

FINAL REPORT OF AN AUDIT CONDUCTED IN  
THE PEOPLE'S REPUBLIC OF CHINA

March 4-19, 2013

THE FOOD SAFETY SYSTEM GOVERNING  
THE PRODUCTION OF SLAUGHTERED POULTRY  
INTENDED FOR EXPORT TO  
THE UNITED STATES OF AMERICA

Food Safety and Inspection Service  
United States Department of Agriculture

## Executive Summary

This audit report describes the outcome of an on-site initial equivalence audit conducted by the Food Safety and Inspection Service (FSIS) on March 4 -19, 2013. The audit had two main objectives: (1) determine the performance of the People's Republic of China (PRC) food safety system in regards to each of the six equivalence components and (2) verify implementation of corrective actions identified in the December 1-21, 2010 audit which found the People's Republic of China (PRC) food safety system governing poultry slaughter not to be equivalent to that of the United States (U.S). This audit occurred concurrently with an equivalence audit of the PRC's poultry processing inspection system, for which the observed findings are included in a separate report.

The audit focused on the ability of the Central Competent Authority (CCA), the General Administration for Quality and Safety Inspection and Quarantine (AQSIQ), to regulate the slaughtered poultry production. FSIS audited four poultry slaughter establishments, the CCA headquarters, and the CIQ Shandong province government offices. Determinations concerning the effectiveness of the PRC's food safety program focused on performance within the following six equivalence components: (1) Government Oversight, (2) Statutory Authority and Food Safety Regulations, (3) Sanitation, (4) Hazard Analysis and Critical Control Point Systems, (5) Chemical Residue Programs, and (6) Microbiological Testing Programs.

The auditors concluded that the CCA is able to meet the principal requirements for the following equivalence components: (3) Sanitation, (4) Hazard Analysis and Critical Control Point Systems, (5) Chemical Residue Programs and (6) Microbiological Testing Programs. Components where post mortem inspection findings were inconsistent and would require corrective actions, as proffered by PRC in keeping with 9 CFR 381.67 and 381.76 were: (1) Government Oversight, and (2) Statutory Authority and Food Safety Regulations. The auditors found similar post mortem inspection findings in December 2010 audit:

- The CCA lacks a standardized method to assign inspection personnel to slaughter facilities based on objective measurements such as inspection methodologies production line rates, inspection workloads, and line configuration including bird presentation and inspection station sequence.

In response to the December 2010 audit finding, the CCA had proffered to use FSIS 9 CFR 381.67 and 9 CFR 381.76 as a standardized method for production line rates, inspection workloads, and line configuration for the post mortem inspection. During the current audit, the FSIS auditors observed that the CCA had not implemented the proffered corrective actions. In addition, auditors found that there was problem with post mortem inspection activities, inspection station sequence, bird presentation, line speeds, lack of a start/stop button, and inadequate inspection station lighting intensity across the four audited establishments. The required facility structure such as selectors or "kickouts" identified in 9 CFR 381.36 was not observed in any establishment audited, which led to certain problems discussed in the report. Furthermore, one inspector examined viscera, one inspector examined the body surface, and one inspector examined the body cavity per bird, which is not consistent with FSIS 9 CFR 381.67 and 9 CFR 381.76 where only one inspector examines the viscera, body surface and body cavity

per bird. Therefore, FSIS found that not every poultry carcass received adequate inspection. Therefore, PRC will have to make changes to ensure that every carcass receives adequate inspection.

On November 15, 2013, AQSIQ responded that it intends to make changes to its poultry slaughter inspection system to address FSIS's audit findings. FSIS will evaluate AQSIQ's response. If FSIS were to find that the response appears to adequately address its concerns, the Agency will conduct an audit to verify that PRC has made the proffered changes to its system before making a tentative judgment about the Chinese slaughter inspection system for poultry.

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## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

AHVB	Animal Husbandry and Veterinary Bureau
AQSIQ	Administration of Quality and Supervision and Inspection Quarantine
CCA	Central Competent Authority (AQSIQ)
CCP	Critical Control Point
CFR	Code of Federal Regulations
CIQ	Inspection and Quarantine Authority (Branch and Provincial)
CNAS	<i>China National Accreditation Service for Conformity Assessment</i>
CNCA	Certification and Accreditation Administration
CUSUM	Cumulative Sum
<i>E. coli</i>	<i>Escherichia coli</i>
FSB	Entry-Exit Food Safety Bureau
FSL	PRC Food Safety Law
FSIS	Food Safety and Inspection Service
GB	Guobiao
HACCP	Hazard Analysis and Critical Control Point
<i>Lm</i>	<i>Listeria monocytogenes</i>
MOA	Ministry of Agriculture
MOH	Ministry of Health
PPIA	Poultry Products Inspection Act
PRC	People's Republic of China
RTC	Ready-to-cook
<i>Salmonella spp.</i>	<i>Salmonella</i> species

SSOP	Sanitation Standard Operating Procedures
U.S.C.	Unites States Code
USDA	United States Department of Agriculture
VIC	Veterinarian-in-Charge

## **1. INTRODUCTION**

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) conducted an on-site verification audit of the People's Republic of China (PRC) poultry slaughter inspection system from March 4-19, 2013. This audit was conducted simultaneously with a separate audit reaffirming FSIS' prior equivalence determination for the PRC's poultry processing inspection system for which the findings are included in a separate report.

The audit began with an entrance meeting on March 4, 2013, in Beijing with the participation of representatives from the General Administration of Quality Supervision, Inspection and Quarantine's (AQSIQ) Central Competent Authority (CCA); the Certification and Accreditation Administration (CNCA); Inspection and Quarantine (CIQ) from the Shandong province; representatives from USDA's Foreign Agricultural Service (FAS) at the United States Embassy-Beijing; and the FSIS audit team. The FAS provided assistance with translations and travel logistics.

## **2. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY**

FSIS' objective for the audit was to determine whether the PRC's food safety system governing poultry slaughter inspection system is equivalent to that of the United States (U.S.), with the ability to produce and export products that are safe, wholesome, unadulterated, and properly labeled. In pursuit of this objective and prior to the on-site verification audit, FSIS reviewed and analyzed the proffered corrective actions submitted by the CCA to address findings FSIS identified in the 2010 audit as not being equivalent for each of the components of the poultry slaughter inspection system.

Representatives from the CNCA, CIQ-Shandong, and FAS Beijing accompanied the FSIS auditors throughout the audit. Determinations concerning program effectiveness focused on performance within the following six components upon which system equivalence is based: (1) Government Oversight, (2) Statutory Authority and Food Safety Regulations, (3) Sanitation, (4) Hazard Analysis and Critical Control Point Systems, (5) Chemical Residue Programs, and (6) Microbiological Testing Programs.

FSIS auditors evaluated the implementation of management control systems developed by the PRC to ensure that poultry inspection verification and enforcement activities are standardized. The government offices audited included the CCA headquarters in Beijing, and the CIQ Shandong Provincial office along with interviews of representatives from three CIQ local offices in the Shandong province.

To verify the CCA's ability to provide consistent government oversight, FSIS visited four poultry slaughter establishments identified by the CCA as eligible to export poultry products to the United States. During establishment visits, FSIS placed its emphasis on the CCA's ability to provide oversight of inspection personnel through supervisory reviews conducted in accordance

with Title 9 U.S. Code of Federal Regulations (CFR), Part 381.196 and the in-plant inspectors' ability to verify industry compliance with the associated laws and regulations.

This 2013 verification audit did not include visits to the analytical laboratories because the auditors did not report systemic deficiencies with the technical support of the poultry slaughter inspection system in the 2010 audit report. A copy of the 2010 report can be viewed at <http://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/importing-products/eligible-countries-products-foreign-establishments/foreign-audit-reports>

### Audit Scope Summary

Competent Authority Visits		No.	Locations
Competent Authority	Central	1	AQSIQ, Beijing
	Provincial office	1	• Shandong Entry-Exit Inspection and Quarantine Bureau, Qingdao
	Local offices	3	• Qingdao, Weifang, Dezhou
Poultry Slaughter Establishments		4	<ul style="list-style-type: none"> <li>• Qingdao 9- Alliance Group Ltd (Chickens)</li> <li>• Zhucheng Waimao Co, Ltd (Chickens)</li> <li>• Weifang Legang Food Co., Ltd (Ducks)</li> <li>• Zhong' AO Holdings Group Co., Ltd (Ducks)</li> </ul>

### 3. LEGAL BASIS FOR THE AUDIT AND AUDIT STANDARDS

The audit was conducted under the specific provisions of the United States' and the PRC's laws and regulations, specifically:

U.S. Poultry Products Inspection Act, (Title 21 United States Code (U.S.C.) 451, et seq.)

U.S Poultry Products Inspection Regulations regarding eligibility to import to the United States (9 CFR 381.196)

PRC Food Safety Law (FSL), 2009

PRC Administrative Rules on Quarantine of Animal (Decree No. 6), January 21, 2010

While the audit standards included applicable legislation and procedures submitted to FSIS by the PRC, this audit included a review of the proffered corrective actions submitted to FSIS by the PRC in response to the 2010 audit findings. Supplemental supportive documentation provided by the CCA during the 2013 audit and during the draft audit report writing phase were also reviewed and analyzed.

### 4. BACKGROUND

The PRC first requested an initial equivalence determination of its poultry slaughter inspection system in May 2004, for which FSIS conducted on-site audits in 2004 and 2005. During the

2005 audit, FSIS identified significant issues within the system concerning the payment of official inspectors and the use of certain analytical methods for chemical residues. Although the PRC proffered corrective actions, as a result of the enactment of the U.S. Omnibus Appropriations Act (Section 733) in 2007, the equivalence process was not completed, and consequently, FSIS did not verify the corrective actions. During the interim, between the 2005 and 2010 audits, the PRC enacted in 2009, a new Food Safety Law (FSL). This development required FSIS to evaluate the impact that this new legislation had on the CCA's authority to provide oversight to its poultry slaughter inspection system. As a result, in June 2010, FSIS sent a team to the PRC to collect information related to applicable legislation for FSIS to continue the equivalence determination process.

After conducting a comprehensive analysis of the FSL 2009 and all relevant legislation supporting the PRC's poultry slaughter inspection system, FSIS conducted an audit of the PRC's poultry slaughter inspection system in December 1-21, 2010 and reported the findings of the audit to the CCA. All findings that FSIS auditors reported were made public at <http://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/importing-products/eligible-countries-products-foreign-establishments/foreign-audit-reports>

In response to these findings, the CCA submitted corrective actions, which FSIS reviewed and analyzed as a precursor to conducting the 2013 verification audit. This audit was conducted in conjunction with a separate audit reaffirming FSIS' prior equivalence determination for the PRC's poultry processing inspection system.

The USDA's Animal and Plant Health Inspection Service (APHIS) has affirmed PRC to be affected with highly pathogenic Avian Influenza subtype H5N1 and Exotic Newcastle Disease and therefore, prohibits PRC from exporting raw poultry to the U.S. APHIS is currently conducting a risk assessment for these animal diseases, and until APHIS lifts these disease restrictions PRC cannot export raw poultry products to the U.S.

## **5. GOVERNMENT OVERSIGHT**

The first of the six components that the FSIS auditors reviewed was Government Oversight. The evaluation included a review and analysis of corrective actions submitted by the CCA in response to the December 2010 FSIS audit. Based on the analysis of the corrective actions submitted by the PRC in response to the 2010 audit and the results of the current verification activities conducted in the 2013 audit, FSIS concludes that PRC has not implemented the proffered corrective action to use FSIS 9 CFR 381.67 and 9 CFR 381.76 as a standardized method for assigning inspector personnel to slaughter facilities based on production line rates, inspection workloads, and line configuration. In addition, review of documentation and on-site observation, FSIS cannot determine equivalence based on aforementioned factors. Therefore, the PRC does not meet equivalence for this component.

In 2010, the FSIS auditors assessed the extent to which the PRC's poultry slaughter inspection system was organized and administered by the government of the PRC, and they confirmed that the State Council of the PRC delegates to AQSIQ had the authority to administer the poultry slaughter inspection system for exports. AQSIQ serves as the CCA responsible for the safety of

food products, promulgates of regulations on food inspection, and has sole authority to enforce the laws and regulations of the export system. Registration and certification of import/export food enterprises is conducted by two major bureaus of the CCA, namely the Certification and Accreditation Administration (CNCA) and the Entry-Exit Food Safety Bureau (FSB), which verify that establishments fulfill official requirements prior to being granted certification to export. Funding for CCA operations is provided by the central government and is supplemented by fees assessed by the government on exported products.

In addition, the auditors verified that the Ministry of Agriculture (MOA), the China National Accreditation Service for Conformity Assessment (CNAS), and the Ministry of Health (MOH) interact with the CCA to develop and implement appropriate regulations for the production of poultry products for export. As part of this arrangement, the CCA and CNAS have promulgated the national standard that provides the general requirements for laboratory quality systems, and the MOA issues poultry health certificates to guarantee the health status of slaughtered flocks. FSIS auditors observed that the CCA delegates to Chinese inspection and quarantine bureaus (CIQ) located throughout the country the responsibility to implement inspection of animals and animal products, to issue health certificates, and to regulate poultry slaughtering activities at establishments producing products for export. In 2013, FSIS auditors verified that the organizational structure for delegation of authority has not changed.

In 2010, the auditors observed that CIQ officials assigned to enforce the laws and regulations governing poultry inspection in official establishments were veterinarians. However, similar to observations made during the 2005 audit, the FSIS auditors noted that ante-mortem and post mortem inspection duties were conducted by both CIQ contracted veterinarians and establishment-paid inspectors. Establishment-paid inspectors received training from CIQ and exercised the authority to make food safety related official dispositions on inspected poultry. While the PRC was not yet fully operating in U.S.-mode during the audit, the auditors concluded that this arrangement constituted a conflict of interest and did not meet the requirements for the CCA to have ultimate control and supervision over the official activities of all employees or licensees of the system, as articulated in the FSIS import regulations (9 CFR 381.196). As a corrective action, AQSIQ proposed to employ government officials to conduct all official ante and post mortem inspection.

In 2013, the FSIS auditors verified that the CCA has implemented measures to ensure that employees of the Chinese government perform official enforcement of regulatory requirements for ante and post mortem inspection. The verification consisted of cross-referencing the identification badges and names of the CIQ inspectors, who were performing inspection work, with CIQ office employment database, an employee pay stub, training records, and a list of names of those employees that FSIS auditors interviewed. The employment records demonstrated that personnel conducting inspection activities were employees of the Chinese government. FSIS verified that both the CIQ Entry-Exit Inspection and Quarantine Bureau and the CIQ Livestock Bureau hire and retain employee records for staff assigned to work at establishments producing poultry products destined for the U.S. Employees are issued ID cards, with or without photos, and assigned specific numbers that correlate to the respective CIQ Bureau database. Based on the results of the verification conducted, the FSIS auditors concluded that the CCA has adequately addressed the finding reported in 2010 to ensure that only government officials conduct inspection and verification activities at certified establishments.

In 2010, the auditors found that the CCA disseminates information throughout the three sectors (government offices, establishments and laboratories) pertaining to regulatory and administrative affairs, either electronically or via hard copies. The provincial CIQs oversaw the inspection system by designing and implementing inspection procedures per the national standards in addition to those standards imposed by importing countries. CIQ procedures for implementation of national standards were not consistently followed across all provinces audited. FSIS concluded that this autonomy created significant variation in the application of standards amongst provinces. The auditors observed that sample collection procedures associated with testing for *Salmonella* spp. in raw products, on-line presentation of carcasses, and official inspection of viscera, were not performed consistently throughout the audited establishments. The lack of standardized inspection procedures and the lack of government oversight of its inspection personnel were reported as recurring findings within the PRC's system from previous audits.

In response, in July 2011, the PRC submitted, two manuals, *Inspection Quarantine Manual for Poultry Exported to America (IQMPES)* and *Microorganism Monitoring Program for Export Poultry Products (MMEPP)*, for implementing consistent inspection and verification activities of the systems across provinces that have establishments identified as eligible to export poultry products to the U.S. The CCA trained the inspectors assigned to eligible establishments on these manuals to maintain consistency in the implementation of inspection procedures across all the provinces.

In the 2013 audit, the CCA identified one province (Shandong) with three branch CIQ Offices as having four eligible slaughter establishments to export poultry products to the U.S. The auditors noted that the CCA revised the manuals previously provided to FSIS in the 2011 response creating the *Inspection and Quarantine and Monitoring Manual for Poultry Exported to America (IQMMPEA)*, and the *Microorganism Monitoring Program for Export Poultry Products (MMEPP)*. The auditors confirmed that the CCA had disseminated the two newly revised manuals, *IQMMPEA* and *MMEPP*, to the CIQ offices and establishments and reviewed training records for inspection personnel at the provincial CIQ, and local CIQ offices. In addition, during the audit, the PRC submitted revisions to the *IQMMPEA* and *MMEPP* changing the name, content, and versions numbers of both manuals while improving many sections. The inspection manual has been changed to "*Inspection Quarantine and Supervision Work for Poultry products Exported to the U.S. Handbook*" (*IQSWPPEUH version 1.1*). The microbe manual has been changed to "*Monitoring Program for Microbes in Export Poultry Products*" (*MPMEPP version 1.0*).

In 2010, the auditors reported that the CCA and CIQ authorities provided training to CIQ officials on food safety, sampling procedures, export requirements, sanitation, Hazard Analysis and Critical Control Point (HACCP), and ante mortem and post mortem inspection and had provisions for on-going training. The CIQ also provided training to CIQ contracted veterinarians and establishment-paid inspectors on ante-mortem and post mortem inspection. All newly hired personnel completed initial training and, after an initial evaluation, received on the job training prior to reporting to their final assignments. However, the auditors noted that CIQ in-plant officials did not demonstrate an ability to oversee the implementation of HACCP and

microbiological testing programs. Furthermore, the CIQ contracted veterinarian and the establishment-paid inspectors conducting post mortem inspection did not recognize some pathological lesions. While the auditors observed that the inspection system has provisions for training of personnel, these findings indicated that employee training was not adequate to ensure consistent performance of food safety related oversight activities. In response, the CCA provided training to inspection staff on ante-mortem and post mortem inspection, HACCP, Sanitation Standard Operating Procedures (SSOP), *Listeria monocytogenes (Lm)*, and sanitation activities in 2012 to maintain consistency in the implementation of inspection procedures. The CCA also developed the *IQMPES* and *MMEPP*, which provide uniform requirements for the performance of inspection procedures and uniform requirements for implementation of microbiological controls at poultry slaughter establishments, respectively.

In 2013, the auditors noted that the CCA revised the manuals creating the *IQMMPEA* and *MMEPP*. The auditors interviewed CCA officials and CIQ officials, supervisors, and in-plant staff on the contents of the two revised manuals, ante mortem and post mortem inspection procedures, HACCP, sanitation, microbiological hazards for products, microbiological sampling and testing, and veterinary drugs prohibited for use in poultry product destined for the U.S. for human consumption. The FSIS auditors confirmed that CIQ in-plant personnel had received training on the fundamentals of the aforementioned inspection activities. Furthermore, the auditors observed that CIQ personnel were able to identify and evaluate the adequacy of the components of the written HACCP program maintained by the establishments and were knowledgeable of in-plant microbiological verification sampling procedures. CIQ officials also displayed the ability to perform ante mortem and post mortem inspection procedures and monitoring of sanitation programs. In-plant personnel also demonstrated knowledge of the mechanisms currently in place to ensure control of chemical residues in poultry as well as the measures that would be implemented to prevent prohibited drug residues in the tissues of flocks that would be slaughtered to supply the U.S. market.

Regarding inspector personnel recognition of avian pathological lesions, the CCA officials stated that all CIQ inspectors have a veterinary background and degrees in veterinary science. The auditors interviewed the CIQ inspectors who demonstrated academic knowledge of various avian pathological lesions for various poultry diseases. The auditors also conducted a 10-bird pre-chill sample of inspected birds. The evaluation of the 10-bird sample and online observation demonstrated that the CIQ inspectors have the ability and knowledge to conduct post mortem inspection of the birds presented. The FSIS auditors also interviewed supervisory personnel to verify their ability to assess the competence of their subordinates. The interviews made evident that CIQ supervisors were knowledgeable of employee performance evaluation methodology, and had evaluated the competence of their subordinates.

The results of this verification activity demonstrate that in-plant personnel received training to conduct HACCP program evaluations, microbiological sampling, and ante and post mortem inspection. Their performance has been evaluated and supervisors and subordinates possess knowledge, skills, and ability to perform their inspection duties. FSIS auditors conclude that the CCA has adequately implemented the proffered corrective action related to the competence of inspection personnel providing government oversight.

### Post Mortem Inspection System:

In 2010, the auditors reported that the CCA lacked a standardized method to conduct post mortem inspection based on objective measurements such as production line rates, inspection workloads, and line configuration. As part of the efforts to resolve this matter, FSIS shared with the PRC in letters dated November 21, and December 22, 2011, the following:

For chickens: Implement measures described in 9 CFR 381.76, which provides three post mortem inspection systems for chickens 1) Streamlined Inspection System, 2) New Line Speed, and 3) Traditional Inspection.

For ducks: Implement measures described in 9 CFR 381.67, pertaining to Traditional Inspection, which requires that each inspector inspect the inside, outside and viscera of the same bird at the following line speeds:

- a) For 1 inspector, the line speed is 25 bpm (birds per minute);
- b) For 2 inspectors the line speeds 23 or 21 bpm per inspector depending on distance between the birds on the inspection line;
- c) For 3 inspectors the line speed is 19 bpm per inspector

In response as a corrective action in a letter dated February 17, 2012, AQSIQ stated, “in accordance with relevant food safety laws in China, exported food products should comply with the requirements of importing countries. Therefore, the Chinese side will control the speed of the production line in accordance with the relevant requirements of 9 CFR 381.67 and 381.76. Slaughter and processing establishments that fail to meet the requirements will not be allowed to export their poultry products to the United States.”

FSIS regulation 9 CFR 381.67 specifies the maximum inspection rates under traditional inspection. It provides maximum production line rates based on line configuration determined by a distance of 6-inch intervals between inspected birds, the number of inspection stations, and the number of birds per minute. FSIS regulation 9 CFR 381.76 describes five systems of poultry post mortem inspection that include two types applicable for chicken slaughter, Stream Line Inspection System (SIS) and New Line Speed (NELS). There are two variations of SIS. In SIS-1, one inspector inspects a maximum of 35 birds per minute. SIS-2 requires two inspectors on the slaughter line each inspecting 35 birds for a maximum line speed of 70 birds per minute. The NELS system requires three inspectors on the slaughter line that can run at a maximum of 91 birds per minute. In both SIS and NELS, one inspector inspects the viscera, body surface, and body cavity of a single bird. Specifications for facility requirements for SIS and NELS are provided in 9 CFR 381.36.

In 2013, the CCA identified one province (Shandong) with four branch CIQ Offices as having four eligible poultry slaughter establishments that met the requirements to export poultry products to the U.S. FSIS audited those four slaughter establishments to verify that the CCA had implemented the proffered response to use FSIS 9 CFR 381.67 and 9 CFR 381.76 to address development of a standardized method of post mortem inspection that included production line rates, inspection workloads, and line configuration.

During an on-site assessment of post mortem inspection activities, the auditors observed that the CCA had not implemented FSIS 9 CFR 381.67 and 9 CFR 381.76 and had no uniformity of post mortem inspection activities, inspection station sequence, bird presentation, line speed, or inspection station design across the four slaughter establishments.

The auditors observed that the production line rates and inspection sequence were as follows:

- One chicken plant line speed was 60 birds per minute (bpm), hung by the feet, and that one inspector examined viscera (V), one inspector examined the body surface (BS) and one inspector examined the body cavity (BC) per bird.
- One chicken plant line speed was 66 bpm, hung by the head, and inspection sequence was V-BC-BS.
- One duck plant ran at 20 bpm, hung by the head, and inspection sequence was BS-V-BC.
- One duck plant ran at 35 bpm, hung by head and feet with the cloacae facing the inspector, and inspection sequence was BS-V-BC.

The auditors observed that these types of variations in the post mortem inspection procedure prevented inspectors from assessing the health of the birds based on the evaluation of the entire bird and its viscera. In instances in which viscera was harvested prior to inspection of the body cavity and outer surfaces, the inspectors were prevented from correlating any lesions found in the viscera with lesions found in the carcass and could not provide for condemnation of the viscera associated with carcasses that would be condemned. Therefore, these procedures prevented sound determination of the whole bird or portions of the bird warranting condemnation. FSIS presented this observation to the CCA, and the CCA responded that the inspectors could focus better on their inspection tasks by having to evaluate only one aspect of the post mortem inspection procedure. They further added that the good health status of the flocks permitted this approach. However, this practice is not consistent with FSIS regulatory measures that require that one person inspects the viscera, body surface, and body cavity of each bird. Therefore, PRC will have to make changes to ensure that each carcass receives adequate inspection.

Regarding bird presentation, the auditors observed that there were three types of presentation of birds at the four establishments. Birds were either hung by the head, hung by the feet, or hung by head and feet with the cloacae facing the inspector. When birds were hung on every shackle the CIQ inspectors could not adequately examine each bird for their respective post mortem inspection responsibility, i.e. viscera, cavity, or body surface inspection.

The auditors also noted that inconsistencies in the design of the inspection stations limited the ability of the inspectors to perform their duties. Observations made on-site revealed that the orientation of the light beam provided at the stations did not reach the entire body cavity to provide shadow free lighting to permit clear unobstructed view of the birds for post mortem inspection. Furthermore, the auditors observed that not all the inspection stations were equipped with required functioning stop/start buttons at the establishments. When carcass presentation problems occurred on the line, the inspectors could not stop the lines; thus, they did not inspect all birds to keep up with the flow of the line speed. Additionally, inspection stations were not equipped with hangback racks within easy reach of the establishment helper. The auditors observed instances in which helpers abandoned their station to transport carcasses to offline reconditioning stations, leaving the inspector to work without a helper. The hangback racks are

used to set aside birds that require either further veterinary disposition or trimming. In one plant, the inspection station was not designed with a platform that was adjustable and could be safely accessed. In addition, selectors or ‘kickouts’ were not installed in any establishments, so there was no mechanism in place to ensure that each inspector received birds on 12-inch centers with no intervening birds to impede inspection.

The placement of birds on every shackle, inconsistencies with inspection methodologies, bird presentation, inspection station sequence, and line speeds could compromise identification of disease and pathology in birds during post mortem inspection. The problems were magnified in establishments with higher line speeds, when company presenters did not present each bird properly preventing a thorough examination by the CIQ inspector.

In May 2013, during the report writing phase, AQSIQ submitted three documents: 1) *Operation Rules on Postmortem Inspection of Poultry Exported to U.S. (ORPMIPEUS)*, 2) *Post-Mortem Validation Report of establishment 3700/03416, Zhongao Group Slaughter House*, and 3) *Chart Describing Four Post-mortem Inspection Configurations*. FSIS analyzed the documents and the *IQSWPPEUH version 1.1* and found that they contained variations in post mortem inspection alternatives that were not described in the *IQSWPPEUH version 1.1*. The *ORPMIPEUS* appears to be a supplemental document to the manual (*IQSWPPEUH version 1.1*) which outlines descriptive post mortem inspection procedures which are inconsistent with the manual Section 3.3.2.3 *et seq.*

In the *IQSWPPEUH version 1.1* and the *ORPMIPEUS* the CCA describes two types of post mortem inspection: Alternative 1 and Alternative 2. Neither document identified which Alternative is applicable to each type of bird (chicken or ducks). Furthermore, Sec 3.3.2.3.1 of the *IPQSWPPEH version 1.1* manual and the *ORPMIPEUS* are inconsistent with each other. The *IPQSWPPEH version 1.1* does not specify the responsibilities of each one of the inspectors for both Alternative 1 and Alternative 2, while the *ORPMIPEUS* does as described below.

Alternative 1

- Three on line inspectors inspect a maximum of 91 bpm
- One inspector inspects the inside of birds, a second one the viscera, and a third one the outside of the birds
- Each inspector is flanked by one presenter and one helper
- One off-line veterinarian will verify adequacy of on-line inspection

Alternative 2 (this configuration is in accordance with 9 CFR 381.76)

- There are no more than three inspectors on line
- Each inspector inspects the outside, viscera, and inside of all birds.
- Each inspector inspects a maximum of 35 bpm
- One off-line veterinarian will verify adequacy of on-line inspection

In May 2013, FSIS informed the CCA about the inconsistencies regarding the post mortem inspection Alternatives. On June 17, 2013, AQSIQ responded with a letter stating the following: “Currently, China has two types of post mortem inspection methods. 1) With a production line speed at 91 birds/ per minute, three inspectors inspect cavity, offal, and carcass surface respectively on each slaughtered bird; 2) With a production line speed at 35 birds per minute, one inspector inspects all the three items. The current four Chinese plants intending to export to

the United States use the first type of post mortem inspection. During the production procedure, actual speed will be fixed based on plants' processing technology requirements (visceral downward and cavity downward), post mortem inspectors' proficiency, and necessary time to meet the requirement of inspecting every carcass." AQSIQ also stated that all plants use Alternative 1 as described in the letter dated June 17, 2013, which is not in agreement with their response provided in the letter dated February 17, 2012, nor is it consistent with FSIS regulations 9 CFR 381.67 and 381.76 where one person inspects the viscera, body surface, and body cavity. Therefore, PRC will have to provide justification for Alternative 1 to demonstrate that it provides the same outcome as per FSIS 9 CFR 381.67 and 9 CFR 381.76 for food safety.

In the June 17, 2013 letter, AQSIQ also discussed a second Alternative of post mortem inspection, which states, "With a production line speed at 35 birds per minute, one inspector inspects all the three items." This description is in close alignment with the fundamental measures described in FSIS 9 CFR 381.76 for SIS where one inspector inspects the outside, inside, and viscera of each bird at 35 birds per minute. 9 CFR 381.76 also denotes specific facility requirements that must be met as described in 9 CFR 381.36 (c). Correspondingly, Section 5.1 of the *ORPMIPEUS* submitted by CCA also states that the facility shall be equipped in accordance with the requirements of 9 CFR 381.36, with emphasis on inspector platforms, lighting, hangback racks, and start/stop buttons. Furthermore, Section 5.3.8 of the *ORPMIPEUS* addresses reinspection at prechill and postchill to measure Cumulative Sum (CUSUM) against finished product standards (FPS) to ensure compliance of the final product in accordance with 9 CFR 381.76. Section 3.3.2.4 of the *IQSWPPEUH version 1.1* also provides instruction to inspection personnel and establishment personnel on FPS requirements. However, AQSIQ had not stated that this Alternative (line speed at 35 birds per minute, one inspector inspects all the three items) of post mortem inspection discussed in the June 17<sup>th</sup> letter would be used in the four slaughter establishments intending to export to the United States.

The verification activities conducted in 2013 by the FSIS auditors indicate that the PRC's poultry slaughter inspection system is organized and administered by the national government. The CCA has adequately addressed the findings reported in 2010 regarding the hiring of official government employees and training those employees to conduct post mortem inspection activities. The CCA proffered to use FSIS 9 CFR 381.67 and 9 CFR 381.76 as a standardized method for production line rates, inspection workloads, and line configuration. However, the FSIS auditors observed that the PRC had not implemented the proffered corrective actions. In addition, the CCA developed and inserted into their inspection manual two Alternatives for post mortem inspection. As reported above, Alternative 1 is not consistent with either FSIS regulations 9 CFR 381.67 or 381.76, while the description for Alternative 2 is in close alignment with the fundamental measures of FSIS 9 CFR 381.76 for SIS where one inspector inspects the outside, inside, and viscera of each bird at 35 birds per minute. However, the PRC has stated that Alternative 1 (line speed at 91 birds/ per minute, three inspectors inspect cavity, offal, and carcass surface respectively on each slaughtered bird) is used in all four slaughter establishments intending to export to the United States. Therefore, PRC will have to provide justification that the observed post mortem inspection system seen in the establishments provides the same outcome as per FSIS 9 CFR 381.67 and 9 CFR 381.76 for food safety. FSIS concludes that the PRC's inspection system does not currently meet the requirement for this equivalence component.

## 6. STATUTORY AUTHORITY AND FOOD SAFETY REGULATIONS

The second of the six equivalence components reviewed by FSIS was Statutory Authority and Food Safety Regulations. This component pertains to the legal authority and the regulatory framework utilized by the CCA to impose requirements equivalent to those governing the system of poultry slaughter inspection organized and maintained in the U.S. Based on the analysis of the corrective actions submitted by the PRC in response to the 2010 audit and the results of the current verification activities conducted in the 2013 audit, FSIS concludes that the PRC has not implemented the proffered corrective action to use FSIS 9 CFR 381.67 and 9 CFR 381.76 as a standardized method for production line rates, inspection workloads, and line configuration. In addition, review of documentation and on-site observation, FSIS cannot determine equivalence based on aforementioned factors. Therefore, the CCA does not meet equivalence for this component.

During this audit, FSIS auditors confirmed the 2010 audit report that the inspection system provided requirements for poultry slaughter inspection activities, establishment construction, control over inedible and condemned materials, as well as daily inspection and periodic supervisory reviews of official establishments, remained in place.

In 2010, the auditors observed that CIQ officials provided continuous inspection to the slaughter establishments, ensured separation of domestic and exported products, and conducted periodic supervisory visits. CIQ officials also verified that the required health certificates, in addition to a grower's affidavit for good management practices, accompanied each lot of birds slaughtered. The FSIS auditors verified that these conditions continued to exist in 2013.

In 2010, the auditors observed that the establishment-paid employees conducted bird-by-bird ante mortem inspection, and segregated diseased or abnormal birds for the veterinarian in charge to examine and make final dispositions. FSIS auditors concluded that this arrangement constituted a conflict of interest as it did not meet the requirements for the CCA to have ultimate control and supervision over the official activities of all employees or licensees of the system, as articulated in the FSIS import regulations (9 CFR 381.196). As a corrective action, AQSIQ proposed to employ government officials to conduct ante mortem inspection.

In 2013, the auditors confirmed that the employment records demonstrated that personnel conducting ante mortem inspection were employees of the Chinese government. The CCA hires and utilizes official employees to conduct all inspection duties. Both the CIQ Entry-Exit Inspection and Quarantine Bureau and the CIQ Livestock Bureau hire and retain employee records for staff assigned to work at the establishments that the CCA has identified as eligible to slaughter poultry to be processed as products destined for the U.S. Employees are issued ID cards, with or without photos, and assigned specific numbers that correlate to the respective CIQ Bureau database. FSIS confirmed that this conflict of interest involving establishment-paid officials conducting inspection activities was resolved.

In 2010, the auditors observed that oil glands and heads were not removed from carcasses prior to shipment from slaughter establishments identified by the CCA as meeting U. S. standards. This practice is permissible within the PRC but presented an equivalence concern where FSIS'

standards for Ready-To-Cook (RTC) poultry require the removal of these portions of the bird. This finding indicated that the establishments and the CCA were not knowledgeable of U. S. requirements that pertain to finished product standards and FSIS's definition of RTC poultry. In response, AQSIQ indicated that it would incorporate FSIS' definition of RTC that is in 9 CFR 381.1 into the inspection manual. In 2013, the auditors confirmed that CIQ officials were knowledgeable of the RTC standard and verified that plant management had the ability to prepare carcasses that met FSIS' definition for RTC. In addition, auditors verified that the *Inspection and Quarantine and Monitoring Manual for Poultry Exported to America (IQMMPEA)* had been updated to include the RTC definition verbatim from 9 CFR 381.1. This manual had been distributed to the Provincial CIQ, three Branch CIQ Offices, and the four establishments identified by the CCA as eligible to export poultry products to the U.S., all within Shandong province. Subsequently, the PRC updated the manual changing the name, content, and version number to *IQSWPPEUH version 1.1*. The RTC definition remained intact in this version.

In 2010, the auditors verified that the CCA implemented national standards in the GB/T20094-2006 and GB 16869-2005 on post mortem inspection that identify the pathological conditions necessitating removal. These standards provide a comprehensive list of disease conditions for which poultry carcasses are to be condemned. However, FSIS auditors observed that the CIQ contracted veterinarians and establishment-paid inspectors failed to identify pathological lesions associated with inflammatory process (cellulitis), and that the affected carcasses were chilled and processed without the removal of these lesions. Furthermore, the auditors observed that there was a significant degree of variation in both inspection methodology and the manner in which carcasses were presented for post mortem inspection.

In response to this finding, in 2012, AQSIQ trained the inspectors on post mortem inspection procedures and poultry diseases. During the 2013 audit, the CCA officials stated that all CIQ inspectors have a veterinary background and degrees in veterinary science. The auditors interviewed the CIQ inspectors who demonstrated academic knowledge of various avian pathological lesions for various poultry diseases. The auditors also conducted a 10-bird pre-chill sample of inspected birds. The evaluation of the 10-bird sample and online observations demonstrated that the CIQ inspectors have the ability and knowledge to conduct post mortem inspection of the birds presented. The FSIS auditors also interviewed supervisory personnel to verify their ability to assess the competence of their subordinates. The interviews made evident that CIQ supervisors were knowledgeable of employee performance evaluation methodology and had evaluated the competence of their subordinates.

In 2010, the auditors reported that the CCA lacked a standardized method to conduct post mortem inspection based on objective measurements such as production line rates, inspection workloads, and line configuration. In 2013, the auditors observed that the lack of standardized methods remained in place. During the auditor report writing phase, the auditors analyzed manuals, supplemental documents, and letters submitted by the PRC in May and June 2013. A detailed analysis is presented in the Government Oversight Component section of this report. The conclusion was that the PRC had not implemented the proffered corrective action to use FSIS 9 CFR 381.67 and 9 CFR 381.76 as a standardized method for production line rates, inspection workloads, and line configuration.

While the PRC provides a statutory framework outlining the requirements of its poultry inspection system, the current audit resulted in a finding that the CCA did not implement proffered corrective actions to use FSIS 9 CFR 381.67 and 9 CFR 381.76 as a standardized method for production line rates, inspection workloads, or line configuration. Nor did it adopt an equivalent method for establishing these fundamental aspects of an inspection system. Therefore, FSIS concluded that the PRC's inspection system does not meet the requirement for this equivalence component.

## 7. SANITATION

The third of the six equivalence components reviewed by FSIS was sanitation. FSIS requires that the inspection system provide requirements for sanitation, for sanitary handling of products, and for the development and implementation of sanitation standard operating procedures. In the 2010 audit, there were no major findings with this component and FSIS concluded that the CCA had effectively implemented its requirements for sanitation and sanitary handling of poultry products intended for export to the United States. As a result, the PRC met the requirements for this equivalence component. In the 2013 audit, the auditors verified this observation and concluded that there are no concerns. Therefore, the PRC's poultry slaughter inspection system meets this component of FSIS equivalence criteria.

In 2010, the FSIS auditors reviewed legislation, regulations, and official instructions and confirmed that the CCA exercised its legal authority to require establishments to develop and implement sanitation programs and ensure sanitary handling of products. The auditors found that the establishments were maintaining sanitary conditions in accordance with AQSIQ Directive No. 20, 2002: *Regulation on Administration of Sanitary Registration and Enrollment for Establishments of Food for Export* and GB/T 20094-2006, AQSIQ National Standard: *Code of Hygienic Practice for Registration on Abattoir and Meat Processing Establishments*. In 2010, the auditors observed that the CCA required establishments to conduct biannual sanitation audits, as required by the PRC regulation. During review of the biannual sanitation audit records, FSIS suggested improvements for in-depth reviews of these audits.

During the 2013 audit, FSIS auditors found no systemic issues with this component. Establishments identified, documented, and corrected sanitation deficiencies noted during pre-operational and operational inspection. The *IQMMPEA* inspection manual had been distributed to the government offices and establishments. The PRC updated the manual, which contains instructions to officials regarding evaluation of operational and pre-operational sanitation activity and includes form *Authoritative Inspection Record Before Start for Slaughtering Enterprise* to document the results of preoperational facility reviews. The inspectors document noncompliance observations on form *On-site Processing Procedures Supervision Record*. This form remained intact in the revised *IQSWPPEUH version 1.1* manual. CIQ officials effectively verified the adequacy of the implementation of the sanitation program, documented their findings, and verified adequacy of the corrective actions. The FSIS auditors conducted onsite observations of the facilities and operational activities and concluded that, overall, the establishment's facilities were well maintained and in good repair, and that sanitary controls were effectively implemented to prevent the development of insanitary conditions.

FSIS concludes that the CCA effectively implements its requirements for sanitation and sanitary handling of poultry products intended for export to the United States. As a result, the PRC meets the requirements for this equivalence component.

## **8. HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM**

The fourth of the six equivalence components reviewed by FSIS was HACCP systems. The inspection system must require that each official establishment develop, implement, and maintain a HACCP plan. Based on the analysis of the corrective action submitted by the PRC in response to the 2010 audit and the results of the verification activities conducted in the 2013 audit, FSIS concludes that the CCA has adequately addressed the previously identified concerns with this equivalence component. Therefore, the PRC's poultry slaughter inspection system meets FSIS equivalence criteria for this component.

In 2010, the auditors evaluated the design and implementation of HACCP programs based on the regulatory requirements prescribed in GB/T 19538-2004, *AQSIQ HACCP System and Guidelines for its Application*, 2004; and SN/T 1252-2003, *HACCP System and Guidelines for its Application and the 2009 Food Safety Law*. One significant finding identified by the FSIS auditors is that the national standard, GB/T 19538-2004, did not require food producers to establish measures to prevent recurrence in response to a deviation from the critical limit. This does not meet FSIS' equivalence criteria applied to foreign HACCP systems, which are based on the requirements found in 9 CFR 417. In response in 2011, the CCA included in the *IQMPES* a requirement for establishments to address preventive measure when a deviation occurs.

In 2013, PRC revised the previous manual creating *IQMMPEA*. The auditors verified the implementation of the corrective actions proffered by the CCA by reviewing HACCP monitoring records maintained by the government and the establishments, which included preventative measures for the deficiencies documented. During the report writing phase PRC updated the manual changing the name to *IQSWPPEUH version 1.1*. Appendix three of the *IQSWPPEUH version 1.1* includes provision for documenting preventive measures.

In 2010, the auditors reported that the HACCP plan at slaughter establishments had established a critical control point for zero tolerance as the limit for septicemic/toxemic carcasses, fecal contamination, and several processing/trimming deficiencies and inflammatory process lesions (cellulitis) on carcasses. However, the HACCP monitoring activities were inadequate to detect that the critical limit was not being met. Furthermore, government officials had not adequately verified the adequacy of implementation of the HACCP plan. In response to this finding, in 2012 and February 2013, AQSIQ trained the inspectors on post mortem inspection procedures and poultry diseases, the fundamentals of HACCP, U.S. requirements, and the contents of the revised manuals.

During the 2013 audit, the CCA officials stated that all CIQ inspectors have a veterinary background and degrees in veterinary science. The auditors interviewed the CIQ inspectors who demonstrated academic knowledge of various avian pathological lesions for various poultry diseases including inflammatory process lesions, and the government officials had a good

understanding of the fundamentals of HACCP requirements including monitoring for zero tolerance for fecal contamination. The establishments had included in their HACCP plans a critical control point for zero tolerance for fecal contamination, as mandated by the CCA, which the government officials were verifying. In addition, PRC has included verification for finished product standards (FPS) in the *IPQSWPPEH version 1.1* manual Section 3.3.2.4.1. Establishment personnel conducted FPS activities and documented the findings on a CUSUM record while the government officials verified the activity. The auditors evaluated the carcasses that had passed FPS and found that they did not have inflammatory process lesions.

Based on the analysis of the corrective action submitted by the PRC in response to the 2010 audit and the results of the verification activities conducted in the 2013 audit, FSIS concludes that the CCA has adequately addressed previously identified concerns reported with this equivalence component. Therefore, the PRC's poultry slaughter inspection system meets FSIS equivalence criteria for this component.

## 9. CHEMICAL RESIDUES

The fifth of the six equivalence components reviewed by FSIS was Chemical Residues. The inspection system must have a chemical residue control program, organized and administered by the national government that includes random sampling of internal organs and fat of carcasses for chemical residues identified by China's meat and poultry inspection authorities and by FSIS as potential contaminants as well as methods to deter recurrence of chemical residue violations. Based on the conclusion in the 2010 audit and the current 2013 audit, FSIS concludes that there are no issues with this equivalence component. In addition, AQSIO is knowledgeable of the compounds that are prohibited for use in poultry destined for the U.S., and the system has the ability to implement controls to ensure that slaughter establishments and poultry producers adhere to U.S. requirements. Therefore, the PRC's poultry slaughter inspection system meets this component.

The PRC's responsibilities for the control of chemical residues in food are grounded in the FSL 2009, which requires that national residue standards be established, prohibits production and trading of food with violative levels, and calls for legal prosecution of food producers and traders who violate these standards. In the 2010 audit, FSIS reviewed the FSL 2009 requirements, including the *2009 China Animal and Animal-derived Food Residual Substance Monitoring Report*, the *AQSIO 2010 Animal-derived Food Residual Substance Monitoring Plan*, and the GB/T 27025-2008/ISO/IEC 17025: 2005, which prescribe the requirements for laboratory quality systems. The auditors concluded that laboratory personnel were qualified, adequately trained, and capable of conducting analytical methods, and the residue laboratories demonstrated the ability to produce timely and accurate data. However, the auditors found that the carbadox detection method was not validated for the poultry matrix. In response, AQSIO provided quality control charts for carbadox testing method on poultry tissue. FSIS accepted the results and thus concluded that the carbadox method was validated for the poultry tissue. As no other issues were identified with the laboratory quality systems, in the 2013 audit, the auditors did not audit the chemical testing laboratories.

In January 2013, the New York State Department of Agriculture and Markets (NYSDAM), detected in chicken jerky pet treat products originating from China, violative levels of residues

for five different antibiotics. Four of them, sulfaclozine, tilmicosin, trimethoprim, and enrofloxacin were not approved for use in poultry for human consumption in the U.S., and the fifth one, sulfaquinoxaline, was approved for use in poultry for human consumption in the U.S. but was found at a level exceeding the Maximum Residue Level (MRL) in chicken jerky pet treats. Because of this finding, FSIS included in the 2013 audit further inquiries of the CCA in the use of the five prohibited compounds as related to poultry product for human consumption destined for the U.S.

FSIS auditors discussed with AQSIQ officials, U.S. requirements for drug residue controls, specifically the MRL for drugs approved for use in poultry in China and drugs prohibited for use in poultry in the U.S. including sulfaclozine, tilmicosin, trimethoprim, enrofloxacin, and sulfaquinoxaline. AQSIQ had distributed a letter to the provincial CIQ offices to ensure that flocks slaughtered to produce poultry products to be exported to the U.S. do not contain residues of the five compounds identified in pet treats (sulfaclozine, tilmicosin, trimethoprim, enrofloxacin, and sulfaquinoxaline). CIQ personnel were knowledgeable of the compounds that are not authorized for use in poultry in the U.S.

FSIS auditors conducted interviews and reviewed documents to determine the level of awareness that AQSIQ officials have related to U.S. requirements for drug residue controls, specifically the MRL for drugs approved for use in poultry in China and drugs prohibited for use in poultry in the U.S. The CCA indicated that the poultry industry that exports poultry products, including establishments, feed mills and farms, participate in programs designed to control use of veterinary drugs. CIQ officials assigned to oversee those facilities perform verification activities that evaluate the effectiveness of the controls. Operators of farms use veterinary drugs that CIQ has approved and in accordance with the guidelines provided by the veterinarians of the company that are in charge of maintaining compliance. CIQ officials at the establishments collect tissue samples for the detection of drug residue that the National Residue Control plan has identified.

The auditors interviewed the CIQ veterinarians stationed at the audited slaughter establishments and found that they visit the farms to ensure that the production practices comply with the regulations of the system. The *IQMMPEA* issued by the CCA describes the verification activities that the CIQ veterinarian is to conduct on the farms before the birds are sent to slaughter, to verify that the flock houses document administration of all drugs for poultry health and vaccination, and that they use only authorized animal feed. This information is also included in the *IQSWPPEUH version 1.1* Section 3.3.2.2 and documented on form *Supervision Record of Registered Breeding Farm Export Poultry Meat Material* found in Appendix 2 of the manual. In addition, flocks arriving to the establishments are accompanied by another set of documents consisting of the *Animal Quarantine Qualified Certificate* and the *Breeding Journal and Medication Records*, which provide assurance to the establishment operator that the birds arrive from a certified producer and have been treated in a manner that adheres to drug withdrawal schedules as required by AQSIQ. Government inspectors who conduct ante mortem inspection review those documents before authorizing slaughter of the flocks. For poultry intended for human consumption, the PRC has structured a system of recordkeeping requirements for veterinary drug use, including U.S. prohibited drugs, in the flock houses and mandate

government oversight to ensure that flock houses and establishments adhere to U. S. requirements.

Based on the conclusion in the 2010 audit and the current 2013 audit, FSIS concludes that there are no issues with this equivalence component. In addition, AQSIQ is knowledgeable of the compounds that are prohibited for use in poultry destined for the U.S., and the system has the ability to implement controls to ensure that establishments and producers adhere to U.S. requirements. Therefore, the PRC's poultry slaughter inspection system meets this component.

## 10. MICROBIOLOGICAL TESTING PROGRAMS

The last of the six equivalence components reviewed by FSIS was Microbiological Testing Programs. This component pertains to the regulatory requirement for the inspection system to have a microbiological testing program, organized and administered by the national government. The principal criteria used by FSIS to assess a foreign country's microbiological testing programs for raw poultry include:

1. The inspection system provides for a sampling and testing program for generic *E. coli* in raw product and uses the test results to verify establishment slaughter processing and dressing controls for fecal contamination.
2. The inspection system provides for a sampling and testing program for *Salmonella* spp. and *Campylobacter* in raw product and includes performance standards for each pathogen. The inspection system achieves pathogen reduction by ensuring that all slaughter and ground product establishments meet the *Salmonella* and *Campylobacter* performance standards.

In 2010, the auditors reviewed the Food Safety Law (FSL) 2009, GB/T 20094-2006, *AQSIQ Directive No. 20, 2002*, *AQSIQ Order No. 26 2002* and GB/T 27025-2008/ISO/IEC 17025: 2005. In addition, the auditors assessed the microbiological testing programs at the CIQ offices, government laboratories, and poultry slaughter establishments.

In 2010, the auditors verified that the government offices had an acceptable level of proficiency in coordinating the reporting of test results, applying microbial performance standards, and taking appropriate enforcement actions in response to non-conforming product. Furthermore, the auditors verified that the laboratories possessed the technical capacity to ensure that accurate testing of product destined for the U.S. would occur. The FSIS auditors determined that the PRC's microbiology testing laboratories are well equipped to provide technical support to the poultry inspection system, and that laboratory management was familiar with the FSIS testing requirements. In 2013, the auditors did not visit the laboratories because the previous 2010 finding was acceptable.

In 2010, the audit methodology applied at the slaughter establishments was similar to that of laboratories, as export to the U.S. had not yet occurred. The auditors were required to assess the level at which an FSIS-equivalent application of microbiological testing would occur once export for the U.S. commenced. In this sense, the auditors were provided with little information upon which they could make this judgment, which was limited to the observation of the procedures for

the rinsing of poultry carcasses, and the review of *Salmonella* testing conducted for other countries in accordance with GB Standard 16869-2005, *Fresh and Frozen Poultry Products*. The auditors observed inconsistencies in product sampling locations and sample collection techniques at the slaughter establishments.

In July 2011, the CCA created the *MMEPP* manual, which served as instructions to the CIQ personnel for sampling carcasses at the establishments producing product for U.S. export. The manual contains carcass rinsing procedures, *Salmonella* spp performance standards, and criteria for evaluating generic *E. coli* test results as outlined in 9 CFR 381.94 and *Campylobacter* performance standards as per the Federal Register Notice published on March 23, 2011. In 2012, the CCA provided training to inspection personnel on the requirements and procedures contained in the manual.

In 2013, the auditors verified that the manual was distributed to the Shandong Province CIQ Offices and four slaughter establishments identified as eligible to export poultry products to the U.S. In addition, the auditors verified that the procedures contained in the manual were uniformly implemented in the four slaughter establishments. The CIQ inspectors and plant personnel were referencing the manual. In May 2013, AQSIQ updated the manual changing the name to *MPMEPP version 1.0*. The manual contains information on carcass-rinsing procedures, testing methods and standards for *Salmonella* spp, generic *E. coli*, and *Campylobacter*, which are the same as FSIS standards, and they remain unchanged in the *MPMEPP version 1.0*. AQSIQ conducts sampling and testing for *Salmonella* spp and *Campylobacter*, while the establishments test for generic *E. coli* and *Salmonella* spp.

Based on the 2013 on-site audit verification, development of the manual and training of CIQ inspectors, FSIS concludes that AQSIQ has the ability to ensure standardized implementation of microbiological testing programs (i.e. carcass sampling locations, sample collection techniques, laboratory testing methods, recording, and evaluation of test results, and adherence to performance standards) at the establishment level.

Therefore, the PRC's poultry slaughter inspection system meets this component.

## **11. EXIT MEETING**

An exit meeting was held on March 19, 2013, in Beijing with AQSIQ. At this meeting, the FSIS auditors presented the preliminary findings of the audit.

## **12. CONCLUSIONS AND NEED FOR FURTHER ACTIONS**

FSIS concluded that the CCA was able to meet the principal requirements for the following equivalence components: (3) Sanitation, (4) HACCP, (5) Chemical Residues and (6) Microbiology.

Findings of greater systemic impact were identified within the equivalence components for: (1) Government Oversight, and (2) Statutory Authority and Food Safety Regulations. These components had an overlapping finding related to post mortem inspection. The CCA had not

implemented the FSIS 9 CFR 381.67 and 9 CFR 381.76 as their proffered corrective action in response to the December 2010 audit finding that would provide a standardized method for production line rates, inspection workloads, and line configuration, including bird presentation and inspection station sequence for the post mortem inspection. PRC will have to make changes to ensure that every carcass receives adequate inspection. FSIS may determine that an additional on-site audit is necessary to verify the adequacy of the post mortem inspection system. Should all outstanding issues be satisfactorily resolved, FSIS will make the recommendations to move forward with the rulemaking process for China's poultry slaughter inspection system.

On November 15, 2013, AQSIQ responded that it intends to make changes to its poultry slaughter inspection system to address FSIS's audit findings. FSIS is evaluating AQSIQ's response, and if FSIS finds that the response appears to adequately address the audit findings, FSIS will conduct an audit to verify that AQSIQ has made the proffered changes to its system.

AQSIQ also sought certain changes to the audit report. AQSIQ stated that the U.S. auditors did not find any products that did not comply with U.S. requirement during their on-site audit in March this year. FSIS did not make changes in responses to this comment because, as the report states, FSIS found during the audit that not every poultry carcass received adequate inspection.

AQSIQ also stated that FSIS should say in the report that the Chinese side invited relevant U.S. expert to come to China to give trainings and exchange views in March 2012, who considered that the Chinese post-mortem inspection method can meet U.S. requirements. AQSIQ pointed out that other countries or areas, including the European Union and Canada, had accepted China's method of post-mortem inspection. FSIS did not add that information to the substantive portion of the report because it is not related to the audit.

Finally, AQSIQ requested that FSIS remove from the audit report information on APHIS requirements. FSIS did not remove this information because it is factual and bears on whether Chinese product would be eligible for export to the U.S.

### **13. ATTACHMENTS TO THE AUDIT REPORT**

- 1) Foreign establishment check list
- 2) Corrective actions received from China

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Qingdao Nine Alliance Group Co. Weihai West Road, Laixi Qingdao, Shandong PRC	2. AUDIT DATE March 7, 2013	3. ESTABLISHMENT NO. 3700/03235	4. NAME OF COUNTRY People's Republic of China
	5. NAME OF AUDITOR(S) Drs. Gonzalez and McGee		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. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

## Slaughter Establishment

## ESTABLISHMENT 3700/03235

This establishment slaughter broilers that are mechanically eviscerated (Meyn). The establishment reports to have the capacity to process 91 birds per minute on one line. On the day of the audit the line speed was: 66 birds per minute.

There are three government inspectors stationed on the line; each inspector flanked by a presenter on one side and a helper on the other side.

- The first inspector inspects viscera of all birds only  
The viscera move in a tray below and in front of the carcass that moves on the line hung by the legs.
- The second inspector inspects only the body cavity of all birds.  
This inspector's stand could not be adjusted to the height of the inspector. The elevated platform did not have attached stairs isolating everyone standing on the platform. The company brings a step stool to the area to allow access to the inspector's station for observation.  
The station was not equipped with on/off switch
- The third inspector inspects the outside surfaces of all carcasses only
- The inspection station was not equipped with an on/off switch.

61. NAME OF AUDITOR

Drs. Gonzalez and McGee

62. AUDITOR SIGNATURE AND DATE

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Shandong Delicate Food Co. Ltd East of Mizhou Road Zhucheng, Shandong PRC	2. AUDIT DATE March 8, 2013	3. ESTABLISHMENT NO. 3700/03260	4. NAME OF COUNTRY People's Republic of China
	5. NAME OF AUDITOR(S) Drs. Gonzalez and McGee		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. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

## Slaughter Establishment

**ESTABLISHMENT 3700/03260**

This establishment slaughters broilers, which are manually eviscerated. The establishment reports to have the capacity to process 83 birds per minute on one line. On the day of the audit the line speed was: 60 birds per minute.

There are three government inspectors stationed on the line; each inspector flanked by a presenter on one side and a helper on the other side.

- The first inspector inspects the **viscera** of all birds only
  - The carcass hangs from the shackle by the head with the viscera still connected to it.
  - The inspection station was not equipped with an on/off switch within easy reach of the inspector. It was placed on the wall approximately 3 feet behind the inspector's station.
- The second inspector inspects **the outside surfaces** of all carcasses only
  - The company presents the outer surfaces of carcasses for inspection, while the birds hang in the shackle by the head. This prevents the inspector from observing areas of the proximal thigh and abdominal flaps. The inspector seldom handled the birds as the presenter turned the carcass for the inspector to view both sides
  - The inspection station was not equipped with an on/off switch.
- The third inspector inspects **the body cavity** of all birds only
  - The company presents the body cavity of every other bird for inspection. At times, the angle in which the presenter held the birds did not allow a good view of the cavity. The inspector inspects the other carcass without assistance from the presenter
  - The inspector is not able to consistently lift the carcass and examine the inside of each bird when all shackles were full and the line ran at 60 birds per minute, consequently, the inspector did not inspect consistently all body cavities.
  - The station was not equipped with an on/off switch
  - The lighting at this station was of less intensity than the other stations

61. NAME OF AUDITOR

Drs. Gonzalez and McGee

62. AUDITOR SIGNATURE AND DATE

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Weifang Legang Food Co. Ltd Honghe Town of Changle County Shandong PRC	2. AUDIT DATE March 12,	3. ESTABLISHMENT NO. 3700/03263	4. NAME OF COUNTRY People's Republic of China
	5. NAME OF AUDITOR(S) Drs. Gonzalez and McGee		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. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

## Slaughter Establishment

**ESTABLISHMENT 3700/03263**

This establishment slaughters ducks, eviscerated manually at a line speed of 35 birds per minute, on one line. The establishment has the capacity to slaughter 30,000 ducks daily.

Three government slaughter-inspectors are stationed on the line

Every inspector was flanked by presenter on one side and a helper on the other side

- The first inspector inspects only the **outside surfaces** of all **un-eviscerated** birds only
- The company provides an on/off switch but it is not within easy reach of the inspector.
- The second inspector inspects **viscera** of all birds only
  - The company does not present the viscera uniformly and when the shackles were full, the inspector was unable to examine the viscera of each bird.
  - The evisceration process does not draw the heart out of the body cavity.
- The station is equipped with an on/off switch but it is not within easy reach of the inspector.
- The third inspector inspects **the body cavity** of all birds only
  - The carcass hangs from the legs and head
  - The inspection station was equipped with an on/off switch, but it is not within easy reach of the inspector.

61. NAME OF AUDITOR

Drs. Gonzalez and McGee

62. AUDITOR SIGNATURE AND DATE

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Zhongao Holdings Group Co. Ltd No. 1999 Central Street Qingyun County, Shandong PRC	2. AUDIT DATE March 14, ----	3. ESTABLISHMENT NO. 3700/03416	4. NAME OF COUNTRY People's Republic of China
	5. NAME OF AUDITOR(S) Drs. Gonzalez and McGee		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. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

## Slaughter Establishment

**ESTABLISHMENT 3700/03416**

This establishment slaughter ducks, eviscerated manually at a line speed of 20 birds per minute, on one line. This establishment did not disclose its total slaughter capacity.

Three government slaughter-inspectors are stationed on the line

Every inspector was flanked by presenter on one side and a helper on the other side

- The first inspector inspects only the **outside surfaces** of all **un-eviscerated** birds only
- The second inspector inspects **viscera** of all birds only
  - The presenter lifts the viscera for the inspector to handle and examine it. The beam of light provided to the station is sent from behind the inspector. This causes the inspector to cast a shadow on his work station if s/he moves in front of the beam.
  - The station is equipped with a switch that appears to be an on/off device, but can only stop the line. The line can't be restarted by the inspector.
- The third inspector inspects **the body cavity** of all birds only
  - The carcass hangs from the head without the viscera. The helper lifts the bird for the inspector to handle it and examine the body cavity. As in the viscera inspection, the beam of light provided to the station is sent from behind the inspector. This causes the inspector to cast a shadow on his work station if s/he moves in front of the beam.

61. NAME OF AUDITOR  
Drs. Gonzalez and McGee

62. AUDITOR SIGNATURE AND DATE

November 15, 2013

**General Administration of Quality Supervision, Inspection and  
Quarantine of the People's Republic of China (AQSIQ)**

Respected Director Andreas Keller:

Re: Comments on U.S. Draft Audit Report on China's Food Safety System  
Governing the Production of Slaughtered Poultry Intended for Export to the  
United States of America

Thank you for providing a draft U.S. audit report on China's food safety system governing the production of slaughtered poultry, which was done in March 2013. The following are our comments after we studied the draft report.

Regarding the issue mentioned in the draft audit report that China's post-mortem inspection system is not in equivalency to the U.S. system, the Chinese side considers that the method of Chinese post-mortem inspection is in equivalency to the U.S. inspection. Chinese post-mortem inspection, where each of three online inspectors is to inspect respectively the surface, cavity and viscera, makes the inspection more professional and extensive. The carcass or viscera of the same poultry can be traced back if any problems found by any online inspectors to ensure condemn of any parts of carcass or viscera of poultry with problem. Combined with the implementation of finished products standard (FPS) and post-chilling carcass inspections of salmonella and campylobacter at the same time, finished products can be guaranteed to satisfy U.S. requirements. The U.S. auditors did not find any products that did not comply with U.S. requirement during their on-spot audit in March this year. Therefore, the Chinese side considers that the Chinese and U.S. post-mortem inspection systems are in equivalency. It is necessary to say that the Chinese side invited relevant U.S. expert to come to China to give trainings and exchange views in March 2012, who also considered that the Chinese post-mortem inspection method can meet U.S. requirements. Other countries or areas, including the European Union and Canada, also accepted China's method of post-mortem inspection.

In order to speed up the process to initiate the export of heated meat to U.S. manufactured from the poultry raised and slaughtered in China, three Chinese Establishments will voluntarily modify the equipments and facilities of post-mortem inspection according to U.S. requirement, such as inspection station, chain, light, start/stop button, and mirror to ensure that one inspector can inspect surface, cavity

and viscera at the same time so as to make the post-mortem inspection to be equal to U.S. requirements.

Meanwhile, some individual problems found by the U.S. auditors during their on-spot audit have been corrected by relevant Chinese Establishments, such as start/stop button too far away from production line, poor lamination of inspection station, improper CCP record, (some part) not easy to clean, and incomplete treatment of positive test of pathogen. Please refer to Appendix 4 for correction report.

Additionally, the last paragraph of the background information in the draft audit report says that USDA/APHIS is conducting a risk assessment on avian influenza and New Castle disease in Shandong province of China. It also says that before USDA/APHIS lifts its relevant disease bans, China cannot export raw poultry meat to the United States. Taking into account that this draft audit report is for China's cooked poultry exported to the United States, the Chinese side suggests the U.S. side to delete the last paragraph of the background information.

We hope that the U.S. side will evaluate China's correction plans and give a feedback as soon as possible and continue its regulatory process to import of Chinese cooked poultry meat manufactured from poultry raised and slaughtered in China so as to start the trade as soon as possible.

Sincerely,

Wang Ning (on behalf)  
Director of the Food Safety Division one  
Import and Export Food Safety Bureau  
General Administration of Quality Supervision, Inspection and Quarantine  
The People's Republic of China

Enclosure:

Appendix 1: Correction Plan based on U.S. Post-Mortem Inspection by Qingdao Nine-Alliance

Appendix 2: Post-Mortem Inspection Correction Plan by Zhong Ao Holding Group, Ltd.

Appendix 3: Post-Mortem Inspection Correction Plan by Weifang/Legang

Appendix 4: Correction Report on Problems Found by U.S. On-Spot Auditors at (Chinese) Establishments

**ADDED STATEMENT BY FSIS: FSIS has withheld the four attachments/appendixes because they contain proprietary information.**