an establishment export certification when the establishment is not meeting requirements of the PRC or the importing country. During the planning phases of this audit, GACC informed FSIS that the number of establishments certified as eligible to export Siluriformes fish or fish products to the United States had been reduced from 16 to 10 establishments.

The FSIS auditors verified that all inspection personnel are permanent government employees who are hired and paid by the national government. The FSIS auditors verified that government inspection personnel have appropriate educational credentials to conduct inspection activities at the audited establishments. Government inspection personnel in certified Siluriformes fish establishments are required to have a professional degree in veterinary science, aquatic products, or food science. These individuals are responsible for conducting inspection verification activities at the registered aquaculture farms and slaughter and raw processing establishments certified to export Siluriformes fish or fish products to the United States. Government inspection personnel in certified poultry establishments are required to have a professional degree in veterinary science, food science, public health science, or veterinary assistant degree. These individuals are responsible for conducting inspection verification activities at the certified poultry slaughter and processing establishments. GACC's inspection and verification activities are further supported by government inspection personnel from the Ministry of Agriculture and Rural Affairs (MARA), who are responsible for the quality and safety management of aquaculture farms and performing ante-mortem and post-mortem inspection examination of poultry at certified establishments. In addition, MARA is responsible for the national aquatic disease prevention and for the control of all registered aquaculture farms producing fish for human consumption.

The FSIS auditors reviewed GACC's training schedules and inspectors' training records since the previous FSIS audit in 2021. This included training of government inspection personnel in a Siluriformes fish slaughter and processing establishment newly certified to export to the United States. The training materials included enforcement of regulatory requirements, verification of good aquaculture practices, good manufacturing practices (GMP), good commercial practices (GCP), HACCP systems, sanitation, traceability, labeling, poultry and fish products standards, and export certification. The FSIS auditors verified that GACC has a mechanism in place to conduct performance appraisals of government inspection personnel at least annually to assess their knowledge, skills, and abilities. The annual assessment includes interviews, review of

inspection-generated records, and direct observation of government inspection personnel while conducting their assigned inspection activities.

The FSIS auditors verified that GACC has provided instructions to its inspection personnel to identify and document any noncompliance findings on the Noncompliance Traceability Report (NCTR). The FSIS auditors reviewed inspection-generated NCTRs and verified that government inspection personnel had identified and documented noncompliance findings in NCTRs in accordance with GACC's requirements. Government inspection personnel closed the NCTR after verifying the adequacy and effectiveness of the establishment's preventive and corrective actions. The FSIS auditors confirmed that there have not been any elevated enforcement actions associated with certified establishments since the previous FSIS audit in 2021.

The FSIS auditors verified that GACC has a regulatory definition for adulteration and misbranding. GACC requires certified establishments to maintain recall procedures and traceability records sufficient to conduct traceback activities. The FSIS auditors verified that there have not been any product recalls of exported poultry or Siluriformes fish and fish products since the previous FSIS audit in 2021.

The FSIS auditors verified that the local CA government inspection personnel conduct inspection of aquaculture farms at least annually. This annual inspection includes review of the aquaculture farm's traceability program and production records, as well as hands-on inspection verification of the aquaculture farm's sanitation condition; inventory of chemical and veterinary drugs consumption; and collection of water, feed, and fish samples for chemical residue analysis. At the establishment level, the FSIS auditors verified that the establishment's production process can be traced back to the source materials.

The FSIS auditors verified that certified Siluriformes fish slaughter and raw processing establishments do not receive Siluriformes fish from any other country and solely utilize their own contracted, registered aquaculture farms as source materials for products intended for export to the United States. The FSIS auditors also verified that the raw materials for all processed poultry currently exported to the United States are derived exclusively from slaughter establishments within the United States.

The FSIS auditors reviewed export certification documentation for certified Siluriformes fish and poultry establishments, including documents generated by the establishment's employees and by government inspection personnel. The establishment's documentation included the identification of the source materials, registered aquaculture farms, species (for Siluriformes fish), country of destination, pre-shipment review record including sanitation and HACCP records, and microbiological and chemical residue sampling results associated with the production lot being exported. The FSIS auditors confirmed that GACC maintains a test and hold policy within the context of its government chemical residue and microbiological verification testing programs. Prior to issuance of the export certificate, signing officials routinely verify results of both establishment and official government microbiological and chemical residue testing, product labeling, and traceability documents.

The China National Accreditation Service for Conformity Assessment (CNAS) operates the national accreditation system for certifying laboratories that test official government verification samples of products intended for export to the United States. Provincial CA offices oversee government laboratories within each province. Government inspection personnel at certified establishments collect and send required samples to assigned government laboratories within their respective province for analysis. The FSIS auditors visited Hubei Inspection and Quarantine Technology Center and Guangzhou Customs Technical Center. These are both official government laboratories that conduct chemical residue testing as part of the national chemical residue control plan. In addition, the FSIS auditors visited Hefei Customs Technical Center which is a government laboratory that conducts microbiological testing on poultry products intended for export to the United States. The FSIS audit's scope in each laboratory included review of sample receipt, timely analysis, analytical methodologies, analytical controls, analyst qualifications and trainings, proficiency testing, and recording and reporting of results. The FSIS auditors reviewed the most recent accreditation audits, the laboratories' staff training records, and the results of their proficiency testing. The FSIS auditors verified that CNAS audits these government laboratories against the standards laid out in Guobiao/Tuǐjiàn (GB/T) 27025-2019 to verify conformance with International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025 standards.

FSIS auditors verified that GACC organizes and administers its food safety inspection system and that government inspection personnel enforce laws and regulations governing production and export of raw Siluriformes fish and fish products and processed poultry at establishments certified to export to the United States.

**V. COMPONENT TWO: GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (e.g., INSPECTION SYSTEM OPERATION AND PRODUCT STANDARDS AND LABELING)**

The second equivalence component the FSIS auditors reviewed was Government Statutory Authority and Food Safety and Other Consumer Protection Regulations. The system is to provide for good commercial practices in poultry; ante-mortem inspection of poultry; post-mortem inspection of every poultry carcass and its parts; complete separation of source materials for poultry and Siluriformes fish and fish products at certified establishments eligible to export to the United States; controls over condemned materials; controls over establishment construction, facilities, and equipment; at least once per shift inspection during processing operations; and periodic supervisory visits to official establishments.

The FSIS auditors verified that GACC requires that establishments certified to export or provide source materials for products exported to the United States follow the regulations on animal welfare during primary production, transport, and slaughter. This includes requirements to ensure that live poultry are slaughtered in a manner that will result in thorough bleeding of the poultry carcass and will ensure that breathing has stopped before scalding. Government inspection personnel conduct ante-mortem inspection at certified establishments prior to slaughter. Poultry ante-mortem inspection includes both document review and clinical examinations of live poultry in accordance with GACC's Poultry Inspection and Quarantine and Supervision Handbook for

Poultry Exported to the United States (hereafter referred to as The Poultry Handbook). GACC requires that live poultry originate from registered farms accompanied by a Certificate of Passing the Quarantine of Origin of Animals. The FSIS auditors observed government inspection personnel performing ante-mortem inspection on live poultry. Government inspection personnel conduct post-mortem inspection at certified poultry establishments in accordance with GACC's requirements. The FSIS auditors directly observed government inspection personnel verify that proper presentation, examination, and disposition of all carcasses and parts are being implemented when a certified establishment intends to export to the United States. The FSIS auditors did not identify any concerns with the implementation of post-mortem inspection procedures.

The FSIS auditors verified that the audited establishments have a system in place to distinguish between eligible poultry and Siluriformes fish and fish products intended for export to the United States from products destined for other markets. This includes complete separation of the entire production process (e.g., receiving, processing, and storage) by time and space through a lot management system for product intended for export to the United States. In addition, the establishments are required to apply a label to clearly indicate that the product is only for export to the United States. The FSIS auditors confirmed that government inspection personnel are verifying the proper implementation of the establishment's procedures and did not identify any concerns.

The FSIS auditors verified that GACC requires certified establishments to separate and appropriately dispose of condemned or inedible poultry or Siluriformes fish or fish products. This included inspection verification of certified establishments' procedures to identify, separate, and dispose of dead or abnormal Siluriformes fish from the receiving of live fish to packaging stations. The FSIS auditors confirmed that government inspection personnel conduct inspection at least once per production shift to verify proper collection, segregation, storage in designated containers and rooms, and disposal of condemned poultry or Siluriformes fish or fish products by establishments in accordance with GACC's requirements.

The FSIS auditors reviewed in-plant inspection-generated records and observed their performance while conducting inspection verification of the GACC requirements for HACCP, sanitation, chemical residue control, condemned material, export certification, traceability, labeling, and recall. These verification activities cover the entire production shift and include the receiving of raw materials, processing, storage, packaging, and export of products to the United States. Government inspection personnel document the results of their daily verification procedures on a standard form, the Official Inspection Verification Record. The FSIS auditors' direct observations and review of these records did not identify any concerns.

The FSIS auditors verified that GACC requires that government inspection personnel be present at least once during each production shift when processing poultry or Siluriformes fish products intended for export to the United States. In order to provide sufficient staffing, GACC requires that certified establishments submit their production schedules several days prior to the start of their production for export. This requirement allows the GACC to provide sufficient inspection coverage, including a relief inspector, if needed, for each production shift. The FSIS auditors

verified that this requirement has been implemented as intended in both poultry processing and Siluriformes fish establishments.

The FSIS auditors verified that GACC requires that the local CA government inspection personnel conduct at a minimum an annual periodic supervisory visit of certified establishments. GACC's annual supervisory visits include evaluation of certified establishments' HACCP, GMP, and sanitation compliance, as well as evaluation of government inspection personnel knowledge, skills, and abilities for proper implementation of inspection requirements in regard to production and export of poultry or Siluriformes fish products to the United States. The FSIS auditors' review of documented annual supervisory visits conducted in 2021 and 2022 did not identify any food safety concerns and confirmed that these visits and any related follow-up visits were conducted in accordance with GACC's requirements.

FSIS onsite audit verification activities indicate that GACC continues to maintain the legal authority, a regulatory framework, and adequate verification procedures to ensure sufficient official regulatory control using statutory authority consistent with criteria established for this component.

## **VI. COMPONENT THREE: GOVERNMENT SANITATION**

The third equivalence component the FSIS auditors reviewed was Government Sanitation. The FSIS auditors verified that the CCA requires each official establishment to develop, implement, and maintain written sanitation standard operating procedures (Sanitation SOP) to prevent direct product contamination or insanitary conditions, and to maintain requirements for sanitation performance standards (SPS) and sanitary dressing.

The FSIS auditors verified that GACC has requirements for certified poultry and Siluriformes fish establishments to develop, implement, and maintain written sanitation programs to prevent direct product contamination or the creation of insanitary conditions consistent with FSIS requirements in 9 CFR part 416.

At the aquaculture farm level, GACC's Regulation Requirements for Siluriformes Fish Products for Export to the United States provides regulatory requirements for breeding farms regarding the farm's sanitary conditions, sampling and analysis of feed or feed additives, water, live fish, and necessary actions in response to disease outbreaks. GACC's Requirements for Transportation of Raw Materials for Siluriformes Fish Products for Export to the United States provides regulatory requirements regarding sanitary conditions of transport vehicles and required vehicle equipment including water filters, temperature control systems, and oxygen supply devices. The FSIS auditors verified that the local CA government inspection personnel conduct inspection of aquaculture farms at least annually to verify compliance with GACC and FSIS requirements. This annual inspection includes review of the MARA's monitoring of aquaculture farms, traceability of breeding stock, and aquaculture farm hygienic production records. Government inspection personnel also conduct hands-on inspection verification of the aquaculture farm's sanitary condition; inventory of registered chemical and veterinary drugs consumption; and monitoring of the collection of water, feed, and fish samples for chemical residue analysis. The FSIS auditors' review of related records did not identify any concerns.

GACC's Regulation Requirements for Siluriformes Fish Products for Export to the United States includes specific sanitation requirements. Each certified establishment's sanitary procedures must include the required frequency for pre-operational and operational inspections and results of the sanitation inspection must be documented. Poultry establishments certified to export to the United States are required to meet hygiene requirements described in Order No. 23 (2011) and GB 12694-2016. These include the requirements for the premises outside the certified establishment; pest control; water potability and water waste; garbage handling; facility construction and equipment; toxic and harmful materials control; packing, storage and transportation sanitation; and employee hygiene. The Certification and Accreditation Administration of China's (CNCA) Requirements on Safety and Sanitation Requirements for Manufacturers of Food for Export and Product Catalogue of Manufacturers of Food for Export requires certified establishments to maintain the facility in good condition in order to prevent direct product contamination or creation of insanitary conditions. The document includes requirements for establishments' design and structure, maintenance, water supply, ventilation, pest control, lighting, and employee hygiene.

The FSIS auditors observed the in-plant government inspection personnel conducting pre-operational sanitation verification of slaughter and processing areas. The in-plant government inspection personnel's hands-on verification procedures began after the establishment personnel completed their pre-operational sanitation inspection and determined that the facility was ready for government pre-operational sanitation verification activities. Additionally, the FSIS auditors followed the offline government inspection personnel and observed inspection verification of operational sanitation procedures at all audited establishments. These verification activities included direct observation of operations and review of the establishments' associated records.

FSIS onsite audit verification activities indicate that GACC requires establishments certified to export to the United States to develop, implement, and maintain sanitation programs to ensure that the establishment's construction, facilities, and equipment prevent the contamination or adulteration of Siluriformes fish and poultry products intended for export to the United States. The FSIS auditors identified isolated findings related to the inspection verification of sanitation requirements. These are noted in the individual establishment checklists provided in Appendix A of this report.

## **VII. COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM**

The fourth equivalence component the FSIS auditors reviewed was Government HACCP System. The food safety inspection system is to require that each official establishment develop, implement, and maintain a HACCP system.

The FSIS auditors verified that GACC has specific requirements for certified poultry and Siluriformes fish establishments to develop, implement, and maintain HACCP systems consistent with FSIS requirements in 9 CFR part 417.

The FSIS auditors verified that certified establishments' HACCP programs include written hazard analysis; flow charts; supporting documentation for hazard analysis decisions and critical limits, monitoring, and verification activities for critical control points (CCPs); documentation of

validation and reassessments; and records supporting the implementation of the HACCP system. The FSIS auditors reviewed establishment records for monitoring, verification, corrective actions, and validation, as well as inspection daily verification records for all CCPs. The FSIS auditors verified that audited establishments took appropriate corrective actions in response to any critical limit deviations and in-plant government inspection personnel adequately documented and verified the effectiveness of the establishments' corrective actions.

The FSIS auditors verified that in-plant government inspection personnel conduct daily HACCP verification activities that include direct observation of establishment employees' monitoring procedures, hands-on verification, and review of establishment records. The FSIS auditors confirmed that, on an annual basis, GACC evaluates the design and proper implementation of the HACCP system in each of the certified establishments eligible to export Siluriformes fish and poultry products to the United States.

In accordance with GACC requirements, certified poultry slaughter establishments are required to maintain a CCP to control fecal contamination and ensure that contaminated carcasses do not enter the chiller. The Poultry Handbook outlines the GACC inspection requirements for verification of zero tolerance. The FSIS auditors did not identify any concerns regarding zero tolerance CCP monitoring or verification procedures. Poultry processing establishments certified to export RTE products to the United States are required to control *Lm* in the post-lethality environment, as well as *Clostridium perfringens*, *Clostridium botulinum*, and *Bacillus cereus* during stabilization, within the scope of their HACCP systems. Documents reviewed and direct observations by the FSIS auditors for the poultry processing establishment demonstrated that government inspection personnel routinely verify the establishment has developed a HACCP system that addresses the temperature of products during cooking and stabilization.

FSIS onsite audit verification activities indicate that GACC verifies that operators of official establishments comply with GACC's requirement to develop, implement, and maintain HACCP programs for each product category. The FSIS auditors identified isolated findings related to the inspection verification of HACCP systems. These are noted in the individual establishment checklists provided in Appendix A of this report.

## **VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS**

The fifth equivalence component the FSIS auditors reviewed was Government Chemical Residue Testing Programs. The food safety inspection system is to present a chemical residue testing program, organized and administered by the national government, which includes random sampling of internal organs, fat, or muscle of carcasses for chemical residues identified by the exporting country's Siluriformes fish and poultry products inspection authorities or by FSIS as potential contaminants.

The basis for the PRC's national residue program for poultry and Siluriformes fish is described in the PRC's Technology Specifications of Residues Monitoring of Animal & Animal-origin Foodstuffs for Export (2012). This standard outlines the organizations and responsibilities for the monitoring of chemical residues in animals & animal food products intended for export, the

basic procedure for formulation, publication, and implementation of the plan, analysis and reporting of results, response to noncompliant results, as well as the procedure and requirements of supervisory inspection and control measures. Export of Siluriformes fish and fish products is further supplemented by GACC's Measures for the Administration of Import and Export Food Safety, which instructs government inspection personnel to conduct onsite investigation of the aquaculture farm when the laboratory reports the presence of prohibited veterinary drugs or when results exceed the established maximum residue limit.

The FSIS auditors verified that trained government inspection personnel randomly collect poultry or Siluriformes fish samples, securely label and seal sampling containers, and submit samples to assigned government laboratories in accordance with GACC's instructions. The FSIS auditors reviewed inspection sampling forms generated at the audited poultry slaughter establishment, in addition to eight Siluriformes fish establishments and corresponding audited aquaculture farms. The sampling forms captured information, such as name and address of certified establishment (or aquaculture farm), sample collector's name, weight of sample, condition of sample, sample collection date, mode of transport to the laboratory, traceability, and a list of targeted compounds for testing. These documents also indicated that government inspection personnel routinely ensure that poultry or Siluriformes fish received at the slaughter establishments come from approved farms. The FSIS auditors' review of these forms did not identify any concerns.

The FSIS auditors verified that government inspection personnel receive the results of official chemical residue testing in a timely manner, assess the results, and take appropriate actions in accordance with GACC's requirements. The FSIS auditors confirmed that GACC has implemented a hold and test policy for Siluriformes fish and fish products, set forth with the intent to keep product under government control until test results indicate that there are no violative levels of chemical residues in the product. Concerning poultry, section 6.4 of the Poultry Handbook also requires that product be held pending laboratory testing results when product is intended for export to the United States. However, as indicated in previous sections of the report, raw materials for all processed poultry exported to the United States were derived exclusively from slaughter establishments within the United States at the time of the audit.

There have not been any POE violations related to this component since the previous FSIS audit in 2021. The result of the onsite audit activities indicates that GACC continues to maintain the legal authority to regulate, plan, and execute activities of the inspection system that are aimed at preventing and controlling the presence of residues of veterinary drugs and chemical contaminants in Siluriformes fish and fish products and poultry products intended for export to the United States.

## **IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS**

The last equivalence component the FSIS auditors reviewed was Government Microbiological Testing Programs. The food safety inspection system is to implement certain sampling and testing programs to ensure that Siluriformes fish and fish products and poultry prepared for export to the United States are safe and wholesome.



GACC's Microbiological Monitoring Program for Exported Poultry Products, Edition 1.2 (hereafter Monitoring Program), requires poultry slaughter establishments certified to provide source material for use in production of RTE products intended for export to the United States to develop a sampling and testing program to monitor process control throughout the slaughter and dressing process (e.g., at pre-evisceration and post-chill locations). Establishments are to maintain this program in either a HACCP plan, Sanitation SOP, or other prerequisite program. The establishment sampling requirements for monitoring process control throughout the slaughter and dressing process through indicator organism testing are consistent with FSIS requirements in 9 CFR 381.65.

GACC's Monitoring Program also describes official government verification sampling for *Salmonella* in chicken carcasses consistent with FSIS verification sampling in the United States. Carcass rinse samples are submitted to designated government laboratories for analysis and results are reported directly to GACC at the provincial and local levels by means of an electronic laboratory reporting system. If sampling results exceed the established *Salmonella* performance criteria, GACC implements follow-up sampling to verify that the establishment has implemented effective corrective actions to control *Salmonella*.

The PRC currently has one certified poultry slaughter establishment eligible to provide raw source material for further processing into RTE poultry products. This establishment has not yet produced or provided any raw source material to other certified poultry processing establishments within the PRC.

GACC's Poultry Handbook contains instructions that specifically require certified establishments to recognize *Lm* and *Salmonella* as pathogens of concern in RTE products. GACC requirement stipulates zero tolerance for the presence of *Lm* and *Salmonella* in RTE fully cooked poultry products for export to the United States. The export requirements also mandate that all certified processed poultry establishments implement controls for *Lm* in post-lethality exposed products and in the processing environment. The export requirements further specify the analytical methods and sample sizes to be used by the laboratories conducting microbiological analysis of products for either pathogen.

The FSIS auditors observed a demonstration by in-plant government inspection personnel conducting *Lm* verification sampling on food contact surfaces at the audited establishment certified to export post-lethality exposed (PLE) RTE products to the United States. Government inspection personnel followed GACC's instructions while performing sampling. The auditors also observed establishment personnel conducting food contact surface sampling in the PLE RTE production area. FSIS auditors did not identify any concerns with government inspection or establishment implementation of sampling procedures for the detection of *Lm* on food contact surfaces or in the post-lethality processing environment.

The FSIS auditors verified government inspection personnel conduct sampling of RTE products in accordance with GACC requirements. Government verification samples are sent to a government laboratory and analyzed for the presence of *Lm* and *Salmonella*. Additionally, the FSIS auditors verified that government inspection personnel verify that the establishment is

conducting PLE RTE product sampling for *Lm* and *Salmonella* at the frequencies required by GACC.

GACC requires that RTE products sampled by the establishment or by the government be held pending receipt of acceptable results. If a positive sample is found, either through government verification testing or through establishment testing, GACC initiates additional follow-up testing of food contact and environmental surfaces. Poultry product that tests positive or is in direct contact with a positive food contact surface would not be eligible for export and would be under GACC control either to be destroyed or reprocessed. Subsequently, GACC would require the establishment to initiate intensified cleaning and sanitizing of the environment and food contact surfaces. GACC also requires that government inspection personnel conduct an in-depth verification assessment of the design and implementation of the establishment's HACCP system.

The FSIS auditors confirmed that inspection generated records demonstrated that government inspection personnel routinely verify that the audited poultry processing establishment is implementing its sampling and testing programs to verify that *Lm* and *Salmonella* are being effectively controlled in its processes, and that these programs are being administered effectively. Routine product verification testing conducted by government inspection personnel, or the establishment has not identified any *Lm* or *Salmonella* positive results in the audited poultry processing establishment.

FSIS onsite audit verification activities indicate that GACC maintains overall authority to implement an official microbiological sampling program organized and administered by the national government to verify that Siluriformes fish and fish products and poultry products intended for export to the United States are unadulterated, safe, and wholesome. There have not been any POE violations related to this component since the previous FSIS audit in 2021.

## **X. CONCLUSIONS AND NEXT STEPS**

An exit meeting was held on September 28, 2023, in Beijing, China, with representatives from GACC. FSIS concluded that the PRC's food safety inspection system is organized to provide ultimate control, supervision, and enforcement of regulatory requirements. GACC has required that establishments certified to export Siluriformes fish and fish products and poultry products to the United States implement sanitation requirements and a HACCP system designed to improve the safety of their exported products. In addition, GACC has implemented official microbiological and chemical residue testing programs that are organized and administered by the national government to verify its food safety inspection system. An analysis of each component did not identify any findings representing an immediate threat to public health.

# APPENDICES

## **Appendix A: Individual Foreign Establishment Audit Checklists**

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Jiangsu Haitian Sea-Beach Aquatic Foods Co. Ltd. Jiangsu	2. AUDIT DATE 09/21/23	3. ESTABLISHMENT NO. 3200/02512	4. NAME OF COUNTRY The People's Republic of China
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Establishment Operations:	Siluriformes fish slaughter
Prepared Products:	Raw intact catfish

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**60. Observation of the Establishment**

15-Establishments HACCP plan did not list calibration of process monitoring equipment as a verification activity in the HACCP plan.

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**61. AUDIT STAFF**

OIEA International Audit Staff (IAS)

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**62. DATE OF ESTABLISHMENT AUDIT**

09/21/2023

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United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Anhui Fuhuang Sungem Foodstuff Group Co. Ltd. ChaoHu	2. AUDIT DATE 09/13/23	3. ESTABLISHMENT NO. 3400/02027	4. NAME OF COUNTRY The People's Republic of China
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Establishment Operations:	Siluriformes fish slaughter
Prepared Products:	Raw intact catfish

60. Observation of the Establishment

39-Where the Siluriformes fish enter the establishment the metal outer casing around the conveyor and walls were contaminated with dirt and grease. On one wall in this area the molding covering wires was deteriorated exposing the inner area. In the processing area of the establishment, tape was being used to cover up breaks in the wall joints on walls (non-food contact surfaces).

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

09/13/2023



United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Sun Valley Foods Co. Ltd. Chuzhou	2. AUDIT DATE 09/15/23	3. ESTABLISHMENT NO. 3400/03042	4. NAME OF COUNTRY The People's Republic of China
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Establishment Operations:	Poultry slaughter
Prepared Products:	Raw chicken products

60. Observation of the Establishment

39-Where the chickens enter the evisceration area after scalding open seams were observed. Also, near the floor where the molding meets the wall in a couple areas open seams were observed. The caulking was not adequate to protect the inner wall structure in both areas.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

09/15/2023

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Yongda Meiyuan Food Co. Ltd. Hebi	2. AUDIT DATE 09/19/23	3. ESTABLISHMENT NO. 4100/03078	4. NAME OF COUNTRY The People's Republic of China
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .	X	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Establishment Operations:	Processed Poultry
Prepared Products:	Cooked Chicken Products

60. Observation of the Establishment

14-Establishments hazard analysis does not clearly identify which hazards are likely to occur after identifying potential hazards in the hazard analysis.

22-Establishment did not provide a signature or initials at the time of the monitoring and verification activities for all records of critical limit monitoring.

39-Throughout the ready to eat processing and packing areas molding was observed in poor repair. The inner wall area and/or were exposed allowing . Poor sealing and/or molding was observed on the ceiling allowing strings of molding hanging from the ceiling. In the cleaning room wall panels were missing and holes observed in the wall. The caulking was not adequate to protect the inner wall structure from water in both areas this would contribute to insanitary conditions and could also affect the integrity of the wall.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

09/19/2023

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Deyan Aquatic Products and Food Co. Ltd. Huanghu	2. AUDIT DATE 09/13/2023	3. ESTABLISHMENT NO. 4200/02020	4. NAME OF COUNTRY The People's Republic of China
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Establishment Operations:	Siluriformes Fish Slaughter and Processing
Prepared Products:	Siluriformes Raw Intact Meat

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**60. Observation of the Establishment**

22-The establishment's HACCP verification records for review of records did not include the times of verification activities.

39-Presence of numerous gaps between the ceiling and protruding pipes in the ceiling in the production areas where product was present. No direct product adulteration observed.

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**61. AUDIT STAFF**

OIEA International Audit Staff (IAS)

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**62. DATE OF ESTABLISHMENT AUDIT**

09/13/2023

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United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Hubei Shengli Foodstuff Co. Ltd. Xiantao	2. AUDIT DATE 09/15/2023	3. ESTABLISHMENT NO. 4200/02058	4. NAME OF COUNTRY The People's Republic of China
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	X
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Establishment Operations:	Siluriformes Fish Slaughter and Processing
Prepared Products:	Siluriformes Raw Intact Meat

60. Observation of the Establishment

- 38- Deteriorated seal under an exterior shipping door that did not provide a tight seal when the door was closed. This could create insanitary condition and facilitate the entrance of vermin to the production areas.
- 39- Presence of numerous areas with exposed insulation materials on the overhead structures above products in the production area.
- 39-Presence of rusted areas inside of an ice making machine. The auditor did not observe any direct contamination of ice. However, this condition may lead to product adulteration.
- 39-Presence of several holes and numerous gaps between the ceiling and protruding pipes in the ceiling in the production areas where product was present. No direct product adulteration observed.

61. AUDIT STAFF OIEA International Audit Staff (IAS)	62. DATE OF ESTABLISHMENT AUDIT 09/15/2023
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United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Guolian Yiyang Food Co. Ltd. Yiyang	2. AUDIT DATE 09/19/2023	3. ESTABLISHMENT NO. 4300/02022	4. NAME OF COUNTRY The People's Republic of China
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	X
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Establishment Operations:	Siluriformes Fish Slaughter and Processing
Prepared Products:	Siluriformes Raw Intact Meat

60. Observation of the Establishment

22-The establishment's HACCP verification records for direct observation did not include the times of verification activities.

38-Deteriorated seal under two exterior shipping doors that did not provide a tight seal when the doors were closed. This could create insanitary condition and facilitate the entrance of vermin to the production areas.

39-Presence of rusted areas on the overhead structures above exposed products in the production areas.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

09/19/2023

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Zhenye Aquatic Inc. Guangdong	2. AUDIT DATE 09/25/2023	3. ESTABLISHMENT NO. 4400/02223	4. NAME OF COUNTRY The People's Republic of China
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Establishment Operations:	Siluriformes Fish Slaughter and Processing
Prepared Products:	Siluriformes Raw Intact Meat

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**60. Observation of the Establishment**

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

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**61. AUDIT STAFF**

OIEA International Audit Staff (IAS)

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**62. DATE OF ESTABLISHMENT AUDIT**

09/25/2023

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United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Maoming Heng Seafood Co. Ltd. Maoming	2. AUDIT DATE 09/21/2023	3. ESTABLISHMENT NO. 4400/02367	4. NAME OF COUNTRY The People's Republic of China
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Establishment Operations:	Siluriformes Fish Slaughter and Processing
Prepared Products:	Siluriformes Raw Intact Meat

60. Observation of the Establishment

22-The establishment's written HACCP plan did not include direct observation (procedures or frequencies) as part of its ongoing verification activities.

39-Presence of loose/hanging white color silicon type materials on the ceiling of an ice making machine. Silicone was used to fill the space gaps between metal plates constructing the inside top surfaces of the ice making machine cabinet.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

09/21/2023

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Gain Ocean Food Co. Ltd. Beihai	2. AUDIT DATE 09/25/23	3. ESTABLISHMENT NO. 4500/02050	4. NAME OF COUNTRY The People's Republic of China
	5. AUDIT STAFF OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

Establishment Operations:	Siluriformes fish slaughter
Prepared Products:	Raw intact catfish

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**60. Observation of the Establishment**

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

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**61. AUDIT STAFF**

OIEA International Audit Staff (IAS)

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**62. DATE OF ESTABLISHMENT AUDIT**

09/25/2023

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## **Appendix B: Foreign Country Response to the Draft Final Audit Report**

**Letter from the Import and Export Food Safety Bureau of the General Administration of China Customs on Submitting Corrective Measures for Problems Caused by Chinese Cooked Poultry and Siluriformes Fish Enterprises Exporting to the United States**

The Food Safety and Inspection Service Beijing Office,

We have received the 2023 inspection report on the food safety supervision system of cooked poultry and siluriformes fish imported from China by the Food Safety and Inspection Service, the United States Department of Agriculture, which you sent on January 10, 2024.

China side has studied the existing problems of Chinese enterprises listed in the checklist in Appendix A of the inspection report, and supervised all enterprises to make rectifications and corrections. The rectification status of the relevant enterprises is now submitted [REDACTED]

Best regards,

[REDACTED]

The Import and Export Food Safety Bureau  
The General Administration of China Customs

March, 06, 2024