United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

JUL - 9 2004

Dr. Piotr Kolodziej
Chief Veterinary Officer
Veterinary Inspection
General Veterinary Inspectorate
Republic of Poland
30 Wspolna Street
00-930 Warsaw, Poland

Dear Dr. Kolodziej:

The Food Safety and Inspection Service completed an on-site audit of Poland's meat inspection system. The audit was conducted from November 19 through December 16, 2003. The comments from Poland have been included in the final report. Enclosed is a copy of the final report.

If you have any questions regarding the audit or need additional information, please contact me by telephone at 202-720-3781, by fax at 202-690-4040, or by e-mail at sally.white@fsis.usda.gov.

Sincerely,

Sally White JD

Sally White, Director
International Equivalence Staff
Office of International Affairs

Enclosure

EQUAL OPPORTUNITY IN EMPLOYMENT AND SERVICES

cc:
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Andrzej Gdula, Economic Counselor, Embassy of Poland
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Country File

FINAL

JUN 14 2004

FINAL REPORT OF AN AUDIT CARRIED OUT IN POLAND COVERING POLAND'S MEAT INSPECTION SYSTEM

NOVEMBER 19 THROUGH DECEMBER 16, 2003

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority [General Veterinary Inspectorate]
MARD	Minister of Agriculture and Rural Development
CVO	Chief Veterinary Officer
DCVO	Deputy Chief Veterinary Officer
HFA	Hygiene of Foodstuffs of Animal
PVI	Provincial Veterinary Inspectorate
PVO	Provincial Veterinary Officer
DVI	District Veterinary Inspectorate
DVO	District Veterinary Officer
VI	Veterinary Inspector
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
SSOP	Sanitation Standard Operating Procedures
E. coli	*Escherichia coli*
Salmonella	*Salmonella* species

1. INTRODUCTION

The audit took place in Poland from November 19 through December 16, 2003.

An opening meeting was held on November 19, 2003, in Warsaw with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Poland's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the General Veterinary Inspectorate, and/or representatives from the regional and district inspection offices.

2. OBJECTIVE OF THE AUDIT

This audit was a routine audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter and processing establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, one provincial inspection office, one district office, two laboratories performing analytical testing on United States-destined product, six swine/bovine slaughter and processing establishments, three swine slaughter and processing establishments and one meat processing establishment.

Competent Authority Visits			Comments
Competent Authority	Central	1	
	Provincial Veterinary Office	1	
	District Veterinary Office	1	
Laboratories		2	
Meat Slaughter and Processing Establishments		9	
Meat Processing Establishment		1	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters or regional offices. The third part involved on-site visits to 10 establishments: nine slaughter and processing establishments and one processing establishment. The fourth part involved visits to two government laboratories. The Regional Veterinary Hygiene Laboratory-Microbiology, Warsaw, was conducting analyses of field samples for the presence of

Salmonella. The National Veterinary Research Institute, Pulawy, was conducting analyses of field samples for Poland's national residue control program.

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

During all on-site establishment visits, the auditor evaluated the nature, extent and degree to which findings impacted on food safety and public health. The auditor also assessed how inspection services are carried out by Poland and determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

At the opening meeting, the auditor explained that Poland's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Poland. FSIS requirements include, among other things, daily inspection in all certified establishments, monthly supervisory visits to certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella*.

Equivalence determinations are those that have been made by FSIS for Poland under provisions of the Sanitary/Phytosanitary Agreement. No equivalence determinations have been made for Poland.

4. LEGAL BASIS FOR THE AUDIT

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

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at www.fsis.usda.gov/oppde/far/index.htm

The following findings were reported in the August 2002 FSIS audit:

- In one establishment, the side skinner pusher bar was contaminated and was touching exposed tissue of the carcass back.
- In one establishment, in the spice and dry material storage area, several spice bags were open, creating the potential for rodent infestation and cross contamination.
- In one establishment, the effectiveness of SSOP was not recorded and no preventive actions were recorded in the daily pre-operational sanitation-monitoring sheet.
- Sanitation controls were lacking regarding walls in the production area.
- In one establishment, bruises were observed on finished carcasses in the final cooler and hairs were observed on a few carcasses in the ham area.
- Insufficient lighting was present in certain non-production areas in the above-mentioned establishment.
- The dates and time and references for monitoring for critical control points were not properly identified in the written HACCP plan.
- In one establishment, reassessment of HACCP was not conducted annually and no records were found.
- In the same establishment, monitoring records of CCPs were documented but were not referred in the HACCP plan and the time of recording was not mentioned.

There was no FSIS audit in fiscal year 2003.

6. MAIN FINDINGS

6.1 Government Oversight

The Polish meat inspection system is organized in three levels. The first level is the Minister of Agriculture and Rural Development (MARD), which includes the General Veterinary Inspectorate. This is the level of government that FSIS holds responsible for ensuring that FSIS requirements are implemented and enforced. The second level is the Provincial Veterinary Inspectorate (PVI). There are16 provinces (each province has between 15 to 32 districts). Each province is independent from the MARD. The third level is the District Veterinary Inspectorate (DVI). The District is responsible for all veterinary related activities including meat inspection and monthly audits at each certified U.S. establishments. The district monthly audit report is kept in the archives of the veterinarian in-charge, district and provincial offices. The CCA officials neither participate in monthly reviews nor receive a copy of monthly audit report from PVI or DVI. The CCA relies upon the results of province and district audits of its inspection system.

The District has total authority for all human resource activity. The Province may approve or disapprove a meat establishment based on district recommendation. The Province notifies the CCA regarding approval or disapproval of U.S. certified establishments. The CCA only keeps the list of the U.S. approved establishments. There has not been any official audit (on-site or reviewing the monthly district audit report) of these establishments by the CCA to verify compliance with U.S. requirements.

6.1.1 CCA Control Systems

The PVI office in Siedlce and the DVI office in Sokolow Podlaski were visited. During this audit, the auditor discovered that listing and delisting of the U.S. approved establishments is

being done by the DVI and PVI offices. All inspection veterinarians and inspectors in establishments certified by Poland as eligible to export meat products to the United States were full-time and part-time employees of the Department of Food Safety and Veterinary of the Ministry of Agriculture and Rural Development (DFSV).

6.1.2 Ultimate Control and Supervision

The CCA had insufficient authority to supervise the meat inspection related activities in the provincial offices. Provincial offices have the authority to supervise the activities of the District offices and the District offices have the authority to supervise the activities of the Veterinarian Inspectors. FSIS regulatory requirements are normally distributed via a CCA Intranet to the provinces and districts. One circular was sent from CCA regarding *E. coli* and *Salmonella* testing requirements to all PVI, DVI, and U.S. certified establishments. Generally, FSIS regulatory requirements are not translated into the Polish language.

Polish meat inspection officials had no standard procedures for verifying FSIS requirements in the certified establishments. Supervisory monthly checklists did not adequately address PR/HACCP requirements.

6.1.3 Assignment of Competent, Qualified Inspectors

All establishments were staffed with full time and/or part time veterinarians and non-veterinary inspectors. Continuous daily inspection was provided for all certified slaughter and processing establishments. Although staffing appeared to be adequate in individual establishments, problems were identified in enforcing FSIS regulatory requirements in all 10 establishments.

There were insufficient formal training programs for meat inspection personnel in the certified establishments.

6.1.4 Authority and Responsibility to Enforce the Laws

Four of 10 establishments were delisted (three establishments for SSOP and HACCP non-compliances and one establishment for SSOP, HACCP, and inhumane slaughter non-compliances). Six establishments received a Notice of Intent to Delist (NOID) for inadequate implementation of HACCP.

The CCA did not have ultimate control over the supervision of government inspectors.

6.1.5 Adequate Administrative and Technical Support

The CCA did not have adequate Administrative and Technical Support to implement U.S. requirements such as translation of FSIS rules and directives.

The CCA did not have adequate ability to support a third-party audit.

6.2 Headquarters Audit

The auditor conducted a review of inspection system documents at Headquarters, Provincial, and District offices. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the United States.
- Training records for inspectors and laboratory personnel.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Export product inspection and control, including export certificates.
- Enforcement records, including examples of withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

No concerns arose as a result the examination of these documents.

6.3.1 Audit of Regional and Local Inspection Sites

One PVI office in Siedlce and one DVI office in Sokolow Podlaski were visited. Both of the offices were in Warsaw province.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 10 establishments: nine slaughter/processing establishments and one processing establishment. Four establishments were delisted by Poland. Three establishments were delisted by Polish government officials due to non-compliance with implementation of SSOP, HACCP, and lack of enforcement requirements. One establishment was delisted due to non-compliance with implementation of SSOP, HACCP, humane handling and slaughter, and lack of enforcement requirements by Polish government officials. Six establishments received an NOID from Poland due to inadequate implementation requirements for HACCP.

These establishments may retain their certification for export to the United States provided that they correct all deficiencies noted during the audit within 30 days of the date the establishment was reviewed.

Specific deficiencies are noted in the attached individual establishment review forms.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis was placed on the application of procedures and standards that are equivalent to United States requirements.

Residue laboratory audits focus on sample handling, sampling frequency, timely analysis data reporting, analytical methodologies, tissue matrices, equipment operation and printouts,

detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test United States samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements.

The following laboratories were reviewed:

The National Veterinary Research Institute, Pulawy, and Regional Veterinary Hygiene Laboratory-Microbiology, Warsaw, were reviewed. These were both central government laboratories.

No deficiencies were noted.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focused on five areas of risk to assess Poland's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of establishments, and except as noted below, Poland's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

In addition, and except as noted below, Poland's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States domestic inspection program. The SSOP in the 10 establishments were found to meet the basic FSIS regulatory requirements, with the following deficiencies.

Polish government officials took corrective actions in the case of direct product contamination in some establishments. Completed Foreign Establishment Audit Checklists for all audited establishments are attached.

- In one establishment, Polish government meat inspection officials did not maintain official records for daily pre-operational sanitation.

- In five of 10 establishments, Polish government officials were not routinely evaluating the adequacy and effectiveness of the SSOP to prevent direct product contamination. There were no records of any deficiencies concerning SSOP for the last two months.

- In five establishments, dried pieces of product residues and grease from the previous day's operation were observed on the product contact surfaces of the following equipment: several smoke sticks, meat scrapper, racks, brine injection machine, ham tenderizer, plastic conveyor belt with broken and loose paddles and numerous metal containers with open gaps and rough cracked edges. Dirt and a heavy accumulation of dark residue were observed inside the stainless steel smoke house's ducts. This smoke house was being used to wash and sanitize racks for edible product. Dirty water was dripping onto racks from smoke house ceilings and overhead ducts resulting in cross contamination of racks. Accumulations of fat and dark discolored residues were observed inside of the automatic washing/sanitizing viscera cabinet during the operation in the swine slaughter room.

- In two establishments, dripping condensate from overhead pipes and rails that were not cleaned/sanitized daily was falling onto carcasses and exposed edible product in the corridor between coolers, boning, and processing rooms. In another establishment, dripping condensate from ceilings that were not cleaned/sanitized daily was falling onto containers for edible product after washing in the storage room. Polish government officials took corrective actions.

- In five establishments, contaminated and suspect swine carcasses were diverted to a congested retain rail for disposition resulting in direct product contamination. Carcasses were in direct contact with other suspect or contaminated carcasses with visible fecal contamination and/or hair. Numerous swine carcasses with fecal contamination around the anus area were observed at the carcass bung dropping station. These contaminated carcasses were not trimmed prior to splitting into halves resulting in the spread of contamination into pelvic cavity and dorsal section of the carcasses. Swine carcasses with excessive hair were shaved after evisceration at the carcass retain rail. Neck and jowls of hog carcasses were contacting employees' work platform and employees' boots in the boning room. Meat product was contacting rusty overhead frame of equipment in the caning room. Hog carcasses were contacting employees' boots and work platform at the carcass trimming station in the slaughter room. Unidentified black specks were found inside of ready-to-eat packaged smoked and cooked pork tenderloins in the packaging room.

- In five establishments, the written SSOPs did not adequately document the implementation, monitoring, and corrective actions taken including preventive measures.

9.2 Sanitation

- In two establishments, overhead supports had rust in several locations over exposed products in the boning room. Flaking paint, rust, and a build up of black

discoloration was observed on the air intake covers and on the edges of the fan blades located above the exposed products in the cutting room and over a meat grinder in the processing room. These deficiencies had been identified by the establishment personnel (protocol and work order dated October 15, 2003) but no corrective actions were taken as of December 4, 2003 by either establishment officials or Polish government meat inspection officials. No product contamination was observed.

- In one establishment, beaded condensation was observed on overhead structures over exposed product in the boning and processing rooms. No product contamination was observed.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, humane handling and humane slaughter, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Poland's inspection system had adequate controls in place. No deficiencies were noted.

The Animal, Plant and Health Inspection Service (APHIS) animal disease restrictions are in place for Bovine Spongiform Encephalopathy (BSE), Foot and Mouth Disease (FMD), Hog Cholera, and Swine Vesicular Disease.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures; ante-mortem disposition; post-mortem inspection procedures; post-mortem disposition; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments and implementation of a generic *E. coli* testing program in slaughter establishments.

11.1 Humane Handling and Slaughter

In one establishment, several hogs were not stunned effectively prior to being shackled, hoisted, thrown, cast, or cut causing inhumane handling and slaughter. Corrective actions were taken following FSIS auditors observation. Corrective actions were not adequate to comply with 9 CFR 313 humane slaughter regulatory requirements.

11.2 HACCP Implementation.

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. Each of these programs

was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of the 10 establishments. All 10 establishments had not adequately implemented the HACCP requirements.

- In five establishments, the HACCP plan did not address chemical, physical, and biological hazards at each step of their hazard analysis.

- In two establishments, the packaging materials, spices, and other non-meat food ingredients were not addressed in their hazard analysis including the flow chart.

- In three establishments, the written HACCP plan did not have adequate decision making documents associated with the selection of Critical Control Points (CCPs), critical limits, and the frequency of monitoring and verification procedures. The hazard analysis did not include food safety hazards (fecal material and ingesta) that are reasonably likely to occur in the production process.

- In four establishments, the critical limits, monitoring procedures and the monitoring frequency performed for each CCP were not adequately addressed in the written HACCP plan.

- In eight establishments, the CCP monitoring procedures and frequencies as written in the HACCP plan were not followed. For example, the zero tolerance for fecal material was not performed at the designated location in the slaughter room. One temperature reading was taken in the carcass cooler instead of four temperature recordings as written in the HACCP plan.

- In seven establishments, on-going verification procedures such as calibration of process-monitoring instruments, direct observations of monitoring activities, and the frequency with which those procedures will be performed, were not listed in HACCP plan.

- In 10 establishments, on-going verification of direct observation of monitoring activities, corrective actions, and the calibration of process-monitoring instruments was not adequately performed. For instance, the verification procedures as written in the HACCP plan for CCPs (zero tolerance for fecal and ingesta) were not performed at the designated location in the slaughter room.

- In two establishments, pre-shipment document reviews were not adequately performed.

- In nine establishments, all four parts of the corrective actions to be followed when a deviation occurs were not adequately addressed in the written HACCP plan. For example, based on the written HACCP plan, corrective actions for fecal zero tolerance had a two percent action limit. There were no records that: (1) the cause of the deviation was eliminated; (2) the CCP was brought under control after corrective

action was taken; (3) measures to prevent recurrence were established; and (4) no product that was adulterated as a result of the deviation entered commerce.

- In eight establishments, appropriate corrective actions and preventive measures were not taken when a CCP (fecal zero tolerance) deviation from a critical limit occurred in slaughter room. For example, carcasses with fecal contamination passed the critical control points and several beef carcasses were observed with fecal materials, hair, and dirt in the coolers and boning rooms. Carcass temperature deviations occurred in the cooler.

- In all 10 establishments, records documenting the monitoring of CCPs and verification did not include the actual values, critical limits, time, and initials or a signature. For example, there were no records for all five temperature readings taken in the cooler as written in the establishment HACCP plan; only the maximum temperature was recorded. Monitoring temperatures were being recorded as an average.

11.3 Testing for Generic *E. coli*

Poland has adopted the FSIS regulatory requirements for generic *E. coli* testing.

Nine of the 10 establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in all nine of the slaughter establishments.

11.4 Testing for *Listeria monocytogenes*

Nine of the 10 establishments audited were producing ready-to-eat products for export to the United States. In accordance with United States requirements, the HACCP plans in these establishments had been reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to occur.

Poland has a program of testing *Listeria monocytogenes* in ready-to-eat products if exported to the United States.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

The National Veterinary Institute of the Central Government in Pulawy was reviewed.

No deficiencies were noted.

Poland's National Residue Testing Plan for 2003 was being followed as scheduled.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella*.

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments.

13.2 Testing for *Salmonella*

Poland has adopted the FSIS regulatory requirements for testing for *Salmonella*.

Nine of the 10 establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* was properly conducted in all nine establishments.

13.3 Species Verification

Species verification was being conducted in those establishments in which it was required.

13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required.

- In one of 10 establishments, supervisory reviews of the certified establishment were not being performed monthly (four reviews per year).
- In all 10 establishments audited, supervisory monthly audit records indicated inadequate government enforcement.

13.5 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between establishments; and prevention of commingling of product intended for export to the United States with product intended for the domestic market.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other counties for further processing.

Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

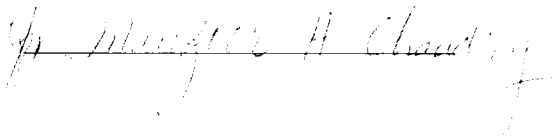
- In one establishment, one receptacle for inedible product was being used for storing edible product in the processing room. Establishment officials took corrective action.

14. CLOSING MEETING

A closing meeting was held on December 16, 2003, in Warsaw with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. Faizur R. Choudry
International Audit Staff Officer



15. ATTACHMENTS

Individual Foreign Establishment Audit Forms
Individual Foreign Laboratory Audit Forms
Foreign Country Response to Draft Final Audit Report

[illegible] 11 20 03 The National Veterinary Institute

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
General Veterinary Inspectorate	Pulaway, Poland	Pulawy, Poland

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr.F. Choudry & Dr. N. Memariam	Dr. Pawel Piotrowski, Veterinary Inspector

	Residue Code/Name ▶			100	111	300	400	500	200	203	923				
	REVIEW ITEMS	ITEM #													
SAMPLING PROCEDURES	Sample Handling	01	EVALUATION CODE	A	A	A	A	A	A	A	A				
	Sampling Frequency	02		A	A	A	A	A	A	A	A				
	Timely Analyses	03		A	A	A	A	A	A	A	A				
	Compositing Procedure	04		O	O	O	O	O	O	O	O				
	Interpret Comp Data	05		O	O	O	O	O	O	O	O				
	Data Reporting	06		A	A	A	A	A	A	A	A				
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A	A	A	A	A	A	A				
	Correct Tissue(s)	08		A	A	A	A	A	A	A	A				
	Equipment Operation	09		A	A	A	A	A	A	A	A				
	Instrument Printouts	10		A	A	A	A	A	O	A	A				
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	A	A	A	A	A	O	A	A				
	Recovery Frequency	12		A	A	A	A	A	O	A	A				
	Percent Recovery	13		A	A	A	A	A	O	A	A				
	Check Sample Frequency	14		A	A	A	A	A	A	A	A				
	All analyst w/Check Samples	15		A	A	A	A	A	A	A	A				
	Corrective Actions	16		A	A	A	A	A	A	A	A				
	International Check Samples	17		A	A	A	A	A	A	A	A				
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE	A	A	A	A	A	A	A	A				
OTHER REVIEW		19	EVAL. CODE												
		20													

SIGNATURE OF REVIEWER [signature] DATE 1/06/04

FSIS FORM 9520-4 (9/96) Designed on FormFlow Software

FOREIGN COUNTRY LABORATORY REVIEW

Comment Sheet

11 21 03 The National Veterinary Institute

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
General Veterinary Inspectorate	Pulaway, Poland	Pulawy, Poland

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr.F. Choudry & Dr. N. Memariam	Dr. Pawel Piotrowski, Veterinary Inspector

RESIDUE	ITEM NO.	COMMENTS

12/09/03 Regional Veterinary Hygiene Laboratory

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
General Veterinary inspectorate	Warsaw, Poland	21, Lechikona Street, 02-156, Warsaw

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr.F.Choudry & Dr.N.Memarian	Dr. Pawel Piotrowski, Veterinary Inspector

	Residue Code/Name			Sal
	REVIEW ITEMS	ITEM #		
SAMPLING PROCEDURES	Sample Handling	01	EVALUATION CODE	A
	Sampling Frequency	02		A
	Timely Analyses	03		A
	Compositing Procedure	04		O
	Interpret Comp Data	05		O
	Data Reporting	06		A
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A
	Correct Tissue(s)	08		A
	Equipment Operation	09		A
	Instrument Printouts	10		A
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	O
	Recovery Frequency	12		O
	Percent Recovery	13		O
	Check Sample Frequency	14		A
	All analyst w/Check Samples	15		A
	Corrective Actions	16		A
	International Check Samples	17		A
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE	A
OTHER REVIEW		19	EVAL. CODE	
		20		

SIGNATURE OF REVIEWER: [signature] DATE: 1/06/04

FSIS FORM 9520-4 (9/96) Designed on FormFlow Software

FOREIGN COUNTRY LABORATORY REVIEW

Comment Sheet

REVIEW DATE	FOREIGN LABORATORY
12/09/03	Regional Veterinary Hygiene Laboratory

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
General Veterinary inspectorate	Warsaw, Poland	21, Lechikona Street, 02-156. Warsaw

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr.F.Choudry & Dr.N.Memarian	Dr. Pawel Piotrowski, Veterinary Inspector

RESIDUE	ITEM NO.	COMMENTS

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Zaklady Miesne, Sokolow S.A. 08-300 Sokolow Podlaski Al. 550-Lecia 1	12/08/03	268	Poland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. F. Choudry & Dr. N. Memarian		X ON-SITE AUDIT ☐ 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	X
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58. Notice of Intent to Delist	X
59.	

Est. 268 Date of audit: 12/08/2003 Slaughter & Processing Operations

15/51. a) The establishment did not address chemical, physical, and biological hazards at each step of their hazard analysis. The packaging materials, spices, and other non-meat food ingredients were not addressed either in the flow chart or in their hazard analysis. 9 CFR 417.2(a)(1)(2) regulatory requirements were not met.
b) Ongoing verification procedures such as calibration of process-monitoring instruments, direct observations of monitoring activities, and the frequency with which those procedures will be performed were not listed in HACCP plan. 9 CFR 417.4(a)(2)(i)(ii) regulatory requirements were not met.

18/51. Monitoring procedures for CCP2 were not performed as prescribed frequency written in HACCP plan. FSIS 9 CFR 9 CFR 417.2 (c)(4) regulatory requirements were not met.

19/51 Plant verification procedures written in HACCP plan for CCP2 (zero tolerance for fecal material & ingesta) were not performed at the designated location in the slaughter room. 9 CFR 417.2(c)(7) regulatory requirements were not met.

22/51 a) The establishment did not review all the records associated with the production of product designated to ship to the U.S. on its pre-shipment document.
b) There was no actual value, time, and initial for each entry on HACCP records.
9 CFR 417.5(a)(3), (b), (c) regulatory requirements were not met.

51. There was no documentation in the inspection files that Government of Poland (GOP) meat inspection officials were adequately complying with 9 CFR 417.8 (a)(b)(c)(d)(h) regulatory requirements.

57/51 There was no indication of any findings in the supervisory monthly records concerning aforementioned HACCP noncompliances. 9 CFR 417.8 regulatory requirements were not met.

58. GOP meat inspection officials gave a Notice of Intent to Delist (NOID) to Establishment 268 regarding the inadequate implementation requirements for HACCP. Polish Veterinary Inspection official is to evaluate the adequacy of corrective actions and provide a full report to FSIS.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. F. Choudry & Dr. N. Memarian	12-23-03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Zaklady Miesne Pozmeat S.A W. Robakowie G.M. Kornik	12/04/03	30210224	Poland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. F. Choudry & Dr. N. Memarian		X ON-SITE AUDIT ___ 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	X
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	X
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58. Unacceptable	X
59.	

FSIS- 5000-6 (04/04/2002)

60. Observation of the Establishment:

Est. 30210224 Date of audit: 12/04/2003 Slaughter and Processing Operations

11/51 Establishment officials were not routinely evaluated the adequacy and effectiveness of the Sanitation SOP's to prevent direct product contamination. There were no records of any deficiencies concerning SSOPs for the last two months. 9 CFR 416.14 regulatory requirements were not met.

12/51 a) Numerous swine carcasses with fecal contamination around anus area were observed at the carcass bung dropping station. Contaminated carcasses were not trimmed prior to splitting into halves resulting spread of contamination into pelvic cavity and dorsal section of the carcasses.
b) Swine carcasses with excessive hair were shaved after evisceration at the carcass retain rail.
c) A plastic conveyor belt for edible product had product residues in its broken and loose paddles from previous day's operation in the processing room.
d) Carcasses with visible fecal contamination and hair were in direct contact with other suspected or contaminated carcasses at a congested retain rail.
9 CFR 416.15 regulatory requirements were not met.

13/51 Establishment did not adequately document the implementation, monitoring, and any corrective actions taken including preventive measures in its SSOP records. 9 CFR 416.16 (a) regulatory requirements were not met.

15/51 (a) Calibration of process monitoring instruments and direct observations of monitoring activities and the frequency with which those procedures will be performed are not listed in the HACCP plan. 9 CFR 417.2 (c)(7) regulatory requirements was not met.
(b) The written HACCP plan did not adequately identify the corrective action to be followed in response to a deviation from a critical limit. FSIS 9 CFR 417.3 (a) (1)(2)(3)(4) regulatory requirements were not adequately met.

18/51 Monitoring procedures for CCP1 (zero tolerance for fecal material) were not performed at the designated location in the slaughter room. 9 CFR 417.2 regulatory requirements were not met.

19/51 a) Verification procedures were not performed at the designated CCP location (bung dropping station).
b) Ongoing verification of direct observation of monitoring activities, corrective actions, and reviews of records did not comply with 9 CFR 417.4(a)(2) regulatory requirements were not met.

20/51 There was no corrective actions in response to a deviation from a critical limit at the CCP1. Carcasses with fecal contamination passed the critical control point at the bung dropping station. Corrective actions written in the establishment HACCP plan did not comply with 9 CFR 417.3(a)(1) (2) (3)(4) regulatory requirements.

22/51 a) The monitoring records for carcass temperature (CCP2) did not document all five temperature readings taken in the cooler as written in the establishment HACCP plan. Only the maximum temperature was recorded.
b) Preventive measures were not included in the HACCP records.
c) The establishment did not perform pre-shipment document reviews.
d) There was no actual value, time, and initial for each entry on the HACCP calibration records.
9 CFR 417.5(a)(3), (b), (c) regulatory requirements were not met.

39/51 Flaking paint, rust, and build up of black color residue was observed on the air intake covers and on edges of the fan blades located above the exposed products (no product contamination was observed) in the cutting room and over a meat grinder in the processing room. These deficiencies had been identified by the establishment personnel (protocol and work order dated October 15, 2003) but no corrective actions were taken as of December 4, 2003 by either the establishment or the Polish Veterinary Inspection. 9 CFR 416.2(a) regulatory requirements were not met.

41/51 Beaded condensation was observed on overhead structures over exposed products (no product contamination was observed) in the boning and processing rooms. 9 CFR 416.2(d) regulatory requirements were not met.

51 There was no documentation in the inspection files that Polish meat inspection officials were adequately complying with 9 CFR 417.8 (a) (c) (d) (f) (h) regulatory requirements.

57/51 There was no indication of any findings in the supervisory monthly records concerning aforementioned HACCP and SSOPs noncompliances. 9 CFR 417.8 regulatory requirements were not met.

58 Due to noncompliance with implementation of SSOPs, HACCP, and lack of regulatory enforcement by the Government of Poland (GOP) meat inspection officials, the status of this establishment is not equivalent to that required in the U.S. program. All the above deficiencies were discussed with GOP officials and they agreed to remove Establishment 30210224 from the list of establishments eligible to export meat and meat products to the United States, effective December 4, 2003.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. F.Choudry & Dr. N. Memarian	12-23-03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Zaklady Miesne W Kole Lulow Ul. Przemyslowa	11/21/03	66	Poland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. F. Choudry & Dr. N. Memarian		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	X
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58. Notice of Intent to Delist	X
59.	

Est. 66 Audit date 11/21/03 Slaughter and Processing Operations

13. Government of Poland (GOP) meat inspection officials did not maintain official records for pre-operational sanitation. 9 CFR 416.17 regulatory requirements were not met.

15/51. The establishment did not address chemical, physical, and biological hazards at each step of its hazard analysis. The procedures and frequency for monitoring were not adequately addressed in the written HACCP plan. Ongoing verification activities, calibration of process-monitoring instruments, direct observations of monitoring activities, corrective actions, and review of records were not adequately addressed in the written HACCP plan. The maximum or minimum values of critical limits at each of the critical control points were not identified. All four parts of the corrective actions and preventive measures to be followed when a deviation occurs were not adequately addressed in the written HACCP plan. 9 CFR 417.2(a)(1), 417.2 (c)(4), 417.4(a)(2), 417.2(c)(3), and 417.3(a) regulatory requirement were not adequately met.

18/51. Monitoring procedures written in the HACCP plan to monitor critical control points were not followed. One temperature was taken in the carcass cooler instead of four temperatures as written in the HACCP plan. 9 CFR 417.2(c)(4) regulatory requirements were not adequately met.

19/51. Plant ongoing verification of direct observation of monitoring activities, corrective actions and the calibration of process-monitoring instruments did not meet 9 CFR 417.4(a)(2) regulatory requirements.

20/51. Corrective actions in response to a deviation from a critical limit (fecal zero tolerance and product temperature) were not taken as required by 9CFR 417.3(a).

22/51. Entries on HACCP records for monitoring, corrective actions, and plant verification activities, did not include critical limits, times, initial or signature, and actual values for each occurrence. Monitoring temperatures were being recorded as an average. 9 CFR 417.5 (a)(3) and 417.5(b) regulatory requirements were not adequately met.

51. There was no documentation in the inspection file that GOP meat inspection officials were adequately complying with HACCP regulatory requirements as required by 9 CFR 417.8 (a)(c)(d)(f)(h).

57/51. Monthly supervisory audits were not conducted monthly (four times per year). There was no indication of any findings in the supervisory monthly records concerning aforementioned HACCP noncompliaces. 9 CFR 417.8 regulatory requirements were not met.

58. GOP meat inspection officials gave a Notice of Intent to Delist (NOID) to Establishment 66 regarding inadequate implementation requirements for HACCP. Polish Veterinary Inspection official is to evaluate the adequacy of corrective actions and provide a full report to FSIS.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. F. Choudry & Dr. N. Memarian	12-23-03

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO	4. NAME OF COUNTRY
Zaklady Miesne W Kole S.A. Kolo Ul. Torunska 242	12/02/03	67	Poland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. F. Choudry & Dr. N. Memarian		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	X
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	X
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	X
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58. Unacceptable	X
59.	

Est. 67 Audit Date 12/02/03 Slaughter & Processing Operations

11/51. Establishment officials were not routinely evaluated the adequacy and effectiveness of the Sanitation SOP's to prevent direct product contamination. There were no records of any deficiencies concerning SSOPs for the last two months. 9 CFR 416.14 regulatory requirements were not met.

12/51. a) Product residues from previous day's operation were observed on ham tenderizer in the processing room.
b) A plastic conveyor belt for edible product had product residues in its broken and loose paddles from previous day's operation in the processing room.
c) Meat product was contacting rusty overhead frame of equipment in the caning room.
d) Hog carcasses were contacting employee's boots and work platform at the carcass trimming station in the slaughter room.
e) Unidentified black specks were found inside of ready-to-eat packaged smoked and cooked pork tenderloins in the packaging room.
9 CFR 416.15 regulatory requirements were not met.

13/51. Establishment did not adequately document the implementation, monitoring, and any corrective actions taken including preventive measures in its SSOP records. 9 CFR 416.16 (a) regulatory requirements were not met.

15/51. The procedures and frequency for monitoring were not adequately addressed in the written HACCP plan. The ongoing verification activities, calibration of process-monitoring instruments, direct observations of monitoring activities, corrective actions, and review of records were not adequately addressed in the written HACCP plan. All four parts of the corrective actions to be followed when a deviation occurs were not adequately addressed in the written HACCP plan. 9 CFR 417.2(c)(4)(7) 417.3 and 4(2) (i)(ii)(iii) regulatory requirement were not adequately met.

18/51. Monitoring procedures for zero fecal tolerance were not followed as written in HACCP plan. 9 CFR 417.2 (c)(4) regulatory requirements were not adequately met.

19/51. Plant ongoing verification of direct observation of monitoring activities, corrective actions, and the calibration of process-monitoring instruments did not meet 9 CFR 417.4(a)2(i)(ii) regulatory requirements.

20/51. Corrective actions records did not address all four parts of corrective actions. 9 CFR 417.3 (1)(2)(3)(4) regulatory requirements were not adequately met.

22/51. Entries on HACCP records for monitoring did not include critical limits, times, initial or signature, actual values. 9 CFR 417.5 (a)(2)(3) regulatory requirements were not adequately met.

48/51. One receptacle for inedible product was being used for storing edible product in the processing room. Establishment officials took corrective action. 9 CFR 416.3 regulatory requirements were not met.

51. There was no documentation in the inspection files that Government of Poland (GOP) meat inspection officials were complying with 9 CFR 417.8 (a) (c)(d) (f)(h) regulatory requirements.

52/51. Several hogs were not stunned effectively prior to being shackled, hoisted, thrown, cast, or cut causing in humane handling and slaughter. Corrective actions were taken following FSIS auditors observation. Corrective actions were not adequate to comply with 9 CFR 313 humane slaughter regulatory requirements.

57/51. There was no indication of any findings in the supervisory monthly records concerning aforementioned HACCP and SSOPs noncompliances. 9 CFR 417.8 regulatory requirements were not met.

58. Due to noncompliance with implementation of SSOPs, HACCP, humane handling and slaughter, and lack of enforcement requirements by the Government of Poland (GOP) meat inspection officials, the status of this establishment is not equivalent to that required in the U.S. program. All the above deficiencies were discussed with GOP meat inspection

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. F. Choudry & Dr. N. Memarian	12-23-03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Zaklady Miesne, Krotoszyn Ul. Kobylinska 14	12/03/03	17	Poland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. F. Choudry & Dr. N. Memarian		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58. Notice Intent to Delist	X
59.	

Est. 17 Audit Date 12/03/03 Processing Operation

15/51. The establishment did not address chemical, physical and biological hazards at each step of their hazard analysis. The packaging materials, spices, and other non-meat food ingredients were not addressed either in the flow chart or in their hazard analysis. 9 CFR 417.2(a)(1)(2) regulatory requirements were not met.

19/51. Plant ongoing verification of direct observation of monitoring activities, corrective actions, and the calibration of process-monitoring instruments were not adequately met 9 CFR 417.4(a)2(i)(ii) regulatory requirements.

20/51. The establishment failed to take corrective actions and preventive measures when carcass temperature deviation occurred in the cooler. Records for corrective action in response to a deviation from a critical limit were not adequately documenting the corrective actions and preventive measures. For example, there were no records that: (1) the cause of the deviation was eliminated; (2) the CCP was brought under control after corrective action was taken; (3) measures to prevent recurrence were established and (4) no product that was adulterated as a result of the deviation enters commerce. 9 CFR 417.3(a) regulatory requirements were not adequately met.

22/51. Entries on HACCP records for monitoring did not include critical limits, times, initial or signature, and actual values. 9 CFR 417.5(a)(2)(3) & (b) regulatory requirements were not adequately met.

51. Government of Poland (GOP) meat inspection officials were not adequately complying with HACCP regulatory requirements as required by 9 CFR 417.8 (a) (c) (d) (f) (h).

57/51. There was no indication of any findings with 9 CFR 417.8 in the supervisory monthly records concerning aforementioned HACCP noncompliances.

58. Government of Poland (GOP) meat inspection officials gave a Notice of Intent to Delist (NOID) to Establishment 17 regarding the inadequate implementation requirements for HACCP. GOP meat inspection official is to evaluate the adequacy of corrective actions and provide a full report to FSIS.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. F. Choudry & Dr. N. Memarian	12-23-03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Zaklady Miesne, Constar Starachowice Ul. Krancowa 4	12/01/03	33	Poland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr.F.Choudry & Dr.N.Memarian		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	X
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58. Notice of Intent to Delist	X
59.	

Est. 33 Slaughter & Processing Operations Audit Date 12/01/03

15/51. a) The establishment did not address chemical, physical, and biological hazards at each step of their hazard analysis as required by 9 CFR 417.2.
b) The written HACCP plan did not have adequate decision making documents associated with the selection of CCP's, critical limits, and the frequency of monitoring and verification procedures. 9 CFR 417.5 regulatory requirements were not met.
c) The hazard analysis did not include food safety hazards (fecal material and ingesta) that are reasonably likely to occur in the production process. There were no decision making documents to show why fecal and ingesta were not identified as food safety hazard. 9 CFR 417.2(a) and 417.5(a)(2) were not met.

18/51. The critical control point (at the evisceration station) for slaughter room had zero tolerance (CL) for bruises, organs, spinal cord, internal fat, toe nails, hair, and blood clot. Monitoring and verification of this CCP was not performed at the designated CCP location. 9 CFR 417.2(c) (4)(7) regulatory requirements were not met.

19/51. Plant ongoing verification of direct observation of monitoring activities, corrective actions, and the calibration of process-monitoring instruments did not comply with 9 CFR 417.4(a)2(i)(ii) regulatory requirements.

20/51. The establishment failed to take corrective actions and preventive measures when deviation from critical limits mentioned in item 18 occurred in slaughter room. 9 CFR 417.3(a)(b) regulatory requirements were not met.

22/51. Monitoring, corrective actions, and plant verification records were not adequately maintained. Actual values, initial or signature, and time were not documented on their monitoring records. Records for corrective actions in response to a deviation from a critical limit were not documented the corrective actions as required by 9 CFR 417.3(a) regulatory requirements.

51. There was no documentation in the inspection files that Government of Poland (GOP) meat inspection officials were adequately complying with 9 CFR 417.8 (a) (c) (d) (f) (h) regulatory requirements.

57/51. There was no indication of any findings in the supervisory monthly records concerning aforementioned HACCP noncompliance. 9 CFR 417.8 regulatory requirements were not met.

58. GOP meat inspection officials gave a Notice of Intent to Delist (NOID) to Establishment 33 regarding inadequate implementation of regulatory requirements for HACCP. Polish Veterinary Inspection official is to evaluate the adequacy of corrective actions and provide a full report to FSIS.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. F. Choudry & Dr. N. Memarian	12-23-03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Zaklady Miesne, Morliny Ostroda	11/26/03	131	Poland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. F. Choudry & Dr. N.Memarian		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58. Notice Intent to Delist	X
59.	

Est. 131 Audit date 11/26/03 Slaughter & Processing Operations

11/51. Establishment officials were not routinely evaluated the adequacy and effectiveness of the Sanitation SOP's to prevent direct product contamination. There were no records of any deficiencies concerning SSOPs for the last two months. 9 CFR 416.14 regulatory requirements were not met.

12/51. a) Contaminated/suspected swine carcasses were diverted to a congested retain rail for disposition. They were in direct contact with other suspected or contaminated carcasses. Government of Poland (GOP) officials took corrective actions.
b) Dripping condensate from ceilings, that was not cleaned/sanitized daily, was falling onto containers for edible product after washing in the storage room. Government of Poland (GOP) officials took corrective actions.
9 CFR 416.15 regulatory requirements were not met.

13/51. Establishment did not adequately document the implementation, monitoring, and any corrective actions taken including preventive measures in its SSOP records. 9 CFR 416.16 (a) regulatory requirements were not met.

15/51. a) Calibration of process monitoring instruments, direct observations of monitoring activities, and the frequency with which those procedures will be performed were not listed in the HACCP plan. However, the calibration of process monitoring equipment was being performed. 9 CFR 417.2 (c)(7) regulatory requirements was not met.
b) The hazard analysis did not include food safety hazards (fecal material and ingesta) that are reasonably likely to occur in the production process. There were no decision making documents to show why fecal and ingesta were not identified as food safety hazard. 9 CFR 417.2(a) and 417.5(a)(2) were not met.

19/51. Ongoing verification such as direct observation of monitoring activities, corrective actions, review of records, and the calibration of process-monitoring instruments were not complying with 9 CFR 417.4 (a)(2) (i)(ii)(iii).

20/51. There were no corrective actions in response to a deviation from a critical limit at the CCP1. Carcasses with fecal contamination passed the critical control point at the evisceration station. Corrective actions written in the establishment HACCP plan did not comply with 9 CFR 417.3(a)(1) (2) (3)(4) regulatory requirements.

22/51. Records documenting the monitoring of critical control points did not include the recording of actual values, critical limits, time, and initial or signature by the monitorer. 9 CFR 417.5(a)(3) and 417.5(b) regulatory requirements were not met.

51. There was no documentation in the inspection files that GOP meat inspection officials were adequately complying with HACCP regulatory requirements as required by 9 CFR 417.8 (a)(c)(d)(f)(h) and 9CFR 416.4.

57/51. There was no indication of any findings in the supervisory monthly records concerning aforementioned HACCP noncompliances. 9 CFR 417.8 regulatory requirements were not met.

58. GOP meat inspection officials gave a Notice of Intent to Delist (NOID) to Establishment 131 regarding inadequate implementation of SSOP's and HACCP programs. Polish Veterinary Inspection official is to evaluate the adequacy of corrective actions and provide a full report to FSIS.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. F. Choudry & Dr. N. Memarian	12-23-03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Zaklady Miesne, Elk Ul. Suwalska 86	11/27/03	139	Poland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr.F. Choudry&Dr.N. Memarian		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	X
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58. Unacceptable	X
59.	

Est. 139 Audit Date 11/27/03 Slaughter & Processing Operation

11/51. Establishment officials were not adequately verifying the adequacy and effectiveness of the Sanitation SOP's to prevent direct product contamination. There were no records indicating any significant findings concerning SSOP's for the last two months. 9 CFR 416.14 regulatory requirements were not met.
12/51. a) Dried pieces of meat, fat, and product residues from previous day's operation were observed on brine solution injecting machine in the processing room.
b) A plastic conveyor belt for edible product had product residues in its broken and loose paddles from previous day's operation in the processing room.
c) Neck and jowls of hog carcasses were contacting employees' work platform and employees' boots in the boning room.
d) Dripping condensate, from overhead pipes and rail that was not cleaned/sanitized daily, was falling onto carcasses in the corridor between cooler and the boning room.
e) Accumulation of fat and black discoloration residue were observed inside of automatic washing/sanitizing viscera cabinet during the operation in the swine slaughter room.
f) Numerous metal containers with open gaps and rough cracked edges had product residues from previous day's operation in the processing room. Establishment officials took corrective actions.
9 CFR 416.15 regulatory requirements for above items were not met.
13/51. Establishment did not adequately document the implementation, monitoring, and any corrective actions taken including preventive measures in its SSOP records. 9 CFR 416.16 (a) regulatory requirements were not met.
15/51. The establishment did not address chemical, physical, and biological hazards at each step of its hazard analysis. Ongoing verification activities, calibration of process-monitoring instruments, direct observations of monitoring activities, and review of records were not adequately addressed in the written HACCP plan. 9 CFR 417.2(a) and 417.4(a)(2) regulatory requirements were not adequately met.
18/51. The establishment failed to meet its critical limit for any physical contamination including zero tolerance for fecal materials. Monitoring of CCP was not documented the actual measurement of the critical limits (9CFR 417.5(3). Several beef carcasses were observed with fecal materials, hair, and dirt in the coolers. Beef quarters and hams were observed with hair, dirt, and rail dust in the boning room. The establishment failed to take corrective actions and preventive measures as required by 9 CFR 417.3(a).
19/51. Plant ongoing verification of direct observation of monitoring activities, corrective actions and the calibration of process-monitoring instruments did not comply with 9 CFR 417.4(a) 2 (i)(ii) regulatory requirements.
20/51. The establishment failed to take appropriate corrective actions when a deviation from critical limit (any physical contamination including fecal zero tolerance) occurred in beef and swine carcasses as required by 9 CFR 417.3(a).
22/51. Records documenting the monitoring of critical control points did not include the actual values, critical limits, time, and initial or signature. 9 CFR 417.5 regulatory requirements were not adequately met.
39/51. Overhead supports had rust in several locations over exposed products (no product contamination was observed) in the boning room. 9 CFR 416.2(b) regulatory requirements were not adequately met.
51. a) There was no documentation in the inspection files that Government of Poland (GOP) meat inspection officials were adequately complying FSIS 417.8 (a) (c) (d) (f) (h) regulatory requirements.
b) Government of Poland inspection officials were not verifying the adequacy and effectiveness of the sanitation SOPs as required by FSIS 9 CFR 416.17.
57/51. There was no indication of any findings in the supervisory monthly records concerning aforementioned HACCP noncompliances. 9 CFR 417.8 regulatory requirements were not met.
58. Establishment 139 was given a Notice of Intend to Delist (NOID) for noncompliance with implementation of SSOP's and HACCP programs in the last audit on 9/24/02. Due to continuous noncompliance with implementation of SSOP, HACCP, and lack of enforcement by GOP meat inspection officials, the status of this establishment is not equivalent to that required in the U.S. program. All the above deficiencies were discussed with GOP meat inspection officials and they agreed to remove Establishment 139 from the list of establishments eligible to export meat and meat products to the United States, effective November 27, 2003.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. F. Choudry & Dr. N. Memarian	12-23-03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Zaklady Miesne, Bialystok Ul. Pozioma 2	11/28/03	140	Poland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. F. Choudry & Dr. N. Memarian		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	X
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58. Unacceptable	X
59.	

Est. 140 Audit Date 11/28/03 Slaughter & Processing Operations

11/51. Establishment officials were not routinely evaluated the adequacy and effectiveness of the Sanitation SOP's to prevent direct product contamination. There were no records of any deficiencies concerning SSOPs for the last two months. 9 CFR 416.14 regulatory requirements were not met.
12/51. a) Dried pieces of product residues and grease from previous day's operation were observed on the product contact surfaces of the following equipment: several smoke sticks, meat scrapper, racks, and brine injection machine in the processing room. Establishment officials took corrective action.
b) Contaminated/suspected swine carcasses were diverted to a congested retain rail for disposition. They were in direct contact with other suspected or contaminated carcasses.
c) Dirt and heavy accumulation of black residue materials were observed inside the stainless steel smoke house's ducts. This smoke house was being used to wash and sanitize racks for edible product. Unclean water was dripping onto racks from smoke house ceilings and overhead ducts resulting cross contamination of racks.
9 CFR 416.15 regulatory requirements were not adequately met.
13/51. Establishment did not adequately document the implementation, monitoring, and any corrective actions taken including preventive measures in its SSOP records. 9 CFR 416.16 (a) regulatory requirements were not met.
14/51. The written HACCP plan did not have decision making documents associated with the selection of CCP's, critical limits, and the frequency of monitoring and verification procedures. 9 CFR 417.5(a)(2) regulatory requirements were not met.
15/51. The written HACCP plan did not list the critical limits that must be met at each of the CCPs and the corrective actions to be followed in response to any deviation from a critical limit at a CCP and the verification procedures and the frequency with which those procedures will be performed. 9 CFR 417.2 (c)(3)(5)(7) regulatory requirements were not met.
18/51. Monitoring frequency for cooked sausages was not performed as written in HACCP plan (3 times during the process). 9 CFR 417.2 (c)(4) regulatory requirements were not met.
19/51. Plant ongoing verification of direct observation of monitoring activities, corrective actions, and the calibration of process-monitoring instruments were not complying with 9 CFR 417.4(a)2(i)(ii) regulatory requirements.
20/51. The establishment failed to monitor and to take corrective actions when fecal zero tolerance deviation occurred in the slaughter room. Two beef carcasses were observed with fecal contamination in the cooler. One beef quarter with fecal and two with hair and dirt were found in the boning room. 9 CFR 417.3(a)(3) regulatory requirements were not met.
22/51. The records to document ongoing verification and monitoring of critical control points did not include the recording of actual values, critical limits, time, and initial or signature. 9 CFR 417.5(a)(3) regulatory requirements were not met.
51. a) There was no documentation in the inspection files that Government of Poland (GOP) meat inspection officials were adequately complying with 9 CFR 417.8 (a) (c) (d) (f) (h) regulatory requirements.
b) GOP meat inspection officials did identify sanitation deficiencies on their pre-operational and operational sanitation records. Preventive measures were documented as required by 9 CFR 416.17.
57/51. There was no indication of any findings in the supervisory monthly records concerning aforementioned SSOPs and HACCP noncompliances. 9 CFR 417.8 regulatory requirements were not met.
58. Due to noncompliance with implementation of SSOP, HACCP, and lack of enforcement requirements by the Government of Poland (GOP) meat inspection officials, the status of this establishment is not equivalent to that required in the U.S. program. All the above deficiencies were discussed with GOP meat inspection officials and they agreed to remove Establishment 140 from the list of establishments eligible to export meat and meat products to the United States, effective November 28, 2003.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. F. Choudry & Dr. N. Memarian	12-23-03

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Zaklady Miesne, Prime Food Sp. Z o.o. 77-320 Przechlewo Ul. Mlyiska	11/25/03	3431	Poland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. F. Choudry & Dr.N. Memarian		X ON-SITE AUDIT ___ 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	X
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58. Notice of Intent to Delist	X
59.	

Translation of the letter:

Warsaw, May 25, 2004

Sally Stratmoen
Director International
Equivalence Staff Office
of International Affairs

Dear Dr. Stratmoen,

In connection to our letter No:GIWhig.US 501 /2a/04 dated February 19, 2004, I would like to inform you that the Chief Veterinary Officer has two comments to the Final Draft Audit Report on the Polish system of official meat inspection carried out in Poland from November 19 to December 16, 2003.

First comment regards chapter 6 point 6.1.1. After statement: "*or part time employees*", words "*of the Department of Food Safety and Veterinary of the Ministry of Agriculture and Rural Development* (DFSV)".

The official veterinarians employed in the Veterinary Inspection were according to the Law on Fighting Contagious Animal Diseases, Inspection of Slaughter Animals and Meat and Veterinary Inspection, dated April 24, 1997 (Law Paper 1999, No. 66, position 752 with amendments) were not employees of the DFSV.

The next problem regards some doubts to observations of FSIS inspectors presented in chapter 11 point 11.1 of the Draft Report in the area of non-human slaughter of animals.

At the exit meeting on December 16, 2003, the FSIS auditors presented a point of view that control of effective stunning (surgical anastesia) before further slaughter activities should be based among others on:

1. Evaluation of muscle flabbiness
2. Evaluation of involuntary movements (clonic movements)
3. Evaluation of reaction to touching impulses of eye cilia.

In case of one plant during presence of inspectors, during second inspection after implementation of corrective action, first and second conditions were fulfilled. However, certain animals were still reacting positive to touching impulses of eye cilia.

FSIS Directive 6900.2 rev. 1 dated November 1, 2003 does not precisely define signs of surgical anastesia. In addition, the Directive was published when FSIS inspection was carried out in Poland, which made impossible fast transmission of requirements to the veterinary inspectors at the provincial and county levels.

We would like to emphasize that we are putting a lot of attention to human handling and slaughter of animals. We would be grateful for sending us (advice) directives regarding inspection of proper stunning of hogs, in particular regarding evaluation of its effectiveness based on aforementioned three signs of proper electric stunning. We would also be grateful for information whether during such an inspection, all three symptoms are treated equally and are put together as symptoms of full anastesia. Out of Polish experience it turns out that appearance of the cilia reflex not always indicates improper stunning, but only action of the VII nervus facialis which is not reflecting a feeling of pain of the stunned animal.

We have no further comments to the Draft Report.

In addition, we would like to update you about our activities, which were carried out until today in order to fulfill USDA requirements regarding inspection of plants eligible for export of meat products to the U.S.

1. From April 14 to April 16, 2004, representatives of meat plants interested in exporting to the U.S. were trained on enforcement and maintenance of SSOP, SOP's and HACCP systems in plants manufacturing meat products.
2. From May 17 to May 21, 2004, there was training for official veterinarians from county, provincial and national levels regarding requirements of the FSIS Directive 5000.1 and enforcement actions in case when requirements are not fulfilled.
3. FSIS Directives 5000.1 rev.1 and 6900.2,rev.1 were translated and transmitted to provincial and county veterinary officers.
4. By May 28, 2004, translated forms of protocols of non-compliance used by FSIS inspectors in the U.S. will be transmitted to appropriate authorities.

Our detailed plan of corrective actions taking into consideration frequency and method of veterinary inspection and translation of the manual regarding enforcement will be submitted to you via the Agricultural Office of the U.S. Embassy in Poland by the end of May 2004.

We would like to emphasize that training carried out by the HACCP Counsulting Group was extremely useful in proper understanding of requirements and action of FSIS regarding meat plants. Many doubts were clarified. The approach for proper veterinary inspection of meat plants was corrected. However, full implementation of all procedures of the Veterinary Inspection in Polish meat plants eligible for export of meat products may, for obvious reasons, take more time than we thought before the training.

It regards for example corrective action in surveillance of the Veterinary Inspection over SSOP and HACCP system, especially at the county and provincial level.

An important element of the corrective action considered by us is participation of the General Veterinary Inspectorate in surveillance of the control system of requirements which are in line with U.S. law.

We have to evaluate the current system of surveillance and create a new approach to inspection of plants which will require creation of new procedures and instructions which will reflect FSIS manuals, however, they will take into consideration Polish administrative and authority structure.

In addition, we would like to analyze and present a list of meat plants which out of 13 plants currently eligible for export to the U.S. are meeting aforementioned U.S. requirements.

This is why we would be grateful if the next FSIS audit in Poland could be delayed until October 2004.

Sincerely,

Andrzej Rudy
Deputy CVO

Warszawa, dn. 25 maja 2004 r.

INSPEKCJA WETERYNARYJNA

ZASTĘPCA
GŁÓWNEGO LEKARZA WETERYNARII

dr Andrzej Rudy

GIWhig. US 501 /2b /04

Pani Sally Stratmoen
Dyrektor International
Equivalence Staff Office
of Internationall Affairs

Szanowny Panie Radco,

W nawiązaniu do naszego pisma znak: GIWhig. US 501 /2a /04 z dnia 19 lutego 2004r. uprzejmie informuję, że Główny Lekarz Weterynarii wnosi dwie uwagi do projektu raportu końcowego z audytu obejmującego polski system urzędowej kontroli mięsa, przeprowadzonego w Polsce w dniach 19 listopada – 16 grudnia 2003r.

Pierwsza uwaga dotyczy rozdziału 6 pkt 6.1.1. po słowach „ lub niepełnoetatowymi pracownikami" należy wykreślić słowa „Departamentu Bezpieczeństwa Żywności i Weterynarii Ministerstwa Rolnictwa i Rozwoju Wsi".

Urzędowi lekarze weterynarii zatrudnieni w Inspekcji Weterynaryjnej zgodnie z ustawą z dnia 24 kwietnia 1997 r. o zwalczaniu chorób zakaźnych zwierząt, badaniu zwierząt rzeźnych i mięsa oraz o Inspekcji Weterynaryjnej (Dz. U. z 1999 r. Nr 66, poz. 752 z późn. zm.) nie byli pracownikami MR i RW.

Kolejny problem dotyczy wątpliwości co do spostrzeżeń inspektorów FSIS zawartych w rozdziale 11 pkt 11.1. projektu raportu wykazujących uchybienia w zakresie niehumanitarnego uboju zwierząt .

Na spotkaniu końcowym w dniu 16 grudnia 2003r. audytorzy FSIS przedstawili pogląd, że kontrola skutecznego oszołomienia (znieczulenie chirurgiczne) przed dalszymi czynnościami ubojowymi polegać powinna między innymi na :

1) ocenie zwiotczenia zwierzęcia,
2) ocenie ruchów mimowolnych (klonicznych)
3) ocenie reakcji na bodźce dotykowe rzęsek oka.

W omawianym przypadku jednego zakładu w czasie obecności inspektorów, po dokonaniu działań korygujących, podczas kolejnej oceny spełnione były dwa pierwsze warunki. W przypadku reakcji dotykowej rzęsek oka niektóre zwierzęta reagowały pozytywnie.

Dostępna obecnie Inspekcji Weterynaryjnej Dyrektywa FSIS 6900.2, rev 1 z 25 listopada 2003r. nie precyzuje dokładnie oznak znieczulenia chirurgicznego, a ponadto Dyrektywa ta została opublikowana w trakcie trwania inspekcji FSIS w Polsce, co uniemożliwiło szybkie przekazanie nowych wymagań inspektorom weterynaryjnym szczebla wojewódzkiego i powiatowego.

Pragniemy podkreślić, że strona polska przykłada wielką wagę do przepisów odnoszących się do humanitarnego obchodzenia się i uboju zwierząt, bylibyśmy, zatem wdzięczni za przekazanie nam wskazówek dotyczących kontroli prawidłowego oszołamiania świń w szczególności dotyczących oceny jego skuteczności na podstawie ww. trzech oznak

prawidłowego oszołomienia elektrycznego. Bylibyśmy także wdzięczni za uzyskanie odpowiedzi, czy podczas takiego badania wszystkie trzy symptomy są traktowane na równi i składają się na objawy pełnego znieczulenia. Z polskich doświadczeń wynika, iż wystąpienie odruchu rzęskowego nie zawsze jest oznaką niewłaściwego oszołomienia, a jedynie działania VII nerwu twarzowego (nervus facialis) co nie przekłada się na odczuwanie przez oszołomione zwierzęta bólu.

Strona Polska nie wnosi uwag do reszty projektu raportu.

Ponadto chcielibyśmy przedstawić dokonane do dnia dzisiejszego działania strony polskiej w celu spełnienia wymagań USDA w zakresie kontroli zakładów posiadających uprawnienia do eksportu produktów mięsnych do USA.

1. W dniach 14 – 16 kwietnia 2004r. odbyło się szkolenie przedstawicieli zainteresowanych zakładów mięsnych dotyczące wdrażania i utrzymania systemów SOP,SSOP oraz HACCP w podmiotach produkujących wyroby mięsne .
2. W dniach 17 – 21 maja 2004r. odbyło się szkolenie urzędowych lekarzy weterynarii szczebla powiatowego, wojewódzkiego oraz głównego dotyczące wymagań Dyrektywy FSIS 5000.1 rev 1 oraz działań egzekucyjnych w przypadku stwierdzenia nie przestrzegania wymagań.
3. Przetłumaczone na język polski Dyrektywa FSIS 5000.1 rev 1 oraz Dyrektywa FSIS 6900.2, rev 1 zostały przekazane wojewódzkim i powiatowym lekarzom weterynarii.
3. Do dnia 28 maja 2004r. zostaną przekazane tłumaczenia formularzy protokołów niezgodności stosowane przez inspektorów FSIS w USA.

Szczegółowy plan działań korygujących uwzględniający częstotliwość i sposób nadzoru inspekcji weterynaryjnej oraz tłumaczenie manuału obejmującego działania egzekucyjne zostanie przekazany Ambasadzie USA w Polsce do końca maja 2004r.

Pragniemy podkreślić, że przeprowadzone przez firmę HACCP Consulting Group szkolenie było niezwykle przydatne w prawidłowym zrozumieniu wymagań oraz postępowania FSIS w stosunku do zakładów mięsnych. Wyjaśniono wiele wątpliwości i skorygowano sposób podejścia IW do właściwego nadzoru nad zakładami, z tym, że pełne wdrożenie wszystkich postępowań Inspekcji Weterynaryjnej w stosunku do polskich podmiotów zatwierdzonych do eksportu produktów mięsnych ze zrozumiałych względów może zabrać nieco więcej czasu niż sądziliśmy przystępując do szkolenia.

Dotyczy to np. dokonania korekt w nadzorze IW nad systemem SSOP i HACCP, w szczególności roli szczebla powiatowego oraz wojewódzkiego.

Ważnym elementem działań korygujących branym pod uwagę przez stronę polską jest udział Głównego Inspektoratu Weterynarii w nadzorze nad systemem kontroli wymagań zgodnych z prawodawstwem USA.

Należy, więc wnikliwie ocenić obecny system nadzoru oraz stworzyć nowe podejście do kontroli zakładów, co będzie wiązało się ze stworzeniem określonych procedur i instrukcji będących odzwierciedleniem przewodników FSIS, ale uwzględniających polską strukturę administracyjną i kompetencyjną.

Ponadto strona polska pragnie przeanalizować i przedstawić listę zakładów mięsnych, które spośród 13 obecnie zatwierdzonych spełniają wymagania ww. przepisów USA.

Bylibyśmy, zatem wdzięczni za odłożenie ponownego audytu FSIS w Polsce do października 2004r.

Z poważaniem

ZASTĘPCA
GŁÓWNEGO LEKARZA WETERYNARII

dr Andrzej Rudy