



United States Department of Agriculture

---

Food Safety and  
Inspection Service

AUG 14 2017

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

Dr. Bi Kexin  
The Bureau of Import and Export Food Safety  
The General Administration of Quality Supervision, Inspection and Quarantine of  
the People's Republic of China (AQSIQ)  
9# Madian East Road, Haidian District, Beijing, 100088, P. R. China

Dear Dr. Bi,

The Food Safety Inspection Service onsite audit conducted from July 11 - 22, 2016, supports that China's inspection system continues to remain equivalent to that of the United States. Enclosed is a copy of the final audit report. The comments received from the Government of China are included as an attachment to the report.

If you have any questions, please feel free to contact me directly.

Sincerely,

A handwritten signature in cursive script that reads "Jane H. Doherty".

Jane H. Doherty  
International Coordination Executive  
Office of International Coordination

Enclosure

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

JULY 11 - 22, 2016

EVALUATING THE FOOD SAFETY SYSTEMS GOVERNING  
PRODUCTION OF PROCESSED POULTRY PRODUCTS  
EXPORTED TO THE UNITED STATES OF AMERICA

August 10, 2017

Food Safety and Inspection Service  
United States Department of Agriculture

## **Executive Summary**

This report describes the outcome of an on-site equivalence verification audit conducted by the Food Safety and Inspection Service (FSIS) from July 11 - 22, 2016. The purpose of the audit was to determine whether the People's Republic of China's (PRC's) food safety system governing processed poultry products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and accurately labeled and packaged. The Central Competent Authority (CCA), the General Administration for Quality and Supervision, Inspection and Quarantine (AQSIQ), provided to FSIS a list of establishments it had certified as eligible to export processed poultry products derived from FSIS-approved sources; however, export of those products to the United States has not taken place.

This audit focused on the ability of the CCA to effectively administer its processed poultry inspection system. FSIS' determinations concerning the effectiveness of the inspection system focused on the performance of its six equivalence components: (1) Government Oversight (Organization & Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Points (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

Minor deficiencies identified in the implementation of Government Sanitation and Government HACCP System component requirements were corrected immediately. The audit did not identify any significant findings that represented an immediate threat to public health from the products being manufactured.

## TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY.....	1
III.	BACKGROUND.....	2
IV.	COMPONENT ONE: GOVERNMENT OVERSIGHT (ORGANIZATION AND ADMINISTRATION).....	3
V.	COMPONENT TWO: GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING) .....	5
VI.	COMPONENT THREE: GOVERNMENT SANITATION.....	5
VII.	COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINTS (HACCP) SYSTEM .....	7
VIII.	COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS.....	8
IX.	COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS.....	9
X.	CONCLUSIONS AND NEXT STEPS .....	11
	APPENDICES .....	12

Appendix A: Individual Foreign Establishment Audit Checklist

Appendix B: Foreign Country Response to Draft Final Audit Report

## **I. INTRODUCTION**

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) conducted an on-site audit of the People's Republic of China's (PRC's) processed poultry inspection system from July 11 - 22, 2016. The audit began with an entrance meeting held on July 11, 2016, in Beijing, China, with the participation of the FSIS auditors and representatives from the Central Competent Authority (CCA), the General Administration of Quality Supervision, Inspection and Quarantine (AQSIQ); representatives from China's National Accreditation Service for Conformity Assessment (CNCA); and representatives from China's Inspection and Quarantine (CIQ) from the Shandong and Anhui Provinces.

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

This was a routine ongoing equivalence verification audit. The audit objective was to verify that the PRC's food safety system governing the production of fully cooked not shelf stable poultry products for export to the United States, remains equivalent to that of the United States, with the ability to ensure production of processed poultry products that are safe, wholesome, unadulterated, and correctly labeled and packaged.

The FSIS auditors were accompanied throughout the entire audit by government officials from the provincial and local CIQ offices. Determinations concerning program effectiveness focused on performance within the following six equivalence components upon which system equivalence is based: (1) Government Oversight (Organization & Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Points (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

Administrative functions were reviewed at the Shandong and Anhui Provincial CIQ offices and four local inspection offices. At these sites, the FSIS auditors evaluated the implementation of in-place management control systems that ensure that the national system of inspection, verification, and enforcement is being implemented as documented in the Self-Reporting Tool (SRT).

FSIS audited four establishments certified by the CCA to export processed (fully cooked not shelf stable) poultry products to the United States. Three of those establishments are located in Shandong Province, including two that process chicken products and one that processes duck products. The fourth establishment is located in Anhui Province and processes chicken products. At these establishments, the FSIS auditors assessed the extent to which industry and government interact to control hazards and prevent non-compliances that threaten food safety, with an emphasis on the CCA's ability to provide oversight through supervisory reviews conducted in accordance with Title 9 of the United States Code of Federal Regulations (9 CFR), section 381.196, the FSIS regulations addressing eligibility of foreign countries for importation of poultry products into the United States.

Additionally, two government microbiology laboratories, one located in Shandong Province and another located in Anhui Province, were audited to verify their ability to provide adequate technical support to the inspection system.

Scheduled Visits		#	Locations
Government Offices	Central	1	CCA/AQSIQ Headquarters Office, Beijing
	Provincial	2	Shandong Province CIQ Office, Qingdao Anhui Province CIQ Office, Hefei
Laboratories		2	Shandong Provincial CIQ Microbiology Laboratory, Qingdao Anhui Provincial CIQ Microbiology Laboratory, Hefei
Establishments • Poultry Processing		4	3700/03409- Processed Poultry (Chicken), Zhucheng, Shandong 3700/03435- Processed Poultry (Duck) Weifang, Shandong 3700/03447- Processed Poultry(Chicken) Qingdao, Shandong 3400/03045- Processed Poultry (Chicken) Chuzhou, Anhui

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

- The Poultry Products Inspection Act (21 United States Code (U.S.C.) 451 et seq.);
- The FSIS Regulations (9 CFR Part 381); and
- The FSIS Regulations for Imported Poultry (9 CFR Part 381, Subpart T).

The audit standards applied during the review of the PRC's processed poultry inspection system included all applicable legislation originally determined by FSIS as equivalent as part of the initial review process.

### III. BACKGROUND

The PRC is eligible to export to the United States processed poultry products that meet APHIS restrictions, that is, poultry products from the PRC may be imported if they are cooked throughout to reach a minimum internal temperature of 74 °C (165 °F) due to the fact that APHIS has determined that the PRC is affected by Exotic Newcastle disease and highly pathogenic avian influenza. In addition, raw poultry supplied to the processing establishments must be derived from FSIS-approved sources. Certified processed poultry establishments have not yet exported any products to the United States.

The FSIS final audit reports for the PRC's processed poultry inspection system are available on FSIS Web site at:

<http://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/importing-products/eligible-countries-products-foreign-establishments/foreign-audit-reports>.

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

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

The FSIS auditors verified that AQSIQ serves as the CCA that has legal authority to administer the poultry products inspection system for exports. The CCA ensures that processed poultry products for export are safe for human consumption and has promulgated regulations that are derived from national food safety laws. Two major bureaus of the CCA conduct registration and certification of import/export food producing establishments: the China Certification and Accreditation Administration (CNCA) and the Entry-Exit Food Safety Bureau. These agencies process applications for certification and work in coordination with CIQ bureaus to verify that establishments fulfill official requirements before receiving certification to export.

The CCA also maintains control of the movement of raw poultry into certified processing establishments. Only raw poultry from AQSIQ-approved establishments can be supplied to the certified processing establishments, in that manner, the CCA would only authorize production of processed poultry for export to the United States if the suppliers of raw materials were FSIS approved. Furthermore, imports of poultry products into the PRC are under the regulatory oversight of the CCA. Importation of ducks or duck products into the PRC is not permitted and chicken products are only imported from countries with poultry inspection systems that meet the CCA's standards and national laws. FSIS verified that CIQ officials ensure that both domestic and imported raw poultry products accepted by the certified establishments originate from certified sources. Correspondingly, the processing establishments' food safety programs include procedures and measures to assess the origin and sanitary status of incoming raw poultry products.

Documents reviewed by the FSIS auditors demonstrate that the CCA follows standardized procedures to ensure that products imported for further processing meet the PRC's food safety standards. Imported poultry products are obtained from establishments in countries that the CCA has evaluated and found eligible to export their products to the PRC. The FSIS auditors observed that current regulatory controls permit verification of origin of sourced raw poultry, i.e., sourced from certified establishments in eligible countries.

The FSIS auditors verified that the China National Accreditation Service for Conformity Assessment (CNAS), an agency of the CNCA, ensures that the laboratories of the system meet the requirements for laboratory quality systems and management in accordance with the International Standardization Organization (ISO) 17025 standard. The CNAS, as the accrediting authority, regularly conducts audits of the microbiology laboratories and prepares reports that identify non-conformances with the standard and document the adequacy of laboratory functions.

During this audit, the FSIS auditors verified the academic credentials of laboratory managers and analysts. The FSIS auditors verified that the laboratory personnel completed studies in the field of biology and participated in proficiency testing activities to expand the scope of their analytical proficiency. The analysts are qualified to conduct analysis of poultry products to detect pathogens of importance, including *Salmonella*, *Campylobacter*, and *Listeria monocytogenes* (*Lm*). Additionally, the laboratories have concluded the validation of the methods of analysis that will be used to verify the safety of processed poultry products once exports to the United States begins.

The CCA is using the two inspection manuals it has developed, namely Work Manual of Inspection, Quarantine and Supervision on Poultry Exported to the USA and the Monitoring Program for Microbes in Export Poultry Products, to provide uniform instructions to inspection personnel and establishments on United States food safety requirements. These manuals serve as the source of standardized instructions and regulatory guidance in the two provinces where the certified establishments are located. Accordingly, officials from Shandong and Anhui CIQ have been meeting to revise the manuals and train inspection personnel from both provinces on the new content. The CCA has continued training inspection personnel and further developing their skills to help them to qualify as establishment auditors.

The FSIS auditors reviewed documents and interviewed CIQ supervisors and in-plant officials and confirmed that they uniformly implement the regulatory standards, communicated by the CCA, at the certified processed poultry establishments. The FSIS auditors confirmed that supervisory and in-plant CIQ officials evaluate the establishments' compliance with HACCP regulatory requirements, sanitation programs, and control and prevention of microbial contamination for ready-to-eat (RTE) products.

The FSIS auditors reviewed records and observed the functions of CIQ personnel stationed at the certified establishments in both provinces and confirmed that the CCA maintains uniform implementation of verification and inspection activities in accordance with the regulatory instructions and guidance provided in the inspection manuals. Furthermore, a group of CIQ officials has been trained on methodology and techniques of evaluation of the establishments' food safety programs, in particularly on the fundamentals of HACCP and sanitation programs, verification of the adequacy of prevention, and control of microbiological hazards at the establishments producing RTE products. Supervisory officials assess the adequacy of implementation of verification activities and institute remedial measures to address identified shortcomings.

The FSIS auditors confirmed that CIQ supervisory personnel conduct and document periodic evaluations of employee performance. The FSIS auditors reviewed supervisory records and interviewed supervisors to assess the procedures used to evaluate employee performance. The FSIS auditors concluded that supervisors have the ability to assess inspectors' knowledge, skills, and ability to perform inspection activities.

The FSIS auditors concluded that the CCA has continued to adequately administer and develop its processed poultry inspection program. Government inspectors have also maintained competence to conduct inspection and verification activities under CCA supervision. The CCA provides instructions for the implementation of verification and inspection activities at certified establishments and supervises the performance of inspection personnel to ensure that they have the ability to enforce equivalent regulatory requirements at establishments certified to export processed poultry products to the United States.

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

The FSIS auditors reviewed the second of the six equivalence components of the PRC's Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (Inspection System Operation, Product Standards and Labeling, and Humane Handling). This component pertains to the legal authority and regulatory framework utilized by the CCA to impose requirements equivalent to those governing the system of processed poultry inspection organized and maintained in the United States. The system is to provide for controls over establishment construction, facilities, and equipment; daily inspection; and periodic supervisory visits to official establishments. There are no regulatory changes associated with the export of processed poultry products to the United States since the last audit that would have required changes in the regulatory controls administered by the CCA.

The CCA provides regulatory requirements for establishments certified to produce processed poultry products for export to the United States. The regulations of the PRC's poultry products inspection system require that establishments certified to export their products meet national food safety laws and meet the food safety requirements of importing countries. In accordance with that rule, establishments certified to export processed poultry products to the United States must be provided with daily inspection on each production shift; must meet requirements that apply to construction and maintenance of the facilities, sanitation programs, and HACCP systems; must maintain control over inedible and condemned materials; and must be subjected to periodic supervisory reviews.

The FSIS auditors interviewed supervisory and in-plant CIQ personnel to verify their knowledge of United States requirements, CCA regulations, and the contents of the revised inspection manuals issued by the CCA. The FSIS auditors also observed in-plant CIQ inspectors as they performed their assigned duties related to verifying the adequacy of the establishments' HACCP and operational sanitation programs.

The FSIS auditors concluded that supervisory and in-plant officials are knowledgeable of the food safety regulations of the PRC and their responsibilities as CIQ officials, and that they have the competency to enforce United States requirements.

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

The third of six equivalence components of the PRC's poultry products inspection system that the FSIS auditors reviewed was Government Sanitation. To be considered equivalent to the FSIS' program, the CCA is to provide general requirements for sanitation, sanitary handling of products, and development and implementation of sanitation standard operating procedures (SSOPs).

The FSIS auditors reviewed legislation, regulations, and official instructions issued by the CCA and confirmed that inspection officials exercise their legal authority to require establishments to develop, implement, and maintain sanitation programs to ensure sanitary handling of products and to prevent direct product contamination. The FSIS auditors found that the processing establishments implement strict controls to maintain sanitary conditions in the production areas, storage rooms, and surrounding areas. The establishments developed written SSOPs that they implement on a daily basis to ensure that the facilities are cleaned and sanitized prior to operations, and that production activities are conducted in a manner that prevents direct product contamination.

The FSIS auditors observed inspection officials conducting verification and inspection activities in order to monitor the adequacy of the establishments' sanitation programs. The auditors observed a consistent manner in which the inspectors at different stations prepared their equipment and inspection forms before beginning their daily evaluation of the establishments' sanitation programs. In addition, the FSIS auditors observed that the inspectors apply standards provided in the inspection manuals. In-plant officials inspect product contact surfaces and other environmental surfaces, rejecting equipment and production areas when found unacceptable, in a manner that is consistent with inspection practices observed in the United States.

Since all processing establishments in the system produce RTE products, the FSIS auditors evaluated the sanitation procedures that the establishments implement in the post-lethality areas where RTE products are exposed to the environment. The overall enforcement of sanitation requirements is acceptable. However, the FSIS auditors observed several isolated small areas in the production rooms of the establishments that in-plant inspectors and the establishments had failed to adequately assess prior to the audit. The identified non-compliances did not pose an immediate threat for contamination of products, since they mainly involved non-product contact surfaces. CIQ officials promptly instructed the establishments to correct the deficiencies and verified the adequacy of the implemented corrective actions.

The CCA has issued specific instructions to establishments and inspection personnel that prescribe controls and verification activities to prevent and control contamination of products at establishments that the CCA has certified to produce RTE poultry products for export to the United States. Documents reviewed and observations made demonstrate that the establishments maintain high sanitary standards in the RTE product handling rooms.

The sanitation programs require strict separation of production areas, personnel, equipment, and tools. Sampling of direct product contact surfaces and environmental surfaces to verify the adequacy of sanitation programs is standard practice at all processed poultry establishments.

The FSIS auditors verified that establishments and inspection personnel identify, document, and correct sanitation deficiencies noted during pre-operational and operational sanitation inspection. The observations of the facilities, sanitary controls, and operational activities revealed that the establishments' written sanitation programs are being implemented as described, the facilities are well maintained and in good repair, and sanitary controls are effectively implemented to prevent the development of insanitary conditions.

The CCA has issued regulatory requirements for certified establishments to develop sanitation programs that prevent the creation of insanitary conditions and direct product contamination.

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

The fourth of six equivalence components of the PRC's poultry products inspection system that the FSIS auditors reviewed was the Government HACCP System. The inspection system must require that each official establishment develop, implement, and maintain a HACCP program.

The FSIS auditors verified that the regulatory requirement issued by the CCA mandating each official establishment to develop, implement, and maintain a HACCP program remains in place. The FSIS auditors evaluated the design and implementation of HACCP programs at four certified poultry processing establishments and verified that inspection personnel exert their legal authority by requiring operators to comply with equivalent HACCP system rules.

The FSIS auditors verified the adequacy of the design and implementation of the HACCP programs in operation at the certified establishments. The regulatory controls maintained by the CCA require that processed poultry establishments control hazards at the point of receiving raw products and non-food materials. Additionally, establishments must control and prevent the occurrence of *Lm* and *Salmonella*, which are considered biological hazards reasonably likely to occur in the post-lethality processing environment. The CCA also requires that establishment hazard analyses address toxigenic spore-forming microorganisms during the cooling step of production processes that include heating.

The FSIS auditors reviewed documents and conducted on-site observations at the establishments to assess the adequacy of the design and implementation of the HACCP programs and the ability of CIQ inspectors to verify the adequacy of the food safety programs included in the establishments' HACCP systems. The FSIS auditors found that in-plant officials verify that certified establishments have included flowcharts showing all steps with corresponding written hazard analyses for each in their HACCP programs. Additionally, processing establishments have developed HACCP plans that include critical control points (CCP) for receiving of raw poultry and non-food materials; and for the temperature of products during the cooking and cooling steps.

The documents reviewed showed that inspection officials and establishments maintain records that adequately document the results of daily monitoring of HACCP plans. However, the FSIS auditors observed that the design of the written portions of the HACCP programs at two establishments contained flaws. At one establishment, the flow chart prepared for cooked poultry that was broiled and then steam cooked did not include the step where product that exits the broiler was assembled prior to entering the steam cooker. Consequently, that step had not been included in the hazard analysis. In addition, at two of the audited establishments, the FSIS auditors noted flaws in the written hazard analysis. At one of those establishments, bacterial pathogens, rather than the toxins produced by spore-forming toxigenic bacteria, were identified as the hazard to be controlled at the stabilization of cooked product step.

At another establishment, the documented hazard analysis conducted for the packaging step erroneously considers lowering temperature of product, as the method to control and prevent RTE product contamination by *Lm*, but the establishment actually uses its sanitation program for that purpose. Under the current conditions, the establishments where these flaws were identified maintain controls over the flow of the product that permit staging, cooking, and cooling of products in a relatively quick manner that minimizes the possibility of germination of spores of toxigenic bacteria. There are also strict sanitary controls in the post-lethality areas that are verified by regular sampling of surfaces in accordance with mandated equivalent regulatory controls. Throughout the processes, product temperature is monitored and recorded as part of the prerequisite programs maintained by the establishment. Therefore, even when there are flaws in the design of the written portions of the HACCP program, the actual processes take place under strict food safety controls that are verified by government officials.

The CCA also requires that the hazard analysis conducted by establishments recognize chemical residues as potential hazards. The records maintained by establishment personnel document monitoring and verification activities associated with the receiving of raw products and show that establishments maintain a CCP for receiving raw materials. Raw poultry received is accompanied by a government-issued certificate documenting that it was produced at an approved establishment. In-plant inspectors ensure that the establishments meet the CCA regulatory requirements for all certified processed poultry establishments to accept raw poultry only from CCA approved slaughter establishments.

The establishments promptly corrected the reported minor flaws noted in the design of the hazard analysis and flow charts of the HACCP programs and inspection officials verified the adequacy of the corrective actions, which the FSIS auditors also verified as acceptable.

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

The fifth of six equivalence components of the PRC's poultry products inspection system that the FSIS auditors reviewed was the Government Chemical Residue Testing Programs. The inspection system must have a chemical residue control program that is organized and administered by the national government, and that includes random sampling of internal organs, muscle, and fat of carcasses for detection of chemical residues that have been identified by the

exporting country's meat and poultry inspection authorities or by FSIS as potential contaminants, as well as methods to deter recurrence of chemical residue violations.

FSIS assesses the adequacy of the national residue control program within the scope of an audit being performed for slaughter inspection systems. Accordingly, the FSIS auditors concentrated only on the evaluation of the controls maintained by the CCA at the processing establishments. The evaluation demonstrated that the CCA enforces regulatory controls at the establishment level to ensure that raw poultry product used in the production processes is obtained only from CCA approved establishments that are under the national residue control program managed by the CCA. The FSIS auditors also interviewed CIQ supervisory and in-plant officials to verify that they have a good understanding of their roles as government authority representatives within the national residue control program and the responsibilities that they are to discharge once exports to the United States begin.

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

The sixth equivalence component of the PRC's poultry products inspection system that the FSIS auditors reviewed was the Government Microbiological Testing Programs. The system is to implement certain sampling and testing programs to ensure that poultry products produced for export to the United States are safe and wholesome.

Both the CCA and the establishments certified for export to the United States are to employ sanitary control measures to prevent adulteration of both post-lethality exposed and non-exposed RTE products by *Lm* and *Salmonella*. Furthermore, the CCA must conduct verification sampling and testing for *Lm* and *Salmonella* in post-lethality exposed RTE products, product contact surfaces, and environmental surface samples to verify that an establishment's control measures are effective in controlling these pathogens.

The CCA has developed a Microorganism Monitoring Program for Export Poultry Products manual that specifically describes the procedures and methodology to be used by inspection officials, laboratories, and establishments to prevent, control, and monitor the safety of RTE products in a manner equivalent to FSIS.

The CCA has also issued food safety regulations that specifically require establishments to recognize *Lm* and *Salmonella* as pathogens of concern to be prevented or controlled in the production processes for RTE products. The CCA requirement stipulates a zero tolerance for the presence of *Lm* and *Salmonella* in RTE cooked poultry products intended for export to the United States. The regulatory requirements also mandate that all certified processed poultry establishments implement controls for *Lm* in products and in the processing environment. The CCA further specifies the analytical method and sample size to be used by the laboratories conducting microbiological analysis of products for the identified pathogens.

The FSIS auditors interviewed CIQ officials at the provincial and local offices and the microbiology laboratories in the Shandong and Anhui Provinces to assess the protocols they follow to conduct official verification sampling to detect *Lm* and *Salmonella* in RTE products.

In addition, FSIS auditors assessed the procedures that are followed by in-plant personnel and laboratories to analyze samples collected from product contact surfaces and the environment at establishments certified to export RTE products to the United States. The officials demonstrated a sound knowledge of the instructions contained in the microbiological sampling manual and their responsibility to verify that establishments develop and implement verification sampling programs. The FSIS auditors confirmed that inspection officials also verify the adequacy of controls, and that official sampling of finished product for *Lm* occurs on a monthly basis.

All sampling protocols include test and hold measures. If a positive sample were found, either by government testing or by establishment testing, the CCA would initiate additional testing of food contact and environmental surfaces. Product that tests positive would not be eligible for export and would be under CIQ control, either to be destroyed or reprocessed. Subsequently, the CCA would require the establishment to initiate intensive cleaning and sanitizing of the environment and food contact surfaces. The CIQ officials would also conduct an in-depth verification assessment of the design and implementation of the food safety programs of the HACCP system and would sample product, product contact surfaces, and the post-lethality environment of the establishment that yielded positive test results.

Records reviewed by the FSIS auditors at the four certified establishments audited in the Shandong and Anhui provinces demonstrate that the establishments are adequately implementing sampling and testing programs to verify that *Lm* and *Salmonella* are controlled in the production processes of RTE products. Implementation of the microbiological control program has not yielded any positive results for the sampling conducted by either the establishment or the government for the detection of *Lm* and *Salmonella*.

The evaluation of this component included visits to the microbiology laboratories that serve the certified processed poultry establishments in Shandong and Anhui Provinces. At these laboratories, the FSIS auditors verified that managers and analysts have academic credentials in the field of biology and that analysts are evaluated and assigned responsibilities in accordance with their qualifications. The records reviewed by the FSIS auditors at the laboratories demonstrate that the laboratories maintain procedures to evaluate the status of received samples, maintaining their identity throughout the analysis process to the point of delivery of results. In addition, analysts receive training to improve their proficiency and participate in inter- and intra-laboratory proficiency testing that when successfully completed, lead to expansion of the scope of their accreditation.

The CNAS audits the laboratories yearly to verify their conformance with accrediting criteria that are aligned with ISO 17025 standards. Quality control managers from other CIQ microbiology laboratories also audit the laboratories and both groups document the results of their assessments in reports that are presented to laboratory managers.

A review of laboratory audit reports demonstrate that the conformance of the laboratories with CNAS standards is regularly assessed and corrective actions to address non-conformances are proffered, implemented and verified by laboratory managers, prior to a subsequent CNAS verification audit. The audited microbiology laboratories have developed analysts who

specialize in FSIS and equivalent PRC analytical methods that have been already validated to analyze processed poultry products.

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

An exit meeting with CCA officials was held on July 22, 2016, in Beijing, China. At this meeting, the FSIS auditors presented the preliminary findings from the audit that assessed the government offices, establishments, and laboratories that support the poultry products inspection system.

Minor deficiencies identified in the implementation of Government Sanitation and Government HACCP System component requirements were corrected immediately. The audit did not identify any significant findings that represented an immediate threat to public health from the products being manufactured.

## **Appendices**

Appendix A: Individual Foreign Establishment Audit Checklist

Appendix B: Foreign Country Response to Draft Final Audit Report (when available)

## Appendix A: Individual Foreign Establishment Audit Checklist

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION  Cargill Chuzhou, Anhui PRC	2. AUDIT DATE 07/18/2016	3. ESTABLISHMENT NO. 3400/03045	4. NAME OF COUNTRY The People's Republic of China
	5. NAME OF AUDITOR(S) International Audit Staff		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	O
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O	54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58. <i>Listeria monocytogenes</i> & <i>Salmonella</i> (RTE)	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

This is a ready-to-eat (RTE) poultry (chicken) product processing facility.

Sanitary controls are in place to prevent traffic, movement of materials and equipment, and personnel from raw product to RTE product processing and handling rooms. Inspection personnel verify the implementation of the sanitation program. The establishment monitors the sanitary conditions of the facilities on a daily basis, at established frequencies, prior and during operations. The sanitation program includes testing of surfaces in the post-lethality product handling area to verify adequacy of the sanitation program to control *Listeria monocytogenes*.

10. During pre-operational sanitation verification, FSIS observed that there were overhead structures located in the dry blending room that were not being adequately cleaned. Powdery residue accumulated on the surfaces of several structures in the room. Inspection officials indicated that the establishment had presented a cleaning program that designated those surfaces as due for cleaning on a monthly basis. However, the chosen frequency has been noted as inadequate and a more frequent cleaning of those surfaces will be conducted.

15. A review of documents included in the establishment’s HACCP program revealed several flaws in the written hazard analysis that do not undermine the food safety programs in effect. The establishment names *E. coli* O157:H7 as a recognized pathogen of interest at several steps of the process and in the post lethality environment. In addition, *Lm* and *Salmonella* are not recognized as the pathogens of interest in the post lethality environment and lowering the temperature of product is deemed as the control measure for pathogens known to occur in that environment. However, the cooked poultry product process follows procedures that include prevention and control of *Listeria monocytogenes* and *Salmonella* in the post-lethality environment. Furthermore, the establishment verifies the adequacy of its prevention and control measures by testing the product for the presence of the two pathogens of concern for RTE products. The microbiological analysis laboratory of the establishment has been audited by one of China’s accrediting bodies in accordance with ISO 17025 standard and has successfully remained accredited. In addition, the establishment indicated that the version of the documents being presented for review by the FSIS auditors had translation errors, typos and omissions.

Inspection officials took note of these findings and initiated actions to implement the pertinent corrective actions. FSIS auditors were provided a description of the corrective actions. The identified concerns were adequately resolved.

<p>61. NAME OF AUDITOR International Audit Staff</p>	<p>62. AUDITOR SIGNATURE AND DATE</p>
--	---------------------------------------

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION  Shandong Delicate Food Co. Ltd. Zhucheng, Shandong Province PRC	2. AUDIT DATE  07/15/2016	3. ESTABLISHMENT NO.  3700/03409	4. NAME OF COUNTRY  The People's Republic of China
	5. NAME OF AUDITOR(S)  International Audit Staff		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.

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

60. Observation of the Establishment

This is a ready-to-eat (RTE) poultry (chicken) product processing facility.

Sanitary controls are in place to prevent traffic, movement of materials and equipment, and personnel from raw product to RTE product processing and handling rooms. Inspection personnel verify the implementation of the sanitation program. The establishment monitors the sanitary conditions of the facilities on a daily basis, at established frequencies, prior and during operations. The sanitation program includes testing of surfaces in the post-lethality product handling area to verify adequacy of the sanitation program to control *Listeria monocytogenes*.

15. The step in the process where product exiting the broiler is placed on trays that are moved to an adjacent area where they are placed on racks that are subsequently moved into the steamer for cooking was omitted from the flow chart. Consequently, the hazard analysis for that step in the process was not conducted. Under the current rate of production, the establishment continuously places the trays of heat treated product in racks and moves them into the steamer, thus controlling the germination of spores of toxigenic bacteria by promptly cooking the heat treated product. However, in the absence of a hazard analysis that identifies the food safety hazards known to occur during that step, an increase in the flow of product could overwhelm current controls and compromise the safety of the products.

Inspection officials took note of this finding and initiated actions to implement the pertinent corrective actions. FSIS auditors were provided a description of the corrective actions. The identified concerns were adequately resolved.

61. NAME OF AUDITOR  
International Audit Staff

62. AUDITOR SIGNATURE AND DATE

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION  No. 2 Weifang Legang Food Co. Ltd. Weifang City, Shandong Province PRC	2. AUDIT DATE 07/14/2016	3. ESTABLISHMENT NO. 3700/03435	4. NAME OF COUNTRY The People's Republic of China
	5. NAME OF AUDITOR(S) International Audit Staff		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.

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

60. Observation of the Establishment

This is a ready-to-eat (RTE) poultry (duck) product processing facility.

10. Sanitary controls are in place to prevent traffic, movement of materials and equipment, and personnel from raw product to RTE product processing and handling rooms. Inspection personnel verify the implementation of the sanitation program. The establishment monitors the sanitary conditions of the facilities on a daily basis, at established frequencies, prior and during operations. The sanitation program includes testing of surfaces in the post-lethality product handling area to verify adequacy of the sanitation program to control *Listeria monocytogenes*. However, during the tour of the facilities FSIS observed flaking paint and corrosion on the top surfaces of two storage boxes placed along the wall in the post-lethality environment where cooked product is sliced and partitioned. These surfaces could not be easily cleaned and represented an insanitary condition in the post-lethality area. In addition, the upper part of door frames in several production areas, had started to deteriorate and some had accumulated organic residue on some sections of the frame. The floors in the production rooms require attention. There were several areas in the production rooms where patchy floor repairs and deteriorated floor surfaces with exposed concrete aggregate have created surfaces difficult to clean and sanitize.

15. The written hazard analysis prepared by the establishment identifies microbial growth as the hazard to be controlled during stabilization of heat treated product thus, omitting in the analysis the hazard that germination of toxigenic bacteria spores poses during the stabilization step. This noted flaw in the design of the hazard analysis has a limited impact on the actual control of the safety of the process, since the establishment follows procedures to monitor the temperature of the product to ensure adequate cooking and safe cooling contained in a pre-requisite program. Procedures also include testing product temperature at established times throughout the entire process from the cooking step to freezing and storing of the product.

Inspection officials took note of these findings and initiated actions to implement the pertinent corrective actions. FSIS auditors were provided a description of the corrective actions. The identified concerns were adequately resolved.

61. NAME OF AUDITOR  
International Audit Staff

62. AUDITOR SIGNATURE AND DATE

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Qingdao Nine Alliance Changguang Food Plant Qingdao city, Shandong Province PRC	2. AUDIT DATE 07/13/2016	3. ESTABLISHMENT NO. 3700/03447	4. NAME OF COUNTRY The People's Republic of China
	5. NAME OF AUDITOR(S) International Audit Staff		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	O
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	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	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O	54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58. <i>Listeria monocytogenes</i> & <i>Salmonella</i> (RTE)	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

This is a ready-to-eat (RTE) poultry product (chicken) processing facility.

10. The facilities are well maintained and in good repair. Sanitary controls are in place to prevent traffic, movement of materials, equipment and personnel from raw product to RTE product processing and handling rooms. Inspection personnel verify the implementation of the sanitation program. The establishment monitors the sanitary conditions of the facilities on a daily basis, at established frequencies, prior and during operations. The sanitation program includes testing of surfaces in the post-lethality product handling area to verify adequacy of the sanitation program to control *Listeria monocytogenes*. However, during the tour of the facilities FSIS observed that inside an overhead exhaust vent located above unprotected cooked product, there was a piece of unidentified grayish material of irregular shape, partly lodged in the grid of the vent. The material could become partly dislodged or fragmented and fall on the RTE product being handled below. In addition, beaded condensation was observed on a section of the ceiling in the packaged product handling, and organic residue resembling the color of the batter used in the processing of battered product had caked on the surfaces of an electrical cord outlet and on the surfaces of several overhead structures located at the entrance to the frying unit. Inspection officials took note of this finding and initiated actions to implement the pertinent corrective actions. FSIS auditors were provided a description of the corrective actions. The identified concerns were adequately resolved.

61. NAME OF AUDITOR  
International Audit Staff

62. AUDITOR SIGNATURE AND DATE

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

(Unofficial translation)

Subject: Reply to the draft report of the U.S. on the inspection of food safety management system of China's processed poultry

Dear Dr. Jane H. Doherty,

Thank you for providing the draft report regarding the inspection in July 2016 on the food safety management system of China's processed poultry. We appreciate the hard work as well as the comments and suggestions by your experts. Following an assessment, the Chinese side thinks that these comments and suggestions basically comply with the actual situation.

We are hoping that the U.S. side can follow through with its commitment in the China-U.S. 100-day plan on the importation of China-origin cooked poultry by completing the rule-making process as soon as possible, allowing for the realization of trade.

Sincerely yours,

Wang Dong  
Director  
Food Safety Division I  
Import and Export Food Safety Bureau  
AQSIQ

August 7, 2017

# 中华人民共和国国家质量监督检验检疫总局

GENERAL ADMINISTRATION OF QUALITY SUPERVISION, INSPECTION  
AND QUARANTINE OF THE PEOPLE'S REPUBLIC OF CHINA

## 关于提供对美国有关中国加工禽肉食品安全 管理体系考察报告草案评议意见的函

尊敬的 Jane H. Doherty 博士：

感谢您提供贵方 2016 年 7 月考察中国加工禽肉食品安全管理体系的报告草案。感谢贵方专家的辛勤工作以及提出的意见和建议。经评议，中方认为基本符合实际情况。

希望贵方兑现中美百日计划对进口中国自产熟制禽肉的承诺，尽快完成立法程序，以早日实现贸易。

顺致敬意！

中华人民共和国国家质量监督检验检疫总局

进出口食品安全局 食品安全一处处长



2017 年 8 月 7 日