DETERMINING THE INITIAL EQUIVALENCE OF FOREIGN FOOD SAFETY SYSTEMS

I. PURPOSE

This directive provides instructions to FSIS personnel for making initial determinations of equivalence regarding foreign food safety systems.

KEY POINTS:

- Outlines the process FSIS personnel follow when responding to foreign governments’ requests for determinations of initial equivalence, including the collection and analysis of foreign inspection system documentation
- Outlines FSIS personnel’s roles and responsibilities when conducting initial equivalence reviews, on-site equivalence audits, and the reporting of equivalence review and audit findings
- Provides general information on notice and comment rulemaking related to an initial determination of equivalence
- Identifies the requirements and tasks associated with reinstatement of foreign country equivalence

II. BACKGROUND

A. The concept that different sanitary measures in one country can achieve the appropriate level of protection in another country is called “equivalence.” The principle of equivalence is grounded in the World Trade Organization’s Sanitary and Phytosanitary Measures Agreement and was adopted by the United States in amendments to the Federal Meat Inspection Act (FMIA), Poultry Products Inspection Act (PPIA), and the Egg Products Inspection Act (EPIA). Foreign meat, poultry and egg products food regulatory systems may apply alternative sanitary measures to eliminate or abate food safety hazards if those measures provide the same level of public health protection achieved by U.S. measures.

B. Regulatory requirements for equivalence are set forth in 9 CFR 327.2 for meat products, 9 CFR 381.196 for poultry products, and 9 CFR 590.910 for egg products. FSIS has categorized these requirements into six “equivalence components.” Specifically, FSIS evaluates a country’s national government to ensure that it is imposing equivalent requirements with respect to: (1) government oversight, (2) statutory authority and food safety regulations, (3) sanitation, (4) hazard analysis and critical control points (HACCP), (5) chemical residues, and (6) microbiological testing programs. This process for determining equivalence is described fully at: http://www.fsis.usda.gov/wps/wcm/connect/24bbe45a-bd13-4997-93ea-30f77d947990/eqprocess.pdf?MOD=AJPERES.
C. FSIS receives information from foreign governments on why their food safety system is equivalent to that of the United States in a Self-Reporting Tool (SRT). The SRT is a questionnaire that provides a means for the foreign government to characterize its inspection system using the six equivalence components. Information in the SRT is used to populate the Component Analysis Verification Form (CAVF). The CAVF is used by FSIS auditors in assessing the equivalence of foreign inspection programs. It provides a systematic tool that Equivalence Officers (EO) and International Auditors use in analyzing whether the principal components of a foreign government’s inspection system (Government Oversight, Statutory Authority and Food Safety Regulations, Sanitation, HACCP, Chemical Residues, and Microbiological Testing Programs) provide an equivalent level of protection to the U.S. system and for documenting results of that analysis. The CAVF forms the basis for audit planning, scope, and reporting and identifies the records and processes that an auditor is to assess during an on-site equivalence audit.

D. If the auditor finds that there is reason to believe that the foreign system is equivalent to that of the U.S., FSIS will institute notice and comment rulemaking under the Administrative Procedure Act. If, after considering the comments that it receives, FSIS determines that the country’s system is in fact equivalent, it will issue a final rule that lists the country in the appropriate section of the Code of Federal Regulations. The country will then be eligible to export meat, poultry, or egg products to the United States.

III. INITIAL EQUIVALENCE DETERMINATION PROCEDURES

A. Upon receipt of a written request for a determination of initial equivalence from a foreign government, the OPPD International Equivalence Staff (IES) Director assigns an EO as the project lead.

B. The EO is to:

1. Send an FSIS acknowledgement letter to the foreign government within 10 calendar days that lists those products that the government stated it is interested in exporting to the U.S. and that includes a link to the SRT form. The SRT is structured to collect information that addresses the equivalence criteria applicable to the species and type of product to be exported. The SRT may be structured to accommodate countries that wish to be assessed for processing only, and not for slaughter, or that wish to be assessed for a limited number of species or products. The acknowledgement letter (see Attachment 1) conveys U.S. requirements concerning foreign inspection systems and provides instructions on the completion of the SRT and on the necessary supporting documentation;

2. Provide information on U.S. laws, regulations, and policy guidance governing the production of meat, poultry, or egg products for human consumption; and

3. Set up an initial equivalence project plan (see Attachment 2) for that country that identifies the step-by-step components of the initial equivalence process. The project plan is used to document all activities related to the initial equivalence process. The EO is responsible for updating the project plan at least once a month.

C. If the foreign government does not provide an SRT response within one year of the date of the FSIS acknowledgement letter, or fails to respond to requests for information from the EO within that period of time, the EO is to designate the country’s file inactive. The EO is to keep an inactive file open for one year, after which the EO is to close country’s initial equivalence file.

D. After 24 months of inactivity, the EO is to notify the CCA in writing that FSIS has closed its file, and that the foreign government can request that the file be reopened at any time. If a foreign CCA requests that a file be reopened, the EO is to determine whether a new SRT will be necessary.
E. Once a CCA submits what it considers to be a completed SRT with supporting documentation, the EO is to:

1. Arrange for document translations as needed;
2. Provide an initial review and assessment of the SRT responses and communicate with the foreign government to address any gaps or issues with the submitted information;
3. Enter the completed SRT and supporting documentation into SharePoint/PHIS;
4. Develop a CAVF to document the SRT-derived information on the foreign inspection program for each of the six equivalence components and to identify verification activities (Section 4 – SRT Planning-Audit Verification Methodology) to be conducted during the initial equivalence on-site audit;
5. Use the completed CAVF to develop an audit verification plan that outlines the scope of the audit and identifies the laws, regulations, processes, records, and facilities to audit.

F. The IES Director is to assemble a multidisciplinary Equivalence Review Team of subject matter experts to assist the EO in a technical review of the foreign government’s SRT responses and associated documentation. The IES Director is to select members for the team from:

1. The International Audit Staff (IAS)/Office of Investigation, Enforcement, and Audit (OIEA);
2. The Science Staff (SciS)/Office of Public Health Science (OPHS) – food chemistry and microbiology; and
3. Additional FSIS subject matter experts as needed.

G. Review team members are to review SRT responses and supporting documentation, along with the EO’s initial review of same. When team members have completed their reviews, and they have determined that the SRT responses and supporting documentation appear to establish initial equivalence with all six equivalence components, team members are to participate in pre-audit correlation meetings organized by the EO to review and provide feedback on the CAVF and audit verification plan developed by the EO. Whenever possible, team members are to participate in the on-site audit and assist with post-audit reporting. There may be circumstances, however, that preclude the same members of the review team from participating in the audit. In these cases, the EO is to ask the supervisor of the review team member to designate a replacement.

1. The EO is to convene and document review team meetings and coordinate correlation sessions to reconcile assessments of foreign inspection system design that is shared across multiple SRT components.
2. The review team is to review the SRT and to evaluate whether the CCA adequately addresses each of the six equivalent components. The six equivalent components include:
   a. Government Oversight;
   b. Statutory Authority and Regulation;
   c. Sanitation;
   d. HACCP;
e. Chemical Residue Monitoring and Testing Programs;

f. Microbiological Testing Programs.

3. Equivalence criteria for FSIS sanitary measures are embedded within the SRT and are also found on Sharepoint at: http://dcvm4sps1/sites/OIA/IAS/EQ%20Criteria/IES%20Equivalence%20Criteria/Forms/AllItems.aspx. If equivalence criteria do not exist for a given foreign sanitary measure, the review team, at the direction of the EO, is to develop criteria to evaluate the measure.

4. To develop equivalence criteria, the review team is to:

   a. Identify the relevant FSIS food safety requirements related to the foreign sanitary measure;

   b. Identify the objective of the FSIS food safety requirement and the expected outcomes;

   c. Establish measurable points (outcomes) associated with the FSIS food safety requirement that need to be satisfied by the foreign sanitary measure; and

   d. Identify and request any additional information needed to establish a conclusive comparison between the foreign sanitary measure and the measurable points identified for the FSIS food safety requirement.

5. Within 120 calendar days of receiving a foreign government’s SRT response in English, or the completed translated documents, the EO is to document in a CAVF the team’s conclusions based on their initial document review.

6. Within 10 calendar days of completing the document review, assuming that all necessary information has been received from the foreign government, the EO is to use the CAVF analysis to prepare a Decision Memorandum (Audit) (see Attachment 3) for clearance by the IES Director. The Decision Memorandum (Audit) summarizes the results of the document review as a comparative analysis of FSIS’s and the applicant country’s requirements, and whether the equivalence criteria have been satisfied for each component. If all equivalence criteria have been met, the EO is to provide a justification for proceeding to an in-country audit. This audit justification is to explain why the documentation supports that the foreign country’s foods regulatory system 1) addresses all matters addressed by U.S. requirements in the same or an equivalent manner and 2) cumulatively establishes the same level of public health protection as U.S. domestic requirements.

7. The EO is to summarize the following in the initial equivalence Decision Memorandum (Audit):

   a. Applicant country’s SRT response;

   b. Equivalence criteria against which applicant country’s food safety system has been evaluated; and

   c. The team’s evaluation of the applicant country’s system, including recorded minutes of document review meetings.

8. The IES Director is to review the decision memorandum and, when satisfied with its content, is to send the decision memorandum to the program AAs represented on the initial equivalence review team (generally OPPD, OIEA, and OPHS) and ask for their review and concurrence within 20 days, before sending the Decision Memorandum (Audit) to OA for review and concurrence with recommended next steps.
IV. PREPARING FOR THE INITIAL EQUIVALENCE AUDIT

Procedures related to the preparation and scheduling of on-site initial equivalence audits are as follows:

1. Once the Agency has decided to conduct an initial equivalence audit, the EO is to submit a draft audit notification letter (see Attachment 4) to the IES Director for clearance. The letter is to be prepared to notify the applicant country’s CCA of the decision to audit, to suggest a date for the start of the audit (including date of entrance conference), and to advise the CCA of the objectives, and the scope of the initial equivalence audit. The audit plan is to be included as an attachment to this letter.

2. The EO is to ensure that the audit notification letter and audit plan are delivered to the applicant foreign government 45 days before to the audit start date that FSIS is suggesting. The EO is to refer to the country correspondence c.c. list on the IES SharePoint site for distribution instructions for audit notification letters. Access the CVO List for correspondence c.c. contacts at http://dcvm4sps1/sites/OIA/CVOList/CVO%20List/Forms/AllItems.aspx

3. The IES EO and the review team are to follow a pre-audit checklist (see Attachment 5) to arrange the in-country audit. Sixty calendar days before the audit entrance meeting, the EO is to:
   a. Complete the SRT and CAVF and circulate them to the Review Team for review and comment;
   b. Review third party audit reports of the applicant country that have been published by the CCAs of countries equivalent to the U.S. within the last three years;
   c. Review the applicant country’s residue monitoring plan; and
   d. Select establishments, laboratories, and government offices to be audited.

4. The IES EO is to select the places that the auditors will visit based on the volume of production and relative hazard associated with products that the CCA is seeking to export to the United States. Thus, in making selections, the EO is to focus on:
   a. Government offices that oversee the inspection personnel at establishments that produce higher volumes of higher risk products¹;
   b. Laboratories that conduct pathogen or chemical testing of products from establishments that produce higher volumes of higher risk products; and
   c. Establishments that produce higher volumes of higher risk products.

5. The IES EO is to select establishments for review based on a 95 percent confidence level that at least one deficient establishment will be reviewed, assuming that, of all establishments proposed for U.S. export certification, 20% will be deficient. Thus, EO selection of establishments for audit is as follows:

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6. After selecting facilities for audit, the EO and the review team are to develop and submit a proposed audit plan, notification letter, and itinerary to the IES Director for review 40 calendar days prior to the entrance meeting and
   a. Set the time and date for a pre-exit meeting with OPPD;
   b. Review APHIS animal disease status for the applicant country;
   c. Request travel authorization through OAA-OPPD for the Administrator’s signature;
   d. Submit a proposed audit itinerary to the CCA through the FAS Agricultural Attache assigned to that country.

7. 30 calendar days prior to entrance meeting, the EO and the review team are to:
   a. Submit AD-121 passport/visa request;
   b. Prepare a country clearance letter for transmission through FAS;
   c. Schedule in-country meeting with FAS; and
   d. Finalize translation arrangements, the audit itinerary, and logistics with the CCA (lodging, daily schedule, flight/transportation schedules).

8. 15 calendar days prior to entrance meeting, the EO and the review team are to:
   a. Collate audit forms (Establishment Checklist – See Attachment 6);
   b. Assemble relevant FSIS and CCA documents (statutes, regulations, directives, notices, compliance guides);
   c. Secure their passports, country clearances, and travel authorizations;
   d. Prepare and clear entrance slides with IES Director. Entrance slides are to outline the audit objectives, scope, and itinerary;
   e. Conduct a pre-entrance meeting with IES and the International Relations and Strategic Planning Staff; and
   f. Secure loaner USB memory sticks, laptops, and BlackBerry (phone).

9. Each review team member is to:
a. Familiarize himself or herself with SRT responses and supporting documentation provided by the foreign CCA; and 

b. Contribute to the development of audit verification points in the CAVF.

V. PROCEDURES RELATED TO THE CONDUCT OF THE ON-SITE AUDIT

A. Based on their analysis of documentation collected from foreign governments through the SRT, the EO and the review team should have enough information to make a tentative determination as to whether a country will be able to maintain an inspection system equivalent to that of FSIS. Only after the audit is actually conducted, however, would the Agency be able to decide whether to initiate rulemaking to add the country to the list in the CFR of countries eligible to export meat, poultry, or egg products to the United States. The audit is necessary to provide the basis for a determination of equivalence in that it allows FSIS to assess operational equivalence by observing the CCA’s implementation of the requirements it would enforce should FSIS grant equivalence through the publication of a final rule.

B. In order to expedite the rulemaking process, the initial equivalence review team is to structure the in-country audit to assess whether the CCA can demonstrate that the country has an equivalent inspection system to FSIS. The audit is to assess how the country is implementing the laws, regulations, inspection procedures, and enforcement protocols considered by FSIS during the document review process.

C. Upon arrival in-country, the review team is to meet with FAS, if requested by FAS, to provide a courtesy briefing that outlines the audit objective, scope, and itinerary and to obtain a security and protocol briefing from FAS.

D. The EO is to conduct the audit entrance conference with the CCA, presenting the pre-approved entrance slides that outline audit objectives, scope, itinerary, and post-audit follow-up activities.

E. The review team members are to visit the sites assigned to them and use the foreign establishment audit checklist and the foreign establishment profile forms provided by the EO (Attachment 6).

F. At the end of each audit day, the review team is to meet with the CCA to compare its observations with those made by the CCA regarding:

1. The in-plant inspector’s verification that the establishment or facility is meeting the applicable requirements;

2. The inspection program’s ability to identify and resolve non-compliances; and

3. The need for enforcement action by the CCA.

G. At the audit’s conclusion and before the exit conference, review team members are to provide the EO with a written report of their findings and observations, including a preliminary assessment of whether CCA is implementing the written program submitted and an equivalent inspection system.

H. The EO is to enter these observations and analysis into the CAVF. The EO is to immediately notify the Director, IES, about any findings that constitute a food safety concern and that call into question the equivalence of the country’s inspection system. Under these circumstances, the IES Director is to collect the relevant audit evidence into a briefing for the appropriate senior Agency officials regarding the seriousness of the concern and recommendations for an agency response. A situation that justifies this type of action by the Director of IES would exist, for example, if a country had provided documentation to FSIS that evidenced its implementation of zero tolerance requirements for Listeria monocytogenes in Ready-to-Eat (RTE) product, but the EO could not verify that the requirements were in effect in any of the...
country’s certified export establishments. Likewise if the EO observed that post-mortem inspection was being conducted in certified establishments in a manner that is contrary to the approach that the CCA had described in the SRT and that had appeared to be equivalent, and the audited establishment produced adulterated product without a system-wide enforcement response from the CCA, the EO is to immediately consult with the IES Director regarding the elements of an FSIS response.

I. The EO is to prepare exit conference slides that outline the audit standards, scope, verification activities, and preliminary findings, including corrective actions taken by or required of the CCA. The exit slides also are to convey information on post-audit activity, specifically the steps involved with drafting, reviewing, and publishing the audit report, and the steps involved in a rulemaking associated with FSIS recognition of the equivalence of the country’s inspection system.

J. Before the exit conference, the EO is to hold a pre-exit conference call with the IES Director and the review team to review and approve of preliminary audit findings and the content of the exit slides.

K. At the conclusion of the pre-exit conference and at the direction of the IAS Director, the EO and review team are to present preliminary audit findings, including the updated slides, to the CCA at the exit conference. Within their exit slide presentation, the EO and review team are not to provide the CCA with an estimated timeline for completion of the draft audit report.

VI. EQUIVALENCE COMPONENT REVIEW

A. Upon return to the U.S., the EO is to work with the review team to review audit findings and determine whether the system met each equivalence component, taking into account the impact of audit findings on the CCA’s ability to meet FSIS food safety measures and related regulatory objectives.

B. The EO and the review team are to consider system design and execution as follows:

1. Related findings in different equivalence components. For example, significant findings under Component 4 (HACCP) may be aggravated by the lack of a well-defined training program (Component 1).

2. Evidence providing confidence in the country’s ability to export product that is safe, wholesome, and properly labeled and packaged. This evidence may include product testing conducted by the foreign government.

3. Other mitigating factors. For example, a country determined by the World Health Organization for Animal Health (OIE) and APHIS as having a negligible Bovine Spongiform Encephalopathy status would not need to undertake Specified Risk Materials removal because the SRMs would not be considered hazards based on the OIE designation.

C. The review team is to determine whether each equivalence component has been satisfied based on observations made during the on-site audit of the country’s ability or inability to meet the equivalence criteria on a consistent basis. Although the team may determine that a country does not meet a particular component, the team is to consider whether the CCA addressed findings through documented corrective actions that it submitted in response to the draft final audit report.

D. To assess the adequacy of corrective actions submitted by the CCA in response to audit findings, the EO and review team are to determine whether the proposed corrective action satisfies the EO’s original concerns:

1. For findings associated with written requirements, document review may be sufficient to determine that equivalence is achieved. For example, revision of a laboratory protocol in response to audit findings when FSIS did not identify overarching implementation concerns may be sufficiently verified through the document review process.
2. In general, findings associated with implementation of programs for any equivalence component will require an additional on-site audit to evaluate equivalence. However, in some cases FSIS may identify required revisions of written programs that may not require an additional on-site audit. For example, during the course of an on-site audit FSIS may identify required changes to laboratory procedures. A CCA's response to this finding may adequately correct the written program deficiencies and FSIS may determine this program is equivalent. If, however, findings are associated with the type and extent of CCA monitoring and verification of establishment food safety systems, the EO and review team are to evaluate the CCA's proposed corrective actions in terms of their potential to adequately verify process control; a determination that will require verification through direct, on-site observation.

VII. DRAFTING THE AUDIT REPORT

A. Within 60 business days of completing the initial equivalence audit, the EO, in collaboration with the review team, is to prepare a draft audit report and cover letter for review by the IES Director.

B. To draft the final audit report, the EO is to, with assistance from the review team:
   1. Obtain and analyze the CCA's comments on the draft audit report;
   2. Interact as needed with the CCA to obtain supplementary information;
   3. Update the SRT and CAVF; and
   4. If appropriate with the information at hand, make a tentative determination of equivalence within the audit report.

C. The audit report is to characterize the audit findings within the six equivalence components and include a preliminary recommendation for or against equivalence.

D. The IES Director is to clear the draft audit report and cover letter and send the package to the OPPD-AA for review and agency clearance.

E. After the draft audit report has cleared the agency, the EO is to send the draft audit report to the CCA for review and comment, and to inform the CCA that it has 60 calendar days to provide comments on the draft report.

NOTE: Corrective actions submitted by a CCA after the in-country audit has concluded cannot be included in the final audit report because the actions were not observed as part of the audit. They may, however, be published as an addendum to the final audit report and can be included as part of the administrative records associated with the equivalence rulemaking process.

F. The EO is to circulate a draft final audit report to the AAs for clearance within 20 calendar days.

G. The EO has 10 calendar days to incorporate comments from the clearance review into a final audit report and cover letter for concurrence by the IES Director and the Assistant Administrator, OPPD.

H. Following OPPD clearance, the EO is to clear the final report through the Agency.

I. Upon final Agency clearance, the IES Director is to prepare the cover letter and final audit report for delivery to the CCA by FAS post. This includes the electronic transmission of a scanned PDF copy of the audit report to the CCA and FAS post.
VIII. DRAFTING A PROPOSED AND FINAL RULE TO ADD A COUNTRY TO THE LIST OF EXPORT-ELIGIBLE COUNTRIES IN THE CODE OF FEDERAL REGULATIONS

A. The IES Director is to prepare a presentation and Decision Memorandum for the Administrator and Management Council summarizing the results of the logic-based demonstration of equivalence obtained during the in-country audit in Section V. (A) above. These results provide the rationale for country equivalence and are compiled and presented in the form of a decision memorandum that summarizes the equivalence review and describes how all issues from the SRT document review and systems related on-site audit findings were closed out. A recommendation for equivalence means the country’s SRT responses and any corrective actions submitted in response to audit findings were assessed by the review team and determined to meet the equivalence criteria as described in Section III. (G). This rationale for country equivalence is to provide the basis for the proposed rule. Once the Administrator concurs with the review team’s recommendation for equivalence, the reviewed SRT is uploaded to PHIS, and the final audit report and related communications between FSIS and the foreign CCA are sent to the country and posted to the FSIS website as described in Section VII.

B. Once the Administrator approves the equivalence determination as per VIII. A above, the EO is to work with the OPPD Issuances Staff (IS) to draft a proposed rule to add the country to the list of countries eligible to export meat, poultry, or egg products to the U.S and follow the process for developing, clearing and publishing proposed rules in the Federal Register.

C. The EO is to work with IS to review any comments that are received on the proposed rule. The EO is to consult subject matter experts from the initial review team to develop agency responses and then follow the process for developing, clearing, and publishing final rules in the Federal Register.

D. Before the publication of the final rule, the EO is to draft a letter of notification (see Attachment 7) for approval by the IES Director that advises the CCA of the publication of the final rule in the Federal Register, identifies the effective date of the final rule, and provides information on the next steps, labeling, and requirements for certifying establishments for export. The letter must emphasize that no product will be allowed entry into the U.S. until the final rule has been published.

E. The EO is to send the signed notification letter to the foreign country’s CCA through FAS.

F. In circumstances where a change of FSIS policy or regulation occurs after a proposed equivalence rule has been published but not yet finalized, the EO is to notify the CCA of the change in requirements and request that the CCA provide information regarding the manner in which the CCA’s inspection program will address and satisfy the new requirements. The EO is to assemble the review team to review the response received from the CCA and determine (in accordance with the criteria outlined in Section V. A above, whether sufficient information has been provided by the CCA to conduct a follow up audit to verify the effective implementation of the CCA’s additional measures. The EO is to notify the CCA in writing that the additional measures that the CCA identified in response to the change in FSIS requirements need to be verified by FSIS and submitted for public comment before a final equivalence rule can be issued, and that no product will be accepted until a final rule is published.

Refer questions through supervisory channels.

Assistant Administrator
Office of Policy and Program Development
M.V. Miguel Quevedo Valle  
Director General  
Direccion de Sanidad Animal  
Servicio Nacional de Sanidad Agraria  
Ministerio de Agricultura y Riego  
Av. La Molina 1915  
Lima, Peru  

Dear Dr. Valle:  

In response to your request of October 4, 2013, this letter represents the first step toward an initial equivalence determination for exporting meat products to the United States. As a condition of market access, countries wishing to export meat to the United States must be found by the U.S. Department of Agriculture’s (USDA) Food Safety and Inspection Service (FSIS) to have an inspection system equivalent to the United States’ domestic inspection system. To make this determination, FSIS will conduct a comprehensive review of Peru’s meat inspection system. This process will include a document review and an on-site audit – a process which, in our experience, can take several years to complete. FSIS will provide as much information and assistance as possible to facilitate your work. We look forward to the opportunity to work collegially with your government to expedite the review of Peru’s inspection system.

The enclosed attachment (CCA-SRT-2012), the Central Competent Authority (CCA) module, contains a document entitled, "Self-Reporting Tool for Foreign Country Initial Equivalence for Meat, Poultry and Egg Products (SRT)." The SRT is an inventory of questions about various aspects of Peru’s meat inspection system that FSIS will rely upon, in part, to make its equivalence determination. This document contains instructions for completing Section A (FSIS criteria) and Section B (FSIS Questionnaire). Please complete the SRT and provide responses to FSIS as soon as possible so that a formal review of Peru’s meat inspection program can begin.

General Requirements for Initial Equivalence  

The initial determination of equivalence by FSIS will begin with a review of your responses to questions in the CCA-SRT-2012, Section B. For each question, identify the specific reference(s) to the laws, regulations, or other implementing documents that support your response. Please note and follow the instructions in CCA-SRT-2012, Section B regarding how to reference and include documents that support your responses. To assist you in completing the SRT, we have included links to FSIS resources that are located in the CCA-SRT-2012, Section A. This section will serve as a guide to understanding FSIS’ regulatory objectives for items included in the SRT, and, for comparison purposes, provides information on FSIS’ own implementation protocols.
Document Review

When FSIS receives your responses to the SRT (CCA-SRT-2012), we will begin a technical review and will request additional information as needed.

On-Site Audit

Once FSIS completes its document review, we will request permission to conduct an on-site audit of Peru’s meat inspection system. The audit team will evaluate all aspects of Peru’s meat inspection system to verify through objective evidence that it is equivalent to the United States’ meat inspection system. This audit allows FSIS to observe the daily operation of Peru’s meat inspection system and to identify any areas that may require a more in-depth evaluation. After the on-site audit is completed, FSIS will make an equivalence determination based on its document review and the on-site audit results.

Determination of Equivalence

If Peru’s meat inspection system is found to be equivalent to the United States meat inspection system, FSIS will publish a proposed rule in the Federal Register to list Peru as eligible to export meat products to the United States. After the public has had 60 days to comment on this proposed rule, FSIS will review all of the public comments and publish a final rule in the Federal Register, along with responses to the public comments. The final rule will identify Peru as maintaining a meat inspection system that is equivalent to and assures the same level of public health protection as the U.S. system and, therefore, is eligible to export meat products into the U.S. market. At that time, your inspection service may certify Peruvian establishments to export meat products to the United States.

Animal Health Considerations

It is important to note that FSIS only determines the equivalence of a country’s meat inspection system. USDA’s Animal and Plant Health Inspection Service (APHIS) determines the specific types of animal products eligible to enter the United States based on the animal disease status of exporting countries. The following internet link will take you to the APHIS website where you can find the animal disease status for your country:


For specific information on APHIS requirements and disease restrictions applicable to your country, contact the National Center for Import and Export, Veterinary Services, APHIS, United States Department of Agriculture, 4700 River Road, Unit 40, Riverdale MD 20737-1231. We recommend that you work concurrently with both FSIS and APHIS to address each agency’s eligibility requirements for export to the United States.

I hope this information is helpful. Should you have any questions about the information contained in this letter and that you wish to discuss, I may be reached via telephone at
(202) 720-0082, via facsimile at (202) 720-7990, or via e-mail at FSIS-OPPD/IES@fsis.usda.gov.

Sincerely,

[Signature]

Andreas Keller  
Director  
International Equivalence Staff  
Office of Policy and Program Development  

Enclosure
PROJECT PLAN FOR INITIAL EQUIVALENCE
COUNTRY: [Orangeland]
PRODUCTS: [Meat]
PROJECT LEADER: [Jane Doe]

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<th>MAJOR COMPONENTS OF PROJECT</th>
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<tr>
<td>8. Draft minutes documenting document reviews as reviews are conducted</td>
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<tr>
<td>9. Identify any differences in the system (remember to include interviews conducted and documents gathered during any on-site assessment)</td>
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<td>10. Develop criteria to evaluate identified differences</td>
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<tr>
<td>11. Draft decision memorandum for Assistant Administrator based on document reviews</td>
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<td>12. Resolve equivalence issues with FSIS management</td>
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<tr>
<td>13. Determine if country is ready for on-site audit</td>
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</tbody>
</table>
### ON-SITE AUDIT

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<table>
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<tr>
<td>14.</td>
<td>Draft audit notification and audit plan</td>
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<tr>
<td>15.</td>
<td>Assemble audit team and begin preparation for on-site audit</td>
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<tr>
<td>16.</td>
<td>Conduct on-site audit</td>
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<td>17.</td>
<td>Hold pre-exit meeting</td>
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<tr>
<td>18.</td>
<td>Draft audit report</td>
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<tr>
<td>19.</td>
<td>Draft cover letter to country and send draft final audit report for comment</td>
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<tr>
<td>20.</td>
<td>Draft decision memorandum for Assistant Administrator based on document reviews and on-site audit results. (This decision memorandum must be signed by the Assistant Administrator prior to publication of the proposed rule.)</td>
</tr>
<tr>
<td>21.</td>
<td>Address comments from country on draft final report; prepare final report</td>
</tr>
<tr>
<td>22.</td>
<td>Draft cover letter and send final audit report to country</td>
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</table>

### Rulemaking

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<table>
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<tbody>
<tr>
<td>23.</td>
<td>Draft workplan and proposed rule</td>
</tr>
<tr>
<td>24.</td>
<td>Publication date of proposed rule</td>
</tr>
<tr>
<td>25.</td>
<td>Review all comments on proposed rule</td>
</tr>
<tr>
<td>26.</td>
<td>Draft workplan and final rule</td>
</tr>
</tbody>
</table>
| 27. | Publication date of final rule  
Effective date of final rule |
| 28. | Upon publication of final rule, draft letter to country advising of final rule and certification procedures |
COUNTRY/FAS CONTACTS:

PROJECT HISTORY:
DECISION MEMORANDUM

ISSUE:

Determination of Eligibility for the People’s Republic of China’s Poultry Slaughter Inspection System

BACKGROUND:

In May 2004, the People’s Republic of China (China) submitted a request for initial eligibility to export poultry and poultry products to the United States. A thorough review has been conducted of all poultry inspection documentation submitted by China in support of its application for equivalence. One on-site assessment of China’s poultry slaughter system and two on-site audits have been conducted by FSIS. The International Equivalence Staff of the Office of International Affairs has concluded that China’s poultry slaughter inspection system (1) meets all equivalence requirements of the Poultry Products Inspection Act as implemented by 9 CFR 381.196, (2) provides the same level of public health protection achieved by USDA, and (3) should therefore be eligible to export poultry and poultry products to the United States.

China is a large country located in East Asia. China has a population of approximately 1.3 billion people and is approximately 9,596,960 square kilometers in size. The capital city is Beijing. The official language is Standard Chinese or Mandarin.

The Chinese government is a unitary and "socialist state of the dictatorship of the proletariat," based on Marxism-Leninism-Mao Zedong Thought, led by the 46-million-member Chinese Communist Party (CCP). Political processes are guided by the party Constitution and state Constitution. The constitutions stress principles of democratic centralism, under which representative organs of both party and state are elected by lower bodies and they in turn elect their administrative arms at corresponding levels. Within representative and executive bodies, the minority must abide by decisions of the majority and lower bodies obey orders of higher level organs. In theory, the National Party Congress is the highest organ of power, but the real power lies in the Political Bureau of the CCP Central Committee and, still more, in the select Standing Committee of the Political Bureau. The
National People's Congress approves CCP policies and programs. The State Council is similar to the U.S. President's Cabinet.

China is divided into three tiers: thirty-two provincial-level units comprise twenty-three provinces, five autonomous regions, and four centrally governed special municipalities. The middle tier consists of autonomous prefectures, counties, autonomous counties, cities, and municipal districts. The basic level comprises townships and villages.

China's judicial system is a four-level court system: the Supreme People's Court in Beijing; higher people's courts in provinces, autonomous regions and special municipalities; the intermediate people's courts at the prefecture level and also in parts of provinces, autonomous regions, and special municipalities; and the basic people's courts in counties, towns, and municipal districts. The court system is paralleled by a hierarchy of prosecuting organs called people's procuratorates. At the apex stands the Supreme People's Procuratorate.

For the purposes of food safety inspection, the government agency in charge of the exportation of food products is the General Administration of Quality Supervision, Inspection and Quarantine of the People's Republic of China (AQSIQ). Within AQSIQ, the Import and Export Food Safety Bureau and the Certification and Accreditation Administration are in charge of government oversight for the import/export poultry establishments.

**EQUIVALENCE EVALUATION:**

China has requested an initial determination of eligibility to export poultry and poultry products to the United States. The inspection system documentation submitted by China indicates that its laws, regulations, and other issuances cumulatively provide the same level of public health protection attained by the United States. China has adopted the same sanitary measures applied by FSIS in its poultry inspection system except for three equivalence determinations. The first equivalence determination is for *Listeria monocytogenes* testing methodologies. The second is for *Salmonella* testing methodologies. And the third is for residue testing methodologies.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>U.S. Regulatory Requirement</th>
<th>China</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Listeria monocytogenes</em> Testing</td>
<td>The current FSIS protocols for <em>Listeria monocytogenes</em> testing of meat, poultry and egg products are found in the Microbiology Laboratory Guidebook, Chapter 8.04., Isolation and Identification of <em>Listeria monocytogenes</em> from Red Meat, Poultry, Egg and Environmental Samples.</td>
<td>METHOD:&lt;br&gt;ISO Method 11290-1&lt;br&gt;&lt;br&gt;EQUIVALENCE CRITERIA:&lt;br&gt;The criteria used for determining whether an alternative testing method for RTE products is equivalent are as follows:&lt;br&gt;- The method must use an enrichment step and detect less than one colony-forming unit per gram of <em>Listeria monocytogenes</em> in a 25 gram sample of RTE product.&lt;br&gt;- The method is a scientifically</td>
</tr>
</tbody>
</table>
| **Salmonella Testing** | The current FSIS protocols for *Salmonella* testing of meat, poultry and egg products are found in the Microbiology Laboratory Guidebook, Chapter 4.03, Isolation and Identification of *Salmonella* from Meat, Poultry and Egg Products. | **METHOD:**
ISO method 6579:2002

**EQUIVALENCE CRITERION:**
The criterion used for determining whether an alternative testing method for RTE and carcass samples is equivalent is as follows:

- The method is a scientifically validated method of analysis for *Salmonella* approved or adopted by an international organization.

**EVALUATION:**
FSIS has concluded that ISO method 6579:2002 is a scientifically validated method of analysis for detecting *Salmonella* that is approved by an international organization.

| **Residue Testing** | The current FSIS protocols for residue testing of meat, poultry and egg products are found in the Chemistry Laboratory Guidebook. | **METHODS:**
1. Chloramphenicol ELISA Method
2. Streptomycin ELISA Method
3. Streptomycin LC/FID Method
4. Fluoroquinolones LC/DAD/FID Method
5. Fluoroquinolones LC/MS2 Method
6. Phenicols Method
7. Clenbuterol, Salbutamol GC/MS Method

**EVALUATION:**
A validated method of analysis for *Listeria monocytogenes* approved or adopted by an internationally recognized organization.

**EVALUATION:**
FSIS has concluded that ISO 11290-1 is a scientifically validated method of analysis for detecting *Lm* that is approved by an international organization and uses an enrichment step and detects less than one colony-forming unit per gram of *Lm* in a 25 gram sample of RTE product.
8. Organochlorine Pesticides Method
9. PCBs GC/HRMS Method
10. Sulfonamides HPLC Method
11. Penicillins LC/MS/MS Method
12. Tetracyclines HPLC-DAD Method
13. Benzylpenicillin, Cloxacillin, Dicloxacillin HPLC Screen Method
14. Nitroimidazoles HPLC Method
15. Nitrofurans LC/MS/MS Method
16. Neomycin CHARM Method
17. Neomycin LC/MS Method

**EQUVALENCE CRITERIA:**

The criteria used for making equivalence decisions for determining whether use of a different analytical method for residue testing is equivalent are as follows:

- The method measures the correct target analyte in the tissue as defined by FDA in 21 CFR 556 for animal drugs, 21 CFR 172.140 for food additives, 21 CFR 109.30 for unavoidable contaminants, and EPA in 40 CFR 180 for pesticides.

- For those compounds for which a tolerance or action level has been established, the method detects the chemical residue at one-half the tolerance or action level or less.

- For banned compounds, the method used detects the chemical residue at a level comparable to the limit of detection of the FSIS method.

**EVALUATION:**

FSIS has concluded that China uses an analytical method that measures the correct chemical residue in the appropriate tissue as defined by FDA in 21 CFR 556 for animal drugs, 21 CFR 172.140 for food additives, 21 CFR 109.30 for unavoidable contaminants, and EPA in 40 CFR 180 for pesticides.
For those compounds for which a tolerance or action level has been established, the method detects the chemical residue at one-half the tolerance or action level or less.

For banned compounds, the method used detects the chemical residue at a level comparable to the limit of detection of the FSIS method.

China has requested an initial determination of equivalence of its poultry slaughter inspection system. The inspection system documentation submitted by China demonstrates that its laws, regulations, and other issuances cumulatively provide the same level of public health protection attained by the United States.

In May 2004, December 2004 and July 2005, a team of five FSIS subject matter experts conducted onsite audits of China’s poultry slaughter inspection system. The audit results confirmed that China has implemented all sanitary measures described in its poultry slaughter inspection system documentation.

Even if China is listed in FSIS regulations as eligible to export poultry and poultry products, products must also comply with other U.S. requirements, including restrictions under Title 9, Part 94 of the Animal and Plant Health Inspection Service’s (APHIS) regulations (9 CFR 94) relating to the importation of poultry and poultry products from foreign countries into the United States.

APHIS has classified China as a country affected with Highly Pathogenic Avian Influenza subtype H5N1. Adding China to the FSIS list of countries eligible to export processed poultry products to the United States under 9 CFR 381.196 does not change the fact that no fresh, frozen or chilled poultry and poultry products may enter the United States from China due to the presence of HPAI.

**EQUIVALENCE CRITERIA:**

The central criteria for equivalence of an alternative poultry slaughter inspection program are as follows:

1. Does the program meet all USDA requirements for the import of poultry and poultry products to the United States?

2. Does the program afford American consumers the same level of public health protection provided by the USDA domestic poultry inspection system?

These criteria are addressed in the following summary of analyses conducted.
<table>
<thead>
<tr>
<th><strong>Criteria</strong></th>
<th><strong>U.S. Regulatory Requirement</strong></th>
<th><strong>China</strong></th>
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<tr>
<td></td>
<td>Organizational structure and staffing, so as to insure uniform enforcement of the requisite laws and regulations in all establishments throughout the system at which products are prepared for export to the United States.</td>
<td>The Chinese poultry inspection system is centralized in the national government. The central competent authority is AQSIQ. AQSIQ is a law-enforcement administrative part of the State Council in the field of entry-exit commodities inspection, entry-exit health quarantine, entry-exit animal and plant quarantine, certification and accreditation and standardization. AQSIQ has 35 Provincial bureaus which are responsible for entry-exit quarantine and quality inspection of animals and animal products, issuing health certificates and control of food processing plants producing products for export. Within AQSIQ there are two responsible sections for food safety: 1. Entry-Exit Food Safety Bureau (FSB). The FSB executes the supervision and implementation of the food safety regulations in China. 2. Certification and Accreditation Administration (CNCA), CNCA is authorized to exercise administrative responsibilities by undertaking unified management, supervision and overall coordination of certification and accreditation activities throughout China. Ministry of Agriculture (MoA), Bureau of Animal Production and Health is responsible for animal health and veterinary public health in China. Its scope of responsibility includes animal disease prevention and diagnosis, epidemic control and notification, veterinary drug management, residue control, and quarantine of livestock and poultry and their products. Finally, Ministry of Health (MoH) is compromised of health supervision centers, health administrative departments and China’s Center for Disease Control (CDC). The health supervision centers are administrative, executive bodies, while China’s CDC is responsible for technical support. The MoH plays a crucial role in the food safety arena. MoH is responsible for drafting regulations and standards related to the hygienic code of practice of food manufacturing.</td>
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<td></td>
<td>Ultimate control and supervision by the national government over the official activities of all employees or licensees of the system.</td>
<td>The Law of the People's Republic of China on Import and Export Commodity Inspection provides ultimate control and supervision by the national government over the official activities of all employees or licensees of the system.</td>
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<tr>
<td>Requirement</td>
<td>Responsibility</td>
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<td>-----------------------------------------------------------------------------</td>
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<tr>
<td>The assignment of competent, qualified inspectors.</td>
<td>CNCA is responsible for the assignment of competent, qualified inspectors.</td>
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<tr>
<td>Adequate administrative and technical support.</td>
<td>AQSIQ has adequate administrative and technical support to support its inspection system, including laboratory functions.</td>
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<tr>
<td>The inspection, sanitation, quality, species verification, and residue standards applied to products produced in the United States.</td>
<td>AQSIQ has adopted the FSIS regulatory requirements with the exception of the <em>Listeria monocytogenes</em>, <em>Salmonella</em>, and residue testing methodologies.</td>
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<tr>
<td>Ante-mortem inspection of animals for slaughter and inspection of methods of slaughter and handling in connection with slaughtering which shall be performed by veterinarians or by other employees or licensees of the system under the direct supervision of the veterinarians.</td>
<td>CNCA is responsible for the assignment of competent, qualified inspectors. Veterinarians from CNCA are responsible for the ante-mortem inspection of animals.</td>
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<tr>
<td>Post-mortem inspection of carcasses and parts thereof at time of slaughter, performed by veterinarians or other employees or licensees of the system under the direct supervision of the veterinarians.</td>
<td>CNCA is responsible for the assignment of competent, qualified inspectors. Veterinarians from CNCA are responsible for the post-mortem inspection of animals.</td>
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<td>Official controls by the national government over establishment, construction, facilities and, equipment.</td>
<td>AQSIQ has official controls by the national government over establishment construction, facilities and, equipment.</td>
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<tr>
<td>Direct and continuous <em>(daily)</em> official supervision of slaughtering and preparation of product, by the assignment of inspectors to establishments to assure that adulterated or misbranded product is not prepared for export to the United States.</td>
<td>AQSIQ is responsible for ensuring direct and continuous <em>(daily)</em> official supervision of slaughtering and preparation of product, by the assignment of inspectors to establishments to assure that adulterated or misbranded product is not prepared for export to the United States.</td>
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<td>Periodic supervisory visits by a representative of the foreign inspection system not less frequent than one such visit per month to each certified establishment.</td>
<td>AQSIQ requires monthly supervisory reviews of establishments proposed for certification.</td>
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<td>Each official establishment must be operated in a manner sufficient to prevent the creation of insanitary conditions and to ensure that product is not adulterated.</td>
<td>AQSIQ has 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.</td>
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<td>Each official establishment shall develop, implement and maintain written standard operating procedures for sanitation.</td>
<td>AQSIQ has 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 and practices, and good product handling and storage practices.</td>
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<td>Each official establishment shall develop, implement and maintain a HACCP plan.</td>
<td>AQSIQ has controls in place that require establishments proposed for certification to have developed and adequately implemented a HACCP program.</td>
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<tr>
<td>A National Residue Plan that provides a variety of sampling strategies to prevent violative residues from entering the food supply and develops national data on the occurrence of chemical residues to</td>
<td>AQSIQ, in cooperation with MoA, ensure that the National Residue Plan provides a sampling regimen to prevent violative residues from entering the food supply.</td>
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</table>
RECOMMENDATION:
China’s poultry slaughter inspection system should be found equivalent to the FSIS system and a rule should be proposed to add China as eligible to export slaughtered poultry products to the United States.

DECISION CONFIRMATION AND APPROVAL:

Sally White
Director
International Equivalence Staff
Office of International Affairs, FSIS

Karen Stuck
Assistant Administrator
Office of International Affairs, FSIS
Dr. Kiyoon Chang  
Chief Veterinary Officer  
Labeling and Quarantine Inspection Division  
Ministry for Food, Agriculture, Forestry and Fisheries  
88, Gwannum-Ro, Gwacheon-city  
Gyeonggi-do, 427-719  
Republic of Korea

Dear Dr. Chang:

The Food Safety and Inspection Service (FSIS) has completed its review and analysis of the Republic of Korea’s (Korea) submitted information for seeking initial equivalence for the export of poultry and poultry products to the United States. FSIS now proposes to move forward in the equivalence process by conducting an on-site audit of Korea’s poultry products inspection system to verify that Korea has effectively implemented the FSIS requirements for poultry products.

Please find enclosed a list of the components of Korea’s poultry inspection system that FSIS will audit, as well as a proposed audit plan. The purpose of the audit plan is to give you notice of the audit dates. Please note that the audit plan only provides a brief overview of the auditor’s itinerary. A complete itinerary will be forwarded to you prior to the start of the audit.

FSIS proposes to conduct this audit beginning on November 15, 2010. The audit will cover Korea’s poultry slaughter and poultry processing inspection systems. To expedite the scheduling of the audit, please provide the following information as soon as possible:

1. A list of the government offices (central, regional, and local) that would provide regulatory oversight of the establishments to be certified by Korea for export to the United States and laboratories that would support these certified establishments.

2. A list of poultry establishments that are determined by the Korean government as fully meeting the FSIS requirements for exporting poultry products to the United States. This would include both poultry slaughter establishments and poultry processing establishments.

3. A list of the microbiology and residue laboratories that would test poultry products destined for the United States.
Upon conclusion of the on-site audit, FSIS will draft an audit report and will provide it to Korea for comments. Once FSIS receives Korea’s response to the report and all outstanding issues have been resolved, FSIS will publish a proposed rule in the U.S. Federal Register recommending that Korea be added to the list of countries eligible to export poultry products to the United States. Following a comment period, FSIS will analyze and respond to comments received and will then make a final decision about the system equivalence of Korea’s poultry inspection system and will publish a final rule in the Federal Register announcing Korea’s eligibility.

If you have any questions, please contact me at telephone number 202-720-6400, facsimile number 202-720-7990, or by e-mail at internationalequivalence@fsis.usda.gov.

Sincerely,

Andreas Keller
Director
International Equivalence Staff
Office of International Affairs

Enclosure
Dr. Kiyoon Chang

Enclosure

The FSIS on-site audit will focus, but is not limited to, the following aspects of Korea’s poultry inspection system:

1. The inspection system must be organized and staffed so as to assure uniform enforcement of the laws and regulations governing meat and poultry inspection in all official establishments at which products are prepared for export to the United States.

   - The Central Competent Authority (CCA) maintains a single standard of laws and regulations applicable to all establishments certified for export to the United States.

   - The CCA has an ongoing plan to continuously analyze and implement staffing requirements to ensure the production of safe, wholesome, and accurately labeled product in certified plants.

2. The CCA ensures that all inspection personnel or licenses are paid by the government. The inspection system must have ultimate control and supervision over the official activities of all employees or licensees of the system.

   - The national inspection system has the legal authority and responsibility to certify and de-certify establishments for export to the United States.

   - The national inspection system has the legal authority and responsibility to approve and disapprove laboratories conducting analytical testing on products for export to the United States.

   - Inspection activities and personnel conducting such activities are under the direct authority of a government agency.

3. The inspection system must have competent, qualified inspectors assigned to official establishments that will export products to the United States.

   - The CCA ensures that inspection personnel have appropriate educational credentials, and appropriate training and experience to carry out their inspection tasks.
     - A veterinary medical officer must have a Doctor of Veterinary Medicine or equivalent degree, e.g., Veterinary Medical Doctor, obtained at a school or college of veterinary medicine accredited by a known, established veterinary medical association council on education.
     - Food inspectors must have specialized experience or education sufficient to perform the assigned duties.

4. The CCA has the ability to provide specialized, ongoing training of its inspection personnel assigned to certified establishments in specific US import requirements, such as Pathogen Reduction requirements, Hazard Analysis and Critical Control Point system requirements, sanitation requirements, slaughter requirements, and enforcement of US import requirements.
5. The inspection system must have the authority and responsibility to enforce the laws and regulations governing meat and poultry inspection, and to certify products for export.

- The CCA has the legal authority and associated responsibility to ensure that adulterated or misbranded product is not prepared for export to the United States.

6. The inspection system must have adequate administrative and technical support to operate the inspection system. This support includes administrative support personnel and laboratory operations.

- The CCA maintains a communication system to convey US inspection requirements throughout its inspection system in a timely manner.

- The CCA ensures that laboratories testing product destined for the United States comply with the general criteria for testing laboratories provided in ISO/IEC Guide 17025.

- The CCA ensures that methods of analysis have been scientifically validated and have been approved or adopted by an international organization.

- The CCA ensures that laboratories analyzing product destined for the United States participate in appropriate proficiency testing schemes for food analysis.

7. The inspection system must provide the same or equivalent standards that are applied to products produced in the United States (sanitation, quality, and residue standards).

- The inspection system must require ante-mortem inspection of animals for slaughter. Ante-mortem inspection must be performed by veterinarians or by other employees or licensees of the system, under the direct supervision of the veterinarians.

8. The inspection system must require post-mortem inspection and further processing of carcasses and parts at the time of slaughter.

9. The inspection system must have official controls over establishment construction, facilities, and equipment.

10. The inspection system must provide for direct and continuous (daily) official supervision of slaughter activities and preparation of products.

11. The inspection system must provide for periodic supervisory visits by a representative of the inspection system to each certified establishment.

12. The inspection system must provide official controls over condemned material until destroyed or removed.
13. The inspection system must require complete separation of establishments that are certified from those that are not certified.

The inspection system must require that each official establishment operate in a manner to prevent insanitary conditions.

15. Sanitation Standard Operating Procedures (SSOP):
The inspection system must require that each official establishment develop, implement and maintain written standard operating procedures for sanitation.

16. The inspection system must require that each official establishment develop, implement and maintain a HACCP plan.

17. The inspection system must have a chemical residue control program, organized and administered by the national government, which includes random sampling of internal organs and fat of carcasses for chemical residues identified by the exporting country’s meat and poultry inspection authorities or by FSIS as potential contaminants.

18. The inspection system must provide for a sampling and testing program for generic E. coli in raw product.

19. The inspection system must provide for a sampling and testing program for Salmonella in raw product.

20. The inspection system must provide for control of Listeria monocytogenes and Salmonella in ready-to-eat (RTE) poultry.
United States Department of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue
Washington, D.C. 20250

Audit Plan

1. **Country audited.** Republic of Korea

2. **Audit Objective, Scope, and Methodology.** The Food Safety and Inspection Service (FSIS) proposes to audit the poultry inspection system of the Republic of Korea. The scope of this initial equivalence audit will include all aspects of the inspection system for regulating establishments that will be certified as eligible to export poultry products to the United States.

   Special emphases will focus on corrective actions proffered and implemented by the Central Competent Authority (CCA) in response to the previous FSIS audit, which was conducted from October 6-17, 2008.

   The audit standards will include all applicable legislation originally determined by FSIS as equivalent as part of the initial review process.

   Determinations concerning program effectiveness will focus on performance within the following six equivalence components upon which system equivalence is based: (1) Government oversight, (2) Statutory authority and food safety regulations, (3) Sanitation, (4) Hazard Analysis and Critical Control Point Systems, (5) Chemical residues, and (6) Microbiological testing programs.

   Administrative functions will be reviewed at the CCA’s headquarters, state offices, and local inspection offices. FSIS will evaluate the implementation of those administrative functions in place, which ensure that the national system of inspection, verification, and enforcement is being implemented as intended.

   During the establishment visits, particular attention will be paid to the extent to which industry and government interact to control hazards and prevent non-compliances that threaten food safety, with an emphasis on Korea’s ability to provide oversight through supervisory reviews conducted in accordance with 9 CFR 381.196.

   Laboratory audits will be conducted to verify their ability to provide adequate technical support to the inspection system.

3. **Date and place.** The FSIS system audit will commence on November 15, 2010 with an opening meeting in Seoul, Korea and will conclude on November 26, 2010 with a closing meeting in Seoul.

4. **Timetable.** FSIS will conduct on-site audit activities pursuant to the itinerary presented in this plan. A draft report of this audit will be furnished to the auditee on or about 60 days from
the date of the closing meeting. The auditee may submit comments to the draft audit report. Comments are due to FSIS 60 days from the date the draft audit report is transmitted. FSIS will then issue a final report that incorporates, as appropriate, comments from the auditee. The final audit report will be posted on the FSIS Internet web site.

5. **Language.** This audit will be conducted in English. The audit report will be written in English. Auditee comments should be submitted in English to avoid misunderstandings that may arise from translation in the United States.

6. **Audit Members.**
Ms. Olga Morales, Senior Equivalence Officer, Office of International Affairs
Dr. Nader Memarian, Senior Program Auditor, Office of International Affairs
Mr. Victor Cook, Chief, Microbiological Issues Branch, Office of Public Health Science
Mrs. Margaret O’Keefe, Chemist, Risk Assessment Division, Office of Public Health Science

7. **Itinerary.** Details of the audit itinerary, including the actual number of government offices, establishments, and laboratories to be visited, will be coordinated with your country’s inspection officials and the U.S. Embassy in Seoul.

8. **Confidentiality.** The FSIS auditors will respect commercial confidentiality and avoid conflicts of interest.

9. **Gifts and gratuities.** All FSIS personnel are barred by United States federal law from accepting any form of gift or gratuity from any source in the course of their official duties.

This prohibition includes meals and drinks, even if offered in the course of an official function. In such situations, FSIS employees are required to either refuse food and drink or make payment to the host in an amount equal to the value received. Consequently, we request assistance from the inspection service in either avoiding instances wherein the FSIS auditors may be placed in a difficult situation or arranging payment with the host beforehand. An exception to this rule is the exchange of customary social courtesies (such as a cup of coffee or soft drink) which are wholly free of any improper implications and are of trivial value.

Agency policy is that no “hospitality” gifts or mementos of any kind may be accepted by FSIS employees.
The audit plan for both EU and non-EU countries is drafted by the auditor and sent by IAS/IES management to the head of the inspection system in the country, at least **60 days** before the audit is scheduled to begin.

<table>
<thead>
<tr>
<th>Preliminary Research</th>
<th>Development of Audit Plan</th>
<th>Administrative Preparations</th>
<th>Documents</th>
<th>Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>45 Days Prior to Entrance Meeting</strong></td>
<td><strong>45 Days Prior to Entrance Meeting</strong></td>
<td><strong>30 Days Prior to Entrance Meeting</strong></td>
<td><strong>15 Days Prior to Entrance Meeting</strong></td>
<td><strong>15 Days Prior to Entrance Meeting</strong></td>
</tr>
<tr>
<td>Complete SRT and CAVF (approved by OIA and IPD)</td>
<td>- Pre-entrance meeting with IES/IPD</td>
<td>- Identify mandatory follow-up</td>
<td>- Attendance sheets for entrance/exit conferences</td>
<td>- Loaner equipment in working condition (Computer, Blackberry, etc.)</td>
</tr>
<tr>
<td>Review the last two FSIS audit reports</td>
<td>- Set date / time for pre-exit with Policy</td>
<td>- Identify country holidays</td>
<td>- Forms (est. checklists, profiles, lab, 3-day update, etc.)</td>
<td>- USB memory sticks</td>
</tr>
<tr>
<td>Talk to previous auditor(s)</td>
<td>- Prepare briefing paper/decision memo</td>
<td></td>
<td>- Copy of relevant FSIS documents (new directives, etc.)</td>
<td>- WorldCom “POPs” for the country</td>
</tr>
<tr>
<td>Review a third party audit last report (EC, Canada, etc.)</td>
<td>- Submit Gov Trip and AD-202 to OAA for Administrator signature/approval</td>
<td></td>
<td>- EC Directives</td>
<td>- Business Cards</td>
</tr>
<tr>
<td>Review IID/POE violation issues</td>
<td>- Follow-up on Administrator signature/approval</td>
<td></td>
<td>- Copies of passport, country clearance, and other documents</td>
<td>- Other</td>
</tr>
<tr>
<td>Review country’s residue monitoring plan with IES staff</td>
<td>- Submit audit itinerary to the country</td>
<td></td>
<td>- Prepare entrance slides</td>
<td>- Other</td>
</tr>
<tr>
<td>Other</td>
<td></td>
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</tbody>
</table>

**Notes:**
# Foreign Establishment Audit Checklist

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

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

61. NAME OF AUDITOR

62. AUDITOR SIGNATURE AND DATE
United States Department of Agriculture  
Food Safety and Inspection Service  

Foreign Establishment Profile

Part A - General Information

1. ESTABLISHMENT NAME AND LOCATION

2. DATE

3. ESTABLISHMENT NO.

4. NAME OF COUNTRY

Part B - Establishment Operation

5. TYPE OF OPERATION (check all that apply):

- Slaughter
- Freezer/Cold Store
- Processing

6. SIZE OF ESTABLISHMENT (per HACCP criteria):

- Large
- Very Small
- Small

7. NUMBER OF ESTABLISHMENT EMPLOYEES

Part C - Processes/Products

8. SLAUGHTER

- Young Chickens
- Porcine
- Ovine
- Caprine
- Ducks
- Geese
- Guinea
- Mature Chickens
- Equine
- Calves
- Turkeys
- Bovine
- Ratites
- Other

9. OTHER PRODUCT CATEGORIES

- Raw Meat (Ground)
- Raw Meat (Not Ground)
- Thermally Processed/Commercially Sterile
- Not Heat-Treated (Shelf Stable)
- Heat-Treated (Shelf Stable)
- Product with Secondary Inhibitors (Not Shelf Stable)
- Fully Cooked (Not Shelf Stable)
- Egg Product
- Heat-Treated (Not Fully Cooked/Not Shelf Stable)

10. SOURCE OF MEAT, POULTRY OR EGG PRODUCTS

<table>
<thead>
<tr>
<th>SPECIES</th>
<th>COUNTRY OF ORIGIN</th>
<th>ESTABLISHMENT NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>

Part D - Remarks (Use additional sheets of paper if necessary)

Current Export Status:

- [A]ctive US Export
- [I]ndirect US Export
- [D]omestic Market Only
- [N]ot Approved for US Export, but slaughtering

See Attached Sheets for Additional Information

11. NAME OF AUDITOR

12. AUDITOR SIGNATURE AND DATE

FSIS 5000-7 (04/04/2002)
### Schedule of Operations:

| # of Shifts | Shift 1 | | Shift 2 | | Shift 3 | |
|-------------|---------| |---------| |---------| |
|             | Hours   | Days | Hours   | Days | Hours   | Days |
| Slaughter   |         |      |         |      |         |      |
| Processing / Cold storage |         |      |         |      |         |      |

### Staffing Information:

<table>
<thead>
<tr>
<th># Veterinarians:</th>
<th># Non-Veterinarians:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Other Staffing Info:</th>
<th>Accompanying Personnel:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Additional Production Information:

- **Slaughter volume (per week):**
- **Slaughter line speed (per hr):**
- **Humane Handling & Slaughter:** This operation is slaughtering animals which are covered under the Humane Methods of Slaughter Act. Specific information can be found in a subsequent portion of this document.

<table>
<thead>
<tr>
<th>Total Production Volume (US Export):</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTE Info:</td>
</tr>
<tr>
<td>Post-Lethality Exposed?</td>
</tr>
<tr>
<td>Alternative Used to Control Post-Contamination w/ Lam:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Other Details:</th>
<th></th>
</tr>
</thead>
</table>

### Sources:

<table>
<thead>
<tr>
<th>Species</th>
<th>Country</th>
<th>Est #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

### Exports:

<table>
<thead>
<tr>
<th>Species</th>
<th>Country</th>
<th>Est #</th>
<th>Description</th>
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<tbody>
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</tbody>
</table>
Humane Handling & Slaughter Information

STUNNING METHOD (Check all that apply):
- Electrical: Head Only
- Electrical: Head/Thorax
- Controlled atmosphere
- Firearm: rifle/shotgun
- Firearm: pistol
- Captive-bolt: pneumatic
- Captive-bolt: hand-held
- None: Ritual Slaughter

SYSTEMATIC APPROACH (Federal Register Notice dated September 9, 2004 — “Systematic Approach to Humane Handling and Slaughter”):

Does the establishment use a proactive systematic approach to humane handling, perform audits, and record their findings?
- No
- Yes

If Yes, check-off items below that have been implemented; numbers correspond to the four steps of the Systematic Approach.

1. Initial Assessment
2. Facilities design minimizes excitement/discomfort
3. Periodic evaluations performed
4. Handling practices modified when necessary

Regulatory authority and requirements:

Markets for ritual slaughter:

Description of humane handling and slaughter procedures in regard to ritual slaughter:

Check all categories below that are relevant to your observation.

- Inclement Weather
- Ante-mortem
- Slips/Falls
- Truck unloading
- Suspect/Disabled
- Stunning Effectiveness
- Water/Feed
- Prod Use
- Return to Consciousness
- Facilities

15. OBSERVATIONS:

Error! AutoText entry not defined.
<table>
<thead>
<tr>
<th>Establishment</th>
<th>Deli Products</th>
<th>Other Than Deli Products</th>
</tr>
</thead>
<tbody>
<tr>
<td>Establishment uses a post-lethality treatment and an antimicrobial agent/process.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Annual Production Volume (actual lbs/kggs):</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Validated log reduction of <em>Listeria monocytogenes (Lm)</em> by the establishment’s post-lethality treatment.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Log (s) Reduction:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B. Validated or highest increase in <em>Lm</em> allowed by the establishment’s antimicrobial agent or process.</td>
<td></td>
<td></td>
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<tr>
<td>Log (s) Increase:</td>
<td></td>
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<tr>
<td>C. Frequency of testing of food-contact surfaces per line each year.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Testing Frequency:</td>
<td></td>
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<tr>
<td>Alternative 2: Establishment uses either a post lethality treatment OR an antimicrobial agent/ process.</td>
<td></td>
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<tr>
<td>Annual Production Volume (actual lbs/kggs):</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Validated log reduction of <em>Lm</em> by the establishment’s post-lethality treatment:</td>
<td></td>
<td></td>
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<tr>
<td>Log (s) Reduction</td>
<td></td>
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<tr>
<td>B. Validated or highest increase in <em>Lm</em> allowed by your antimicrobial agent or process</td>
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<tr>
<td>Log (s) Increase</td>
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<tr>
<td>C. Frequency of testing of food-contact surfaces per line each year for Alternative 2</td>
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<tr>
<td>Testing Frequency</td>
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<tr>
<td>Alternative 3 Establishment relies exclusively on the SSOP.</td>
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<tr>
<td>Annual Production Volume (actual lbs/kggs):</td>
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<tr>
<td>A. Frequency of testing of food-contact surfaces per line each year</td>
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<tr>
<td>Testing Frequency</td>
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</tbody>
</table>

*Error! AutoText entry not defined.*
Dear Dr. Chang:

I am happy to notify you that on March 26, 2014, the Food Safety and Inspection Service (FSIS) published a final rule that listed Republic of Korea (Korea) as eligible to export poultry products to the United States. The following link will take you to the text of Korea final rule: https://www.federalregister.gov/articles/2014/03/26/2014-06652/eligibility-of-the-republic-of-korea-to-export-poultry-products-to-the-united-states#h-9. FSIS appreciated your collaboration, cooperation, and patience extended during the equivalence determination process. FSIS remains committed to continue working with you on the next steps.

The purpose of this letter is to provide information about the next steps regarding FSIS’ requirements on (1) import inspection, (2) labeling, and (3) alternative sanitary measure.

**Import Inspection Requirements**

The United States poultry product inspection regulations, 9 Code of Federal Regulations (CFR) 381.196 (a) (3) require that Korea to conduct annual certification of establishments to verify that official establishments fully meet the requirements of 9 CFR 381.196(a) (2) (i) and (ii). Annual certifications are necessary for establishments to maintain their eligibility for exports to the United States. Certification of official establishments by Korea inspection officials shall be in the format specified in 9 CFR 381.196(a) (3). In addition, 9 CFR 381.197 require that poultry products consigned to the United States must be accompanied with foreign inspection certificates. The foreign certificates must be prepared according to the format specified in 9 CFR 381.197. The following link will take you to 9 CFR 381.196 and 197: [http://www.gpo.gov/fdsys/pkg/CFR-2012-title9-vol2/pdf/CFR-2012-title9-vol2-sec381-196.pdf](http://www.gpo.gov/fdsys/pkg/CFR-2012-title9-vol2/pdf/CFR-2012-title9-vol2-sec381-196.pdf). For more details relating to import inspection requirements, please contact Dr. Regina Tan, Director, Recall Management and Technical Analysis Staff by telephone at 202-690-1975, or by electronic mail at Regina.Tan@fsis.usda.gov

**Labeling Requirements**

All poultry products entering into the United States must bear labeling that meets FSIS requirements. The labels intended to be used by the certified establishments will need to be approved by the FSIS, Labeling and Program Delivery Staff (LPDS) prior to their use on poultry products intended for export to the United States. The LPDS is responsible for ensuring that the label intended for use on the product includes accurate product identification and claims, net weight, species identification, and nutritional information to the specific
poultry products. For further information on FSIS labeling requirements and policies, please refer to our Labeling Guidance webpage at:


http://www.fsis.usda.gov/regulations_&_policies/Mandatory_Label_Features/index.asp


http://www.fsis.usda.gov/regulations_&_policies/Labeling_Situations_Temporary_Approval/index.asp

For details about labeling and food additives requirements and policies, please contact Ms. Rosalyn Murphy-Jenkins, Director, Labeling and Program Delivery Staff by telephone at 301-504-0879 or by electronic mail at Rosalyn.murphy@fsis.usda.gov

Alternative Sanitary Measure
Korea’s poultry inspection system has been found equivalent to FSIS’ poultry inspection system. Therefore, Korea is eligible to export poultry products processed with a thorough lethality treatment to result in ready-to-eat product, such as (1) Jeukseok Samgyetang (instant ginseng chicken stew), and (2) Gohyang Samgyetang (hometown ginseng chicken stew) to the U.S. These types of processed poultry products fall under following FSIS processing categories: thermally processed—commercial sterile; fully cooked—not shelf stable. FSIS expects Korea to continue maintain equivalence of its poultry inspection system as presently designed. Please be advised that Korea needs to notify FSIS and request for equivalence determination before any changes (alternative sanitary measure) in its poultry inspection system that may affect the original determination of equivalence is implemented. For any questions regarding alternative sanitary measure, please contact Dr. Andreas Keller, Director, International Equivalence Staff by telephone at 202-720-0082 or by electronic mail at internationalequivalence@fsis.usda.gov

I look forward to hearing from you and working with you and your inspection service as we complete the FSIS initial equivalence process for Korea’s poultry inspection system. We offer our availability for a teleconference so that we may further assist you in this final process. If you feel that this is proposal would be of benefit, please us know, and we will work to set a mutually agreeable time for a teleconference.

If you have any questions, please contact Mr. AJ Ogundipe at (202)-205-3819 or by electronic mail at aj.ogundipe@fsis.usda.gov or internationalequivalence@fsis.usda.gov

Sincerely,

Rachel Edelstein
Assistant Administrator
Office of Policy and Program Development
CC: LIST FOR LETTERS
Kevin N. Smith, Minister-Counselor, US Embassy, Seoul
Stephen Wixom, Senior Agricultural Attaché, US Embassy, Seoul
SM Heo, Veterinary Attaché, Embassy of Korea
Susan Phillips, FAS North Asia Area Director
Yousef Shireen, FAS
Alfred Almanza, Administrator, FSIS
Carmen Rottenberg, Chief of Staff, OA, FSIS
Daniel Engeljohn, Assistant Administrator, OFO
Rachel Edelstein, Assistant Administrator, OPPD
William C. Smith, Assistant Administrator, OIEA
Tohamy Soumaya, Deputy Assistant Administrator, OPPD
Ronald Jones, Deputy Assistant Administrator, OFO
Vincent Fayne, Acting Deputy Assistant Administrator, OIEA
Mary Stanley, Director, IRSPS, OPPD
Carolyn Shore, EB, State Department
Rick Harries, Director, IECPDS, OPPD
Andreas Keller, Director, IES, OPPD
Regina Tan, RMTAS, OFO
Shaukat Syed, Director, IAS, MCAD, OIEA
Juan Rodriguez, IAS, OIEA
AJ Ogundipe, IES, OPPD
Catherine Fulton, OASA, FAS
Korea Country File

FSIS: Korea _4/2/14_Chang_IES_Post final rule letter -Ltr_AJ_AKeller _REdelstein