



United States Department of Agriculture

Food Safety and
Inspection Service

OCT 05 2018

1400 Independence
Avenue, SW.
Washington, D.C.
20250

Dr. Ulrich Herzog
Chief Veterinary Officer, Head of BMG-II/B (Consumer Health)
Bundesministerium für Gesundheit (Federal Ministry of Health)
Radetzkystrasse 2
A-1030 Vienna, Austria

Dear Dr. Herzog,

The FSIS on-site audit conducted from May 14 through May 18, 2018, supports that Austria's inspection system continues to remain equivalent to that of the United States. Enclosed is a copy of the final audit report. The comments received from the Government of Austria are included as an attachment to the report.

For any questions regarding the FSIS audit report, please contact the Office of International Coordination, by electronic mail at InternationalCoordination@fsis.usda.gov.

Sincerely,

A handwritten signature in blue ink that reads "for Janell J. Kause". The signature is written in a cursive style.

Janell Kause
Acting International Coordination Executive
Office of International Coordination

Enclosure

FINAL REPORT OF AN AUDIT CONDUCTED IN AUSTRIA

MAY 14-18, 2018

EVALUATING THE FOOD SAFETY SYSTEMS GOVERNING

PROCESSED PORK

EXPORTED TO THE UNITED STATES OF AMERICA

October 3, 2018

Food Safety and Inspection Service
United States Department of Agriculture

Executive Summary

This report describes the outcome of an onsite equivalence verification audit conducted by the United States Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) from May 14-18, 2018. The purpose of the audit was to determine whether Austria's food safety system governing processed pork products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. Austria is eligible to export and currently exports ready-to-eat (RTE) pork products under the following process categories to the United States: not heat-treated - shelf stable (acidified or fermented, dried); heat-treated – shelf stable (acidified or fermented); and fully cooked – not shelf stable.

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, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Points (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

An analysis of the findings within each component did not identify any deficiencies that represented an immediate threat to public health. The FSIS auditor identified the following finding:

Government Sanitation

- Three pieces of equipment (shovel, utensil, combo bin) that are food contact surfaces had fraying and/or cracked plastic. The plastic could potentially tear off and contaminate the product. The government inspectors were not adequately verifying that food contact surfaces of equipment are designed and maintained to prevent the potential for contamination of products. During the 2016 audit, similar findings were identified on other pieces of equipment that are food contact surfaces.

During the audit exit meeting, the Central Competent Authority (CCA) committed to address the preliminary findings as presented. FSIS will evaluate the adequacy of the CCA's documentation of proposed corrective actions and base future equivalence verification activities on the information provided.

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY.....	1
III.	BACKGROUND.....	3
IV.	COMPONENT ONE: GOVERNMENT OVERSIGHT (E.G., ORGANIZATION AND ADMINISTRATION).....	3
V.	COMPONENT TWO: GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (E.G., INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING).....	8
VI.	COMPONENT THREE: GOVERNMENT SANITATION.....	10
VII.	COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINTS (HACCP) SYSTEM.....	12
VIII.	COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS.....	13
IX.	COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS.....	14
X.	CONCLUSIONS AND NEXT STEPS.....	16
	APPENDICES.....	17
	Appendix A: Individual Foreign Establishment Audit Checklists	
	Appendix B: Foreign Country Response to the Draft Final Audit Report (Once available)	

I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) conducted an onsite audit of Austria's food safety system from May 14-18, 2018. The audit began with an entrance meeting held on May 14, 2018, in Vienna, Austria, during which the FSIS auditor discussed the audit objective, scope, and methodology with representatives from the Central Competent Authority (CCA) – Federal Ministry of Labour, Social Affairs, Health, and Consumer Protection (BMASGK).

II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit objective was to determine whether the food safety system governing meat products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. Austria is eligible to export and currently exports ready-to-eat (RTE) pork products under the following process categories to the United States: not heat-treated - shelf stable (acidified or fermented, dried); heat-treated – shelf stable (acidified or fermented); and fully cooked – not shelf stable.

The USDA's Animal and Plant Health Inspection Service (APHIS) recognizes that pork imported from Austria is subject to the classical swine fever requirements specified in Title 9 of the United States Code of Federal Regulations (9 CFR) § 94.31, the swine vesicular disease requirements specified in 9 CFR § 94.13, and the foot-and-mouth disease and rinderpest requirements specified in 9 CFR § 94.11.

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 three-year period, in addition to information obtained directly from the CCA through the self-reporting tool (SRT).

The FSIS auditor was accompanied throughout the entire audit by representatives from the CCA's headquarters, the provincial office, and local inspection offices. 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, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Points (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

The FSIS auditor reviewed administrative functions at the CCA headquarters, one regional office, and two local inspection offices. The FSIS auditor evaluated the implementation of control systems in place that ensure the national system of inspection, verification, and enforcement is being implemented as intended.

The FSIS auditor visited the two processed pork establishments that are certified by Austria to export to the United States. During the establishment visits, the FSIS auditor paid particular attention to the extent to which industry and government interacted to control hazards and prevent noncompliance that threaten food safety. The FSIS auditor examined the CCA's ability to provide oversight through supervisory reviews conducted in accordance with FSIS equivalence requirements for foreign inspection systems outlined in 9 CFR § 327.2.

The CCA employs a German government laboratory, the Lower Saxony State Office Microbiology Laboratory (LAVES). The CCAs ability to provide oversight of this laboratory was reviewed during the audit.

Competent Authority Visits		#	Locations
Competent Authority	Central	1	• BMASGK, Vienna
	Regional	1	• Upper Austrian Provincial Veterinary Services, Linz
Pork processing establishments		2	<ul style="list-style-type: none"> • Establishment AT 40776 EG, Hochreiter Fleischwaren GmbH, Bad Leonfelden • Establishment AT 41586 EG, Hochreiter Fleischwaren GmbH, Reichenthal

FSIS performed the audit to verify the system met 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.] 601 *et seq.*); and
- The Meat Inspection Regulations (9 CFR § 327).

The audit standards applied during the review of Austria's inspection system for processed pork 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 Sanitary/Phytosanitary Agreement; and includes the following:

- Regulation European Commission (EC) No. 178/2002;
- Regulation (EC) No. 852/2004;
- Regulation (EC) No. 853/2004;
- Regulation (EC) No. 854/2004;
- Regulation (EC) No. 882/2004;
- Regulation (EC) No. 2073/2005;
- Regulation (EC) No. 1069/2009;
- Regulation (EC) No. 1099/2009;
- Regulation (EC) No. 142/2011;
- EC Directive No. 93/119/EC;
- EC Directive No. 96/22/EC; and
- EC Directive No. 96/23/EC.

III. BACKGROUND

Austria currently exports not heat treated-shelf stable RTE and fully cooked-not shelf stable RTE pork products to the United States. From May 1, 2015 to April 30, 2018, FSIS import inspectors performed 100 percent reinspection for labeling and certification on 161,867 pounds of processed pork exported by Austria to the United States. Of that amount, additional types of inspection were performed on 68,342 pounds of product, including testing for chemical residues and microbiological pathogens (*Listeria monocytogenes* and *Salmonella*) for which no products were rejected for issues related to public health

Austria is eligible to export processed pork to the United States, provided that the raw pork is sourced from other countries that have an equivalent pork slaughter inspection system and are eligible to export raw pork to the United States. Austria currently imports pork for this purpose from Denmark and the Netherlands.

There are only two establishments in Austria eligible to export products to the United States. Establishment AT 41586 EG does not produce any RTE products, it receives raw product that is processed and shipped to establishment AT 40776 EG for cooking. A majority of the products produced are shipped to Germany and utilized as an ingredient in a further process for eventual export to the United States.

Prior to the onsite equivalence verification audit, FSIS reviewed and analyzed Austria's SRT responses and supporting documentation. During the audit, the FSIS auditor conducted interviews, reviewed records, and observed operations to determine whether Austria's food safety inspection system governing meat is being implemented as documented in the country's SRT responses and supporting documentation.

The FSIS final audit reports for Austria's food safety system are available on the FSIS Web site at: <http://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/importing-products/eligible-countries-products-foreign-establishments/foreign-audit-reports>.

IV. COMPONENT ONE: GOVERNMENT OVERSIGHT (E.G., ORGANIZATION AND ADMINISTRATION)

The first of six equivalence components that the FSIS auditor 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.

The CCA's authority to enforce European Union (EU) food safety inspection laws is outlined in the *Austria Food Safety and Consumer Protection Act (LMSVG)*. The legislation delineates responsibilities for each of the inspection levels, as well as enforcement of the *LMSVG*. The CCA has the legal authority and responsibility to develop and oversee the implementation of

inspection-related procedures in accordance with national standards, in addition to those standards imposed by importing countries.

The FSIS auditor verified that the inspection system is organized and administered by the national government of Austria. Since the 2016 audit, the CCA has changed its name from the Federal Ministry of Health and Women's Affairs to the Federal Ministry of Labor, Social Affairs, Health, and Consumer Protection (BMASGK). At the national level, BMASGK is Austria's CCA. The BMASGK is divided into 10 divisions, with the meat inspection system falling under Division IX Legal Affairs and Consumer Health. Division IX is divided into two Sectors (A and B), with the meat inspection system falling under Sector B Consumer Health and Veterinary Affairs.

Within BMASGK, the Consumer Health and Veterinary Affairs Sector (Sector IX/B) is responsible for food and veterinary matters in addition to exports to the United States and is led by the Chief Veterinary Officer (CVO). Sector IX/B is composed of seven Departments (10 – 16), including the Hygiene in Meat Production Department, Animal By-Products and Export Certification (Department B/12). Within Department B/12, the Office of Veterinarian Export Certification unit has been added since the 2016 audit. Sector IX/B is responsible for issuing all food law, national regulations, veterinary legislation, decrees, and guidelines concerning meat export to third party countries; certifying or decertifying establishments for export; and is responsible for the translation, distribution, and implementation of the United States requirements in establishments certified as eligible to export to the United States.

The Austrian government functions via a system of indirect federal administration whereby the provincial authorities are not under the direct power of the Federal Ministry, but they must execute federal laws. The CCA has one central office and nine provincial offices. The Linz Provincial Office oversees the official inspection activities at two establishments certified as eligible to export processed pork products to the United States. In addition to the CVO, the CCA employs Firstline Veterinarians at the provincial office level who report directly to the CVO.

The Firstline Veterinarians are responsible for verifying that the in-plant inspection personnel and Frontline Veterinarians carry out their daily activities. At the local government level in the establishments, three Frontline Veterinarians have the responsibility to implement and enforce inspection requirements at the establishments eligible to export meat product to the United States. These Frontline Veterinarians assigned to the establishment are the in-plant inspection personnel responsible for carrying out all daily inspection activities. The FSIS auditor verified that the provincial and in-plant inspection team is part of the CCA and is under the oversight of the CCA.

Austria has a definition for the adulteration of products that may not be placed on the market. The *Federal Act of October 7, 1982 on the Inspection of Slaughter Animals and Meat (Meat Inspection Act, FLG No. 522/1982 as amended by FLG No. 1/66/1998)* requires that meat and meat products be fit for human consumption and properly marked and labeled. *LMSVG, Article 5, paragraph 5* further defines adulteration to include food with misleading information from labeling or advertising.

The FSIS auditor's review of the oversight activities carried out at the CCA headquarters, the regional office, and the establishments' government offices demonstrate that the CCA has a single set of rules, has the legal authority and responsibility to enforce inspection regulations, and enforces requirements that ensure adulterated or misbranded products are not exported to the United States. The *BMASGK Manual on Inspecting SPS, SSOP, and HACCP based on FSIS Directive 5000.1, Rev. 2* (Inspection Manual) outlines procedures implemented by Firstline and Frontline Veterinarians that verify the CCA's requirements are met at the two establishments certified to export to the United States. In addition to these procedures, the CCA conducts internal reviews and audits that verify compliance with the CCA's requirements of establishments certified by Austria to export to the United States. The FSIS auditor did not identify any issues with the CCA's ability to ensure a single set of rules are applied for the government inspection system.

The CCA has the responsibility to take enforcement actions in accordance with the *LMSVG*. The FSIS auditor reviewed enforcement procedures at the CCA headquarters. This included a review of the flow of information from laboratories and establishments that could trigger enforcement. Review of the procedures did not raise any concerns with the CCA's ability to identify potential issues that may rise to the level of enforcement. No enforcement actions were taken by the CCA since the previous audit that included production of products intended for export to the United States. The FSIS auditor also reviewed how the CCA verifies the corrective actions outlined by establishments in response to issues of noncompliance. The in-plant inspection personnel are responsible for verification of corrective actions as outlined in the Inspection Manual. Firstline Veterinarians are responsible for verifying that the in-plant inspection personnel have verified corrective actions and the effectiveness and implementation of the establishment's action plan. The FSIS auditor's review of the corrective action verification process did not raise any concerns.

The FSIS auditor verified that all government inspection personnel assigned to the establishments certified by Austria to export to the United States are hired by the provincial government, but authorized and appointed by the CCA for inspection duties. They are part-time government employees paid by the provincial government. The FSIS auditor verified compliance through document review at the CCA headquarters and compliance with *Article 64* of *LMSVG*, which provides the regulatory framework for payment of inspection activities, including in-plant inspection personnel at establishments eligible to export meat product to the United States.

The Frontline Veterinarians assigned to the establishment are the in-plant inspection personnel responsible for carrying out all daily inspection activities. These Frontline Veterinarians are assigned using a monthly duty roster. Under this roster, two of the Frontline Veterinarians are assigned to one establishment each and the third is rotated into the schedule or serves as relief when the assigned Frontline Veterinarian is not able to cover the assignment. These duty rosters were reviewed at both the Linz Provincial Office and the establishments. In addition, Frontline Veterinarians control task records that document inspection activity, which are used to collect reimbursement from establishments for inspection services, were also reviewed. These records indicate that a Frontline Veterinarian was at each audited establishment each day for each shift of the week during processing when inspection was required. The FSIS auditor's review of

establishment staffing with inspectors daily when products are produced for export to United States did not raise any concerns.

Veterinarians are required to have six years of university level education in veterinary medicine. All veterinarians are required to engage in continuing education including courses scheduled by the state government and submit proof of continued education annually. Additionally, the CCA requires the veterinarians assigned to establishments certified by Austria to export to the United States to complete courses specific to requirements for export. The FSIS auditor reviewed the training requirements at the CCA headquarters and in-plant inspection office without identifying any issues.

The FSIS auditor noted that CCA's authority to recall product is provided in the EU food safety laws concerning recall and withdrawal, and these laws apply to exports to third countries. *Article 19 of Regulation (EC) No. 178/2002* lays down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety to include recall and withdrawal. Additionally, *Article 39 of LMSVG* includes Austria's authority to recall unsafe food products. Due to *Regulation (EC) No. 178/2002, Art. 50 (4)*, EU member states must inform the EU-Commission (which is an institution of the European Union, responsible for proposing legislation, implementing decisions, upholding the EU treaties and managing the day-to-day business of the EU) of adulterated products shipped into commerce. In accordance with this regulation, third countries, including the United States, will be informed by the EU-Commission.

The FSIS auditor noted that traceability requirements for food business operators, including establishments certified by Austria to export to the United States, are laid out by *Article 18 of Regulation (EC) No. 178/2002*. The FSIS auditor confirmed that the inspection personnel review and verify the implementation of recall and traceability requirements at the establishments in accordance with the CCA's requirements without any concerns. The FSIS auditor identified no issues with the traceability or recall requirements.

Austria does not have any slaughter establishments certified to export raw products to the United States. The Austrian slaughter establishments are not eligible to supply raw meat to the establishments certified by Austria to export to the United States. All pork is purchased only from EU-approved establishments certified to export to the United States. Currently, all pork is received from eligible establishments in Denmark or the Netherlands. The FSIS auditor verified in documents that the raw materials received were from EU establishments approved to export to the United States. Furthermore, the FSIS auditor examined the Frontline Veterinarian reviews of the paperwork associated with each load of raw materials received to be processed into products certified by Austria for export to the United States.

The CCA has written national legislation, *LMSVG §51 and §52*, and *National Decrees No. 9 Export Control - Approval Procedure for Export and Related Controls (Annex on United States specific issues)* and *No. 10 Export Certification*, which describes the procedures that establishment operators should follow to obtain and maintain approval from the CCA to be certified by Austria to export to the United States. In addition, it describes actions taken by the CCA to verify establishments for approval. The CCA has the sole authority to grant final

certification of a new establishment or to permit an existing certified establishment to maintain its eligibility to export to the United States or decertify the establishment.

The FSIS auditor verified whether elements of the certification and decertification of establishments by the CCA headquarters were adequate, including certification/decertification documents and annual audits of the establishments that included relevant sections corresponding to the sanitation requirements, facility maintenance, Sanitation Standard Operating Procedures (SSOP) and HACCP programs, and microbial testing. The FSIS auditor verified that the CCA officials have conducted the approval process in accordance with Austria's prescribed procedures. The certification /decertification documents and yearly audit of the establishments demonstrated that the CCA audited the facilities and evaluated their ability to meet regulatory requirements before granting certification to export meat to the United States.

The FSIS auditor verified that the CCA has implemented and routinely conducted ongoing training programs intended to ensure that in-plant inspection personnel are aware of specific food safety and inspection requirements that pertain to production of product for export to the United States. Frontline Veterinarians complete specific training, provided by the CCA and provincial offices, in food safety controls and meat inspection techniques. All training is presented to inspection personnel as a maintenance program, including training related to program updates on inspection-related issues and procedures. In addition, inspection personnel are sent to FSIS training seminars as the seminars become available. Trainings are scheduled as applicable for changes to FSIS requirements. All new issuances from FSIS are reviewed by the CCA for applicability to the processing operations occurring in Austria. The FSIS auditor verified the training records of in-plant inspection personnel and observed in-plant inspection personnel while they were conducting their inspection activities and identified no issues of concern.

The FSIS auditor verified that the CCA provides scientific and technical assistance in the field of food safety to inspection personnel and establishments. The CCA disseminates inspection information related to the regulatory and administrative affairs via e-mail to the Linz Provincial Office and to inspection personnel, as well as establishments certified by Austria to export product to the United States. The FSIS auditor verified that technical support is provided to government veterinarians and establishments through e-mails and the use of intranet Web sites.

The CCA employs a German government laboratory, the Lower Saxony State Office Microbiology Laboratory (LAVES). LAVES is an International Organization for Standardization (ISO) 17025, *General requirements for the competence of testing and calibration laboratories*, accredited laboratory that conducts microbiological analytical testing on RTE products destined for export to the United States. The CCA relies on the German government to conduct audits of the laboratory quality system. The CCA oversight includes the review of LAVES laboratory audit reports provided by the German CCA, which includes administrative and technical aspects of the analytical methodology, laboratory personnel qualifications, training, and maintenance of the laboratory equipment. In addition, the CCA reviews the accreditation and third party audit reports (EU and United States) of the microbiological laboratory.

The FSIS auditor examined the third party reviews and audit reports of LAVES generated for the previous year at CCA headquarters. No concerns arose as the result of these reviews. FSIS included this laboratory during its 2017 onsite audit of Germany's meat inspection system and did not identify any issues with the facility that would preclude its use for the Austrian government's verification testing programs.

The audit determined that Austria's government organizes and administers the country's food safety system. In addition, the CCA inspection officials enforce laws and regulations governing production and export of processed pork products at the establishments certified by Austria 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, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING)

The second of six equivalence components that the FSIS auditor reviewed was Government Statutory Authority and Food Safety and Other Consumer Protection Regulations. The system is to provide for 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 auditor verified that the CCA maintains regulatory authority as outlined in official legislation, regulations, decrees, and guidelines issued in accordance with the *LMSVG*. The document outlines Austria's sanitation policies and sanitary measures to protect public health and animal products, and HACCP requirements. Since the 2016 audit, there have been no other regulatory changes associated with the export of meat products to the United States that would have required changes by the CCA.

The FSIS auditor performed onsite observations and reviewed records maintained by inspection personnel at the CCA headquarters, the Linz Provincial Office, and in-plant inspection offices. The FSIS auditor verified that the CCA provides appropriate oversight and direction to inspection personnel for them to use their regulatory authority to enforce requirements of Austria's food safety system governing meat products exported to the United States. The FSIS auditor, accompanied by the CCA representatives, observed the performance of verification activities by the in-plant inspection personnel. The verification activities observed included inspection control tasks associated with the verification of pre-operational and operational sanitation verification procedures, HACCP verification activities, and analysis of establishment *Listeria monocytogenes* (*Lm*) program and CCA verification sample results.

The FSIS auditor verified through direct observation, onsite record reviews, and interviews that in-plant inspection personnel's inspection activities complied with the Inspection Manual. Inspection personnel verified the monitoring of the incoming product critical control points (CCPs) and the traceability control task of incoming meat identification of each load/truck with the receiving documents.

The FSIS auditor also observed the in-plant inspectors in both audited establishments as they conducted the at least once per shift inspection verification activities. These in-plant daily verification activities include direct observation and record review procedures related to Sanitation SOPs, SPS, HACCP critical control point verification, and *Lm* sampling, in accordance with the CCA inspection verification outlined in the Inspection Manual. The FSIS auditor did not observe any noncompliance related to CCP deviations on the day of the audit.

The FSIS auditor verified that the CCA has developed written standards that instruct inspection personnel on how to document noncompliance reports in *NR-Report and Manual* and on how inspection verification activities are to be performed as described within the Inspection Manual. The FSIS auditor also verified that Firstline Veterinarians were aware of this standard, and that they had verified that in-plant inspection personnel were adequately documenting noncompliance reports in the quarterly supervisory reviews.

Additionally, the FSIS auditor assessed the performance evaluation of in-plant inspection personnel and the completion of supervisory reviews of establishments certified eligible to export to the United States. The FSIS auditor determined that regulatory verification and inspection activities were consistently implemented at all audited establishments, using the Inspection Manual, as written. Inspection officials use the authority conferred upon them by the laws of Austria to enforce the rules of their meat inspection system, to identify and document noncompliances, and to verify the adequacy of corrective actions and preventive measures.

The FSIS auditor also reviewed and verified the application of the CCA's supervisory reviews at certified establishments. The reviews of records demonstrated that government officials evaluate the adequacy of the establishments' food safety system and the capability of inspection as a whole in conducting inspection activities at certified establishments. These reviews are conducted by the Firstline Veterinarians from the Linz Provincial Office in accordance with the *LMSVG*.

The FSIS auditor verified that the Firstline Veterinarians had documented outcomes of supervisory reviews, which are conducted annually and quarterly, for establishments that are eligible to export to the United States. The Firstline Veterinarian supervisory reviews are conducted using a standardized format as directed in the *Protocol for Inspection*, which consists of differing emphases for each review and related report, assuring that all areas are included in the supervisory reviews during the year, as required by the *LMSVG*.

The supervisory review report is distributed to the management of the audited establishment, the Frontline Veterinarian assigned to the establishment, the Linz Provincial Office, and the CCA office in Vienna. The in-plant inspection personnel are responsible for verification of corrective actions resulting from the supervisory reviews. The provincial office is responsible for analyzing the results of the review and for conducting follow-up verification of the corrective actions proposed by the establishment. The Firstline Veterinarian is also responsible for confirming that the in-plant inspection personnel had verified those corrective actions and the effectiveness and implementation of the establishment's action plan. The provincial office submits a copy of the quarterly supervisory reviews to the CCA headquarters for further review and analysis. The

FSIS auditor examined the supervisory reviews and inspection-related records and concluded that they were consistent with observations at the establishments.

During the 2016 audit, the CCA did not provide adequate procedures for the implementation of official regulatory control actions associated with sanitation, HACCP systems, and food safety noncompliances. The FSIS auditor verified that the *LMSVG* outlines the procedures for the process of regulatory control. In addition, the CCA provides written procedures for the inspection team for regulatory control actions.

In-plant inspection personnel verify that operators comply with the requirement for separation of product destined for the United States. Each audited establishment maintains a procedure that contains a designated holding area for product that is to be used in the production of product exported to the United States. Products intended for export to the United States are produced separately by shifts or production runs. This allows for the separation of products certified by Austria for export to the United States from others. The FSIS auditor did not identify any issues of product separation or storage during the audit.

The FSIS auditor verified, through review of receiving records, that the raw pork received at the establishments originated from establishments in the Netherlands and Denmark certified to export to the United States. Each load of raw pork product must have the export certificates from the country of origin. The paperwork that accompanies each load must also have documents supporting that slaughtered animals originated from areas that are not subject to APHIS restrictions.

The FSIS auditor verified that the CCA has procedures in place for condemned materials to ensure proper disposal without contamination of other products. These procedures instruct the government veterinarians and establishments on the segregation, storage, and disposal of inedible materials. Containers used for collecting inedible products must be marked and distinguished from other containers using a color-coded system. The FSIS auditor reviewed both inspection verification records and establishment records, and observed the disposal process of condemned and inedible materials at the audited establishments and found no concerns.

Austria's food safety system continues to maintain the legal authority and a documented regulatory framework that is consistent with the requirements for this component.

VI. COMPONENT THREE: GOVERNMENT SANITATION

The third of six equivalence components that the FSIS auditor reviewed was Government Sanitation. The FSIS auditor 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.

The CCA demonstrated that it enforces overarching EU sanitary requirements, including *Regulation (EC) No. 852/2004 Article 4 no 2 cf.*; *Regulation (EC) No. 852/2004 Article 4 no 3 cf.* and *Annex II*; *Regulation (EC) No. 853/2004 Article 3 cf. Annex II Chapter I-VII*, and *Annex III*; and *Regulation (EC) No. 854/2004 Article 4(2)*. In addition, Austria incorporated

regulations consistent with 9 CFR § 416 into its requirements for products exported to the United States. The Inspection Manual provides instructions in order to meet FSIS sanitation requirements.

The FSIS auditor verified that the in-plant inspection personnel at both audited establishments exercise their official authority as prescribed by the regulations of the system and follow guidance provided by the CCA to conduct verification of sanitary conditions. These actions are in accordance with the Inspection Manual.

The in-plant inspection personnel at certified establishments conduct verification of sanitary conditions in accordance with the Inspection Manual, including the evaluation of written sanitation programs; verification of both pre-operational and operational sanitation implementation and monitoring of sanitation procedures including, hands-on verification inspection; and records reviews. The FSIS auditor observed that inspection personnel perform verification of Sanitation SOPs and SPS procedures daily, with pre-operational verification at least monthly at all visited establishments.

While conducting direct observations and verifying the government inspection activities ensure that food contact surfaces are constructed and maintained in a manner that does not risk product adulteration, the FSIS auditor observed the following:

- Three pieces of equipment (shovel, utensil, combo bin) that are food contact surfaces had fraying and/or cracked plastic. The plastic could potentially tear off and contaminate the product. The government inspectors were not adequately verifying that food contact surfaces of equipment are designed and maintained to prevent the potential for contamination of products. During the 2016 audit, similar findings were identified on other pieces of equipment that are food contact surfaces.

The establishment immediately removed the items from production. No product was observed to be contaminated. The establishment's immediate corrective actions were to take these items out of production and conduct immediate monitoring of all food contact surfaces. The government inspector instructed the establishment to take corrective actions to prevent recurrence.

The FSIS auditor assessed the adequacy of pre-operational inspection by directly observing the in-plant inspection personnel conducting pre-operational verification of the establishment's sanitation program at both of the audited establishments. The in-plant inspection personnel conducted this activity in accordance with the established procedures at least once a month, including a pre-operational record review of the establishment's monitoring results and an organoleptic inspection of food contact surfaces of facilities, equipment, and utensils; as well as an assessment of SPS requirements (e.g., ventilation, condensation, and structural integrity). Inspection personnel have the option to increase the frequency of these inspection activities based on the regulatory compliance of the establishment.

In addition, the FSIS auditor observed the in-plant inspection personnel's verification of operational sanitation procedures in both audited establishments, comparing the overall sanitary conditions of all audited establishments to the CCA's inspection verification documentation.

The FSIS auditor's verification activities included direct observation of operations and review of the establishments' sanitation monitoring and corrective action records at all establishments. The FSIS auditor also examined the CCA's documentation of inspection verification results documented on the *Pre-Op and Op Checklist, Documentation of the Daily Control* report, including the noncompliance report and CCA supervisory reviews (audits) of each establishment.

During the 2016 audit, FSIS observed deficiencies with the CCA's ability to identify and enforce SPS requirements related to product handling and equipment maintenance. In response, the establishment took immediate action and proposed preventive measures that included changes in procedures for receiving and handling of raw materials. The FSIS auditor confirmed the implementation of corrective actions by verifying that these issues are not recurring.

The FSIS auditor identified weaknesses with the CCA's ability to consistently verify that all food contact surfaces are designed and maintained in such a manner sufficient as to prevent risk of product contamination. The CCA provided FSIS with immediate corrective actions taken by the establishment and the actions the CCA took to verify that the implementation of those corrective actions meet sanitation standards.

VII. COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINTS (HACCP) SYSTEM

The fourth of six equivalence components that the FSIS auditor 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 verification and evaluation of this component included the documents that the CCA issued as instructions for the implementation of HACCP programs in establishments eligible to export to the United States. These documents included the *LMSVG* and the Inspection Manual. These documents require that establishments exporting to the United States develop, implement, and maintain HACCP programs. The *LMSVG* contains requirements that establishments eligible to export to third countries are required to fulfill the requirements of these countries. This legislation also requires that the establishments meet the requirements of *Appendix A - FSIS Compliance Guidelines for Meeting Lethality Performance Standards for Certain Meat and Poultry Products* and *Appendix B - FSIS Compliance Guidelines for Cooling Heat-Treated Meat and Poultry Products (Stabilization)* to ensure that products are meeting United States standards.

The CCA reviews the design and implementation of all certified establishments' HACCP programs yearly, prior to granting export certification renewal. The CCA verification includes the review of all aspects of the written HACCP programs, based on the *LMSVG* and the Inspection Manual. This verification includes such activities as the evaluation of written HACCP programs consistent with procedures in 9 CFR Part § 417 and observing the establishment personnel perform monitoring, verification, corrective actions, and recordkeeping activities.

The Senior Firstline Veterinarian conducts this verification, which also includes the review of the Upper Austrian Provincial Veterinary Services' quarterly supervisory reviews (audits) of the certified establishments. The quarterly supervisory review includes review of the inspection/verification procedures performed by the establishment on HACCP requirements. In addition, these reviews include verification that the establishment is meeting HACCP requirements.

The FSIS auditor verified through record reviews and direct observations that in-plant inspection personnel conducted daily verification of HACCP plans in accordance with the Inspection Manual. In-plant inspection personnel document verification results in the *Documentation of the Daily Control* report. The in-plant inspection personnel verification of HACCP plans includes daily verification of establishment generated HACCP monitoring, verification and corrective action records for CCPs, and direct observation of those procedures by the establishment to assess the adequacy of implementation of HACCP plans on the part of the establishments. There was no indication of any noncompliance trends resulting from the review of these documents.

The FSIS auditor reviewed the in-plant inspection verification records associated with CCP inspection tasks as documented in the *Documentation of the Daily Control* report, with no issues found. FSIS concluded that Austria's food safety system requires all establishments certified to export to the United States to develop and implement HACCP systems. The audit concluded that the CCA has incorporated and implements HACCP verification procedures into the inspection system.

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

The fifth of six equivalence components that the FSIS auditor 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, and muscle of carcasses for chemical residues identified by the exporting country's meat inspection authorities or by FSIS as potential contaminants.

Austria, in accordance with *EC Directive 96-23*, develops and implements a national residue program each year. However, since no slaughterhouses are currently certified as eligible to export to the United States, this residue program does not apply to product eligible for export to the United States.

All pork used in the manufacture of products destined for the United States is imported by Austria from either Denmark or the Netherlands. Both of these countries, also member states of the EU, have residue plans that are acceptable by EU standards and are therefore acceptable to FSIS criteria. No import testing is done in Austria of raw pork product from Denmark or the Netherlands, as trade between member states is not considered an import from a third country (*Regulation (EC) No. 884 /2004* for the development of the trans-European transport network).

The FSIS auditor reviewed records of incoming raw pork products to assure that products intended for use in product destined for the United States came from establishments certified for export to the United States from either Denmark or the Netherlands without any concerns.

IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS

The sixth of six equivalence components that the FSIS auditor reviewed was Government Microbiological Testing Programs. The food safety inspection system is to implement certain sampling and testing programs to ensure that meat products prepared for export to the United States are safe and wholesome.

The evaluation of this component included a review and analysis of requirements concerning RTE product cited in *Regulation (EC) Nos. 178/2002; 852/2004; 882/2004; and 2073/2005* on *Microbiological Criteria for Foodstuffs* in addition to the *LMSVG*. The *LMSVG* contains a requirement that establishments eligible to export to third countries are required to fulfill the requirements of these countries. This legislation provides instruction to the inspection personnel and establishments certified to export to the United States concerning implementation of measures against *Lm* and *Salmonella* in RTE products consistent with 9 CFR § 430 and ensures zero tolerance for *Lm* and *Salmonella* for export to the United States.

All lots of product tested by the CCA for verification of pathogen controls are held pending test results at the establishment or under lock and key (under government control) in the event they are not at the establishment that produced the lot(s) of products. The FSIS auditor verified that a day's production of products intended for export to the United States is considered a lot and this is reflected in the labels. Establishments are also required to hold products either at the establishment or under lock and key for any pathogen testing done for each lot. The FSIS auditor verified that the government inspectors and establishment have the ability to prevent products from entering the United States prior to the reception of acceptable test results.

The FSIS auditor verified that the CCA has a verification-testing program in place per FSIS's equivalence criteria for RTE products. The CCA conducts official verification testing for *Lm* and *Salmonella* in RTE products and for *Lm* on product contact surfaces and non-product contact surfaces (environmental). The CCA's official sampling frequency of finished product for *Lm* and *Salmonella* is at least 12 samples per year, environmental sample testing for *Lm* of at least 18 samples per year (divided into 3 sample cycles, each consisting of at least four food contact surfaces and at least 2 non-food contact surfaces). The FSIS auditor verified that in-plant inspection personnel collect official sampling of finished product and the Firstline Veterinarian collects all environmental samples during supervisory reviews (audit). All samples are shipped to the laboratory in a security-sealed bag that is labeled and numbered.

During the 2016 audit FSIS noted that the CCA had not provided adequate instructions to inspection personnel that would ensure product that has tested positive for *Lm*, or product that has come into contact with food contact surfaces that have tested positive for *Lm*, whether sampled by the CCA or the establishment, is not exported to the United States. During this audit, the FSIS auditor verified that the CCA ensures that products intended for export to the United

States that have been in contact with a food surface that tested positive for *Lm* are declared unfit for export to the United States. A specific operating instruction document to the Austrian inspection personnel including this procedure has been created by the CCA. Products destined for export to the United States are held pending test results. The FSIS auditor verified this through discussion with the CCA headquarters and local inspection officials without any concerns.

The FSIS auditor additionally verified that the only establishment that produces RTE products for export to the United States has a program in place to meet FSIS equivalence criteria for control of *Lm* consistent with 9 CFR § Part 430, as required by the CCA. (Note: Establishment AT 41586 EG does not produce any RTE products, it receives raw product that is processed and shipped to establishment AT 40776 EG for cooking.) A review of the establishment's RTE prerequisite program identified that the establishment samples and tests product, food contact surfaces, and environmental areas of all products with post-lethality exposure destined for export to the United States. Additionally, all RTE products are tested for *Lm* and *Salmonella* and held pending test results for each load. The establishment tests and holds all product lots produced for export to the United States pending a negative test result.

The FSIS auditor reviewed both CCA official verification sampling results and establishment results and found no positive *Lm* or *Salmonella* test results for product produced for export to the United States within the last year. The Austrian government and establishments certified to export to the United States employ LAVES, which uses the FSIS Microbiology Laboratory Guidebook (MLG) methods.

The FSIS auditor reviewed the LAVES accreditation for ISO 17025, *General requirements for the competence of testing and calibration laboratories*, and verified that the current analytical test portions for both *Lm* and *Salmonella* meet the export requirements of a minimum of 25 g (*Lm*) and 325 g (*Salmonella*) analytical test portions using MLG 8.09 for testing *Lm* in RTE products and MLG 4.08 for testing *Salmonella* in RTE products. The CCA provided an outline of the internal audit criteria conducted annually at LAVES. The audit criteria included checks of all elements in the LAVES Quality Management System. The Food Analysis Performance Assessment Scheme, which is accredited to ISO/IEC 17043, does proficiency testing *Conformity assessment -- General requirements for proficiency testing*. The proficiency testing is done annually on the test methods used for samples that are sent to LAVES as part of the CCA's verification activities for pathogen controls by the establishment.

In addition, the FSIS auditor reviewed the CCA's laboratory submission and sample result reports for product destined to the United States for *Salmonella* and *Lm* verification testing, CCA *General Schedule for Sampling letter*, and the *Authorization for Sampling letter*. These documents authorize the sampling and give a yearly sampling schedule for *Lm* and *Salmonella*. The letters are issued by the CCA in Vienna to the Linz Provincial Office in accordance with the *LMSVG* requirements. The review of these documents found no concerns within the CCA's implementation of microbiological testing programs for the verification of RTE products.

All positive laboratory report results are forwarded by the laboratory directly to the Firstline Veterinarian who then sends them to the Frontline Veterinarian, District Veterinarian, and CCA headquarters. The establishment's verification testing results are also reviewed by the in-plant inspection personnel and Firstline Veterinarians.

The analysis and onsite verification activities indicate that Austria's meat inspection system has a microbiological testing program organized and administered by the national government. Analytical testing conducted by FSIS at United States POE has not reported any microbiological violations. In addition, the CCA implements sampling and testing programs to ensure that meat products produced for export to the United States are safe and wholesome. There have not been any POE violations related to this component since the 2016 FSIS audit.

X. CONCLUSIONS AND NEXT STEPS

An exit meeting was held on May 18, 2018, in Vienna, Austria, with the CCA. At this meeting, the FSIS auditor presented the preliminary findings from the audit.

An analysis of the findings within each component did not identify any deficiencies that represented an immediate threat to public health. However, the FSIS auditor identified the following finding:

Government Sanitation

- Three pieces of equipment (shovel, utensil, combo bin) that are food contact surfaces had fraying and/or cracked plastic. The plastic could potentially tear off and contaminate the product. The government inspectors were not adequately verifying that food contact surfaces of equipment are designed and maintained to prevent the potential for contamination of products. During the 2016 audit, similar findings were identified on other pieces of equipment that are food contact surfaces.

During the audit exit meeting, the CCA committed to address the preliminary findings as presented. FSIS will evaluate the adequacy of the CCA's documentation of proposed corrective actions and base future equivalence verification activities on the information provided.

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 Hocheiter Fleischwaren GmbH, Bad Leonfelden	2. AUDIT DATE 05/15/18	3. ESTABLISHMENT NO. AT 40776 EG	4. NAME OF COUNTRY Austria
	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	0
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	0
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	0
25. General Labeling		53. Animal Identification	0
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	0
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	0
27. Written Procedures	0	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	0	56. European Community Directives	
29. Records	0	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	0	59.	
31. Reassessment	0		
32. Written Assurance	0		

60. Observation of the Establishment

45- Three pieces of equipment (shovel, utensil, combo bin) that are food contact surfaces had fraying and/or cracked plastic. The plastic could potentially tear off and end up the product. The government inspection system was not adequately verifying that food contact surfaces of equipment are designed and/or maintained in manner to prevent the potential for contamination of products.

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

May 15, 2018

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Hocheiter Fleischwaren GmbH Reichenthal	2. AUDIT DATE 05/16/18	3. ESTABLISHMENT NO. AT 41586 EG	4. NAME OF COUNTRY Austria
	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	0
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	0
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	0
25. General Labeling		53. Animal Identification	0
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	0
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	0
27. Written Procedures	0	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	0	56. European Community Directives	
29. Records	0	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	0	59.	
31. Reassessment	0		
32. Written Assurance	0		

60. Observation of the Establishment

61. AUDIT STAFF

OIEA International Audit Staff (IAS)

62. DATE OF ESTABLISHMENT AUDIT

May 16, 2018

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

Amt der Oö. Landesregierung (Office of the upper Austrian Government)
Direktion Soziales und Gesundheit (Agency for social and health issues)
Abteilung Ernährungssicherheit und Veterinärwesen (Section for food and veterinary matters)
4021 Linz • Bahnhofplatz 1

Reference:

ESV-2016-236503/30-Hai

Bundesministerium für Arbeit, Soziales,
Gesundheit und Konsumentenschutz
Bereich IX/B - VerbraucherInnenengesundheit
und Veterinärwesen
Radetzkystraße 2
1030 Wien

Federal ministry for employment, social
matters, health and consumer protection
Section IX/B - Consumer health
and veterinary matters

Official: Dr. Thomas Hain
Tel: (+43 732) 77 20-14240
Fax: (+43 732) 77 20-214360
E-Mail: esv.post@ooe.gv.at

Linz, 12.09.2018

Upper Austria's statement on the audit report of the USDA-FSIS for the audit von 140518 - 180518

To whom it may concern!

To the present draft of the audit report of FSIS in May of this year, the comments already made in the final discussion of the audit will be made again, from the point of view of the participating first-line supervisor:

to Section X. Conclusions and next steps – Government Sanitation

The foreign object issue in plastic equipment was very well taken seriously, as documented by the First Line Control Reports March 2017 and May 2017.

Furthermore, the company has a self monitoring setup – see QM Doc. 28.1.

Also, it was stated in three passages of the Senior Firstline Report of November 2017, that the handling of plastic (foreign bodies) is now in order.

Therefore, it is stated that, although there is a control system in place, the main focus is on larger foreign bodies and somewhat too low on smaller plastic parts.

In the meantime, the following measures were ordered by the supervisory bodies in the company:
A training of all employees has taken place on August 8th 2018, to increase the attention regarding the foreign body danger by plastic parts even more;
A concept, regarding conversion to metal blades and possibly other transport containers is being developed.

Sincerely

Dr. Thomas Hain

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Measures
Date: Thursday, September 27, 2018 10:31:43 AM

Dear [REDACTED],

As just discussed on the phone, please find below the measures taken by the Upper Austrian Veterinary Services that address how the government inspection system will verify, on an ongoing basis, the sanitary maintenance and design of food contact surfaces:

- Directly after our closing meeting on May 18, 2018, the Senior Firstline Officer sent an E-Mail to the Frontline Veterinarians to inform them about the preliminary finding.
Oral instructions to focus on worn, frayed, and damaged food contact surfaces of equipment, which must be maintained or designed in a manner to prevent the potential for contamination of products, were already given to the Frontline Veterinarians by the Firstline Officer during the audit and also after the audit.
- The Firstline officers of the Upper Austrian Veterinary Services also focused on this matter during their most recent quarterly audit, but they are still working on the report.

Please do not hesitate to contact me, should you have any further questions.

Thanks,

[REDACTED]

Federal Ministry of Labour, Social Affairs, Health and Consumer Protection
Department IX/B/12 Hygiene in Meat Production, Animal by-Products and Export Certification

