



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

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

Dear Dr. Związek:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Poland's meat inspection system June 4 through July 3, 2008. Comments from the government of Poland have been included as an attachment to the final report. Enclosed is a copy of the final audit report. We apologize for the delay in the submission of this report

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 205-3873, by facsimile at (202) 720-0676, or electronic mail at manzoor.chaudry@fsis.usda.gov.

Sincerely,

Manzoor Chaudry, DVM
Deputy Director
International Audit Staff
Office of International Affairs

Enclosure

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

JUNE 4 THROUGH JULY 3, 2008

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority [General Veterinary Inspectorate]
CVO	Chief Veterinary Officer
DCVO	Deputy Chief Veterinary Officer
DVI	District Veterinary Inspectorate
DVO	District Veterinary Officer
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
GVI	General Veterinary Inspectorate
<i>Lm</i>	<i>Listeria monocytogenes</i>
MARD	Ministry of Agriculture and Rural Development
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
PVI	Provincial Veterinary Inspectorate
PVO	Provincial Veterinary Officer
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedures
<i>Salmonella</i>	<i>Salmonella</i> species
VEA	European Community/United States Veterinary Equivalence Agreement
VI	Veterinary Inspector

1. SUMMARY

1.1 Description/Eligibility

This report summarizes the outcome of the audit conducted in Poland from June 3, 2008, to July 3, 2008. This was a routine audit. Poland is eligible to export pork meat products, including both fresh and frozen, to the United States. At the time of the audit, ten establishments were eligible to export to the United States. Between January 1, 2007, and June 30, 2008, Poland exported 31,823,860 pounds of pork meat products, including thermally processed commercially sterile, fully-cooked, not-shelf-stable, and heat-treated, not-fully-cooked, not-shelf-stable (smoked) products to the US. There were 48,528 pounds rejected for food safety concerns. Activities of the current audit appear in the table below.

The findings of the previous audit during March 2007 resulted in no restrictions to any of Poland's establishment's ability to export products to the United States.

1.2 Comparison of the Current Audit and the Previous Audit

		June 4-July 3, 2008	March 14-April 10, 2007
Levels of Government Oversight Audited			
	Headquarters	1	1
	Regional/Provincial	2	3
	County/District	3	3
	Establishment Level	9	6
Laboratories Audited			
	Microbiology	1	1
	Residue	1	0
Establishments Audited			
	Slaughter/processing	6	4
	Processing	3	2
Enforcement Actions Initiated			
	NOID	0	0
	Delistment	0	0
Risk Area Findings			
	Sanitation Controls (SSOP, SPS)	8	3
	Animal Disease Controls	0	0
	Slaughter/Processing (PR/HACCP)	2	2
	Residue Controls	0	0
	Microbiology Controls	1	1
	Inspection/Enforcement Controls	7	2
	Special Emphasis (HH, O157:H7)	0	0

2. INTRODUCTION

The audit took place in Poland from June 4 through July 3, 2008.

An opening meeting was held on June 4, 2008, in Warsaw with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Poland's meat inspection system.

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

3. OBJECTIVE OF THE AUDIT

This audit was a routine audit with a special emphasis on humane handling and slaughter of livestock. The objective of the audit was to evaluate the performance of the CCA with respect to controls over meat-producing establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA; two provincial inspection offices; two district offices; one laboratory performing analytical testing for residues and one laboratory conducting microbiological testing on U.S.-destined product; seven slaughter and processing establishments; and two meat processing establishments.

4. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters, regional, and district offices. The third part involved on-site visits to nine establishments; seven slaughter/processing establishments, and two processing establishments. The fourth part included visits to The National Veterinary Research Institute (NVRI) and the Veterinary Hygiene Laboratory at Szczecin. The NVRI, which is the national reference laboratory, was audited for its residue related functions, and the Veterinary Hygiene Laboratory at Szczecin for its microbiological testing programs on the product destined for US export. While NVRI performs numerous functions, those related to FSIS requirements include the analyses of field samples for Poland's national residue control program, some microbiological testing for generic *Escherichia coli* (*E. coli*), *Salmonella* species (*Salmonella*), and *Listeria monocytogenes* (*Lm*), and oversight of the other government laboratories conducting similar microbiological testing throughout Poland's 16 provinces.

Program effectiveness determinations of Poland's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation of Sanitation Standard Operating Procedures (SSOP) and Sanitation Performance Standards (SPS); (2) animal

disease controls; (3) slaughter/ processing controls, including the implementation of Hazard Analysis and Critical Control Points (HACCP) programs and a testing program for generic *E. coli*, (4) residue controls; and (5) enforcement controls, including a testing program for *Salmonella*. Poland's inspection system was assessed by evaluating these five risk areas.

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

At the opening meeting, the auditor explained to the CCA that their inspection system would be audited in accordance with three areas of focus. First, under provisions of the European Community/United States Veterinary Equivalence Agreement (VEA), the auditor would audit Poland's meat inspection system against European Community (EC) Directive 64/433 of June 1964; EC Directive 96/22 of April 1996; and EC Directive 96/23 of April 1996. These directives have been declared equivalent by FSIS under the VEA.

Second, in areas not covered by these directives, the auditor would audit against FSIS requirements. FSIS requirements include daily inspection in all certified establishments, humane handling and slaughter of animals, the handling and disposal of inedible and condemned materials, species verification testing, requirements for HACCP, SSOP, testing for generic *E. coli* and *Salmonella*, and government oversight/enforcement.

Third, the auditor would audit against any equivalence determinations that have been made by FSIS for Poland under provisions of the Sanitary and Phytosanitary Agreement. Currently, FSIS has determined that one alternate procedure is equivalent to U.S. requirements:

- The use of *Enterobacteriaceae* and total viable count (TVC) in lieu of generic *E. coli* is acceptable for all EU exporting countries. However, none of the establishments audited utilized this equivalence determination, and continued to rely on generic *E. coli* as an indicator of process control.

5. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of U.S. laws and regulations, in particular:

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

In addition, compliance with the following European Community Directives was also assessed:

- Council Directive 64/433/EEC of June 1964, entitled “Health Problems Affecting Intra-Community Trade in Fresh Meat.”
- Council Directive 96/23/EC of 29 April 1996, entitled “Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Animal Products.”
- Council Directive 96/22/EC of 29 April 1996, entitled “Prohibition on the Use in Stockfarming of Certain Substances Having a Hormonal or Thyrostatic Action and of β -agonists.”

6. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on the FSIS website at the following address:

http://www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp.

The following deficiencies were identified during the FSIS audit conducted in May/June 2005:

- In one establishment, the receptacles in the processing room used for storing inedible materials did not bear conspicuous and distinctive markings on their surfaces so as to identify their purpose.
- In one establishment, several containers used for storing packaged product in the cooler presented a visibly unclean outer surface with a sticky residue originating from the adhesive backing of previously applied labels.
- In one establishment, condensation was seen dripping from an air-cooling unit onto the floor of the ham packaging room.
- In one establishment, the design of the HACCP records associated with the chilling CCP could not accurately demonstrate that the critical limit was met.
- In two establishments, the hazard analysis addressing the production of cooked sausage did not accurately identify all the possible hazards associated with the chilling of product after cooking (e.g. *Clostridium perfringens*).
- In two establishments, noncompliances associated with the CCP for visible feces, ingesta, and milk (“zero tolerance”) were identified.
- Two establishments were utilizing the “sponging” method without correct implementation of process control techniques.
- At the National Reference Lab (Puławy), the actual number of the security seal was not indicated on the forms contained within the sample box. This made it impossible to determine whether the seal found on the box was the original seal.

The following deficiencies were identified during the FSIS audit conducted in March 2007:

- In one establishment, an unidentified residue was seen on several rods on which sausages were to be hung.
- In one establishment, rail grease was observed on a swine carcass.
- In one establishment, condensation was observed on overhead structures in the product-chilling room.

7. MAIN FINDINGS

7.1. Legislation

The auditor was informed that the relevant EC Directives, determined equivalent under the VEA, had been transposed into Poland's legislation.

No new changes in Poland's legislation were reported during this audit.

7.2. Government Oversight

The Polish meat inspection system is organized in three levels. The first level is the Ministry of Agriculture and Rural Development (MARD), which includes the General Veterinary Inspectorate (GVI). This is the level of government that FSIS holds responsible for ensuring that FSIS requirements are implemented and enforced relative to the exporting of meat products to the United States. The second level is the Provincial Veterinary Inspectorate (PVI). There are 16 provinces (each province has between 15 to 32 districts). The third level is the District Veterinary Inspectorate (DVI). The District is responsible for all veterinary related activities, including meat inspection and monthly audits at each certified US establishment. The inspection staff assigned to the certified establishments is direct hires of DVI and consists of two types of veterinarians. The primary distinction between the two types of veterinarians can be delineated as permanent or contracted. The contracted veterinarians, who generally become permanent, are appointed by a District Veterinary Officer (DVO) under a national legislative authority to perform specific inspection functions as dictated by the DVO.

Copies of the District monthly audit report are provided to the veterinarian in-charge of the certified establishment, District and Provincial offices.

The PVI may approve or disapprove a meat establishment based on the DVI office recommendation. The PVI notifies the CCA regarding approval or disapproval of U.S. certified establishments. The CCA also retains the authority to delist an establishment and maintains the list of the certified establishments. Since the last audit, the CCA has conducted official audits on a monthly basis of the United States certified establishments (Poland has opted to maintain a monthly frequency for the periodic supervisory reviews). DVI offices have reviewed the United States certified establishments on a monthly basis and have in turn been reviewed by the PVI, which also directly reviewed the certified establishment(s) under their purview. The CCA headquarters received copies of the DVI and PVI monthly review reports and any noncompliance records issued.

7.2.1. CCA Control Systems

FSIS audited two PVI offices, three DVI offices, and the inspection offices located at nine certified establishments. The listing and delisting of the US-certified establishments is done by the DVI and PVI offices. All veterinarians and inspectors in establishments certified by Poland as eligible to export meat products to the United States were employees of the Local District Veterinary Inspectorate.

7.2.2. Ultimate Control and Supervision

PVI offices have the authority to supervise the activities of the DVI offices and the DVI offices have the authority to supervise the activities of the veterinarians and inspectors in the certified establishments. FSIS regulatory requirements are normally distributed via Intranet from the CCA to the provinces. In turn, the provinces pass the information to the districts electronically and also deliver in hard copy format, as needed.

Uniform standard procedures based on FSIS requirements and the FSIS Directive 5000.1, Revision 2, as well as related documents had been translated into Polish. These documents were being used as the basis for the standard procedures used by the government of Poland's meat inspection officials at all levels to verify adherence to FSIS requirements in the certified establishments.

7.2.3. Assignment of Competent, Qualified Inspectors

The DVI has total authority for all human resource activity. All establishments were staffed with competent permanent (full-time) and/or part-time (contracted) veterinarians and non-veterinary inspectors.

7.2.4. Authority and Responsibility to Enforce the Laws

The CCA has the authority and responsibility to enforce applicable laws and regulations. Continuous daily inspection was provided for all certified slaughter and processing establishments.

- Although none of the nine establishments audited were delisted or received a Notice of Intent to Delist (NOID), noncompliances involving the enforcement of FSIS requirements were identified at seven of the nine establishments visited.
- The government laboratories conducting microbiological testing for *Salmonella* and *Listeria monocytogenes* were utilizing methods which differed from those employed by FSIS. This observation was initially made during the FSIS audit that was conducted in March 2007.

7.2.5. Adequate Administrative and Technical Support

The CCA has the administrative and technical support to implement U.S. requirements such as the translation and dissemination of pertinent FSIS requirements to all levels of government inspectors with responsibility for overseeing U.S. certified establishments. During the audit, it was observed that pertinent FSIS requirements had been disseminated to PVI, DVI, and local inspection offices involved with U.S. export. Many of the translated versions of FSIS documents are also posted on an internet website. GVI officials have organized meetings/training sessions on these requirements. They plan to continue conducting more such meetings to ensure a continuing understanding and to clarify issues which could result in inconsistencies between the provinces, districts, and/or establishments.

The CCA did have the ability to support a third-party audit.

7.3. Headquarters Audit

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

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

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

7.3.1. Audit of Regional and Local Inspection Sites

Two PVI offices located in Lublin and Szczecin were audited. In addition, three DVI offices were audited. These DVI offices were located in Łuków, Ostrzeszow and Ostróda.

8. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of nine establishments: seven slaughter/processing establishments and two processing establishments. None of the establishments audited were delisted or issued a Notice of Intent to Delist (NOID).

Specific deficiencies observed are reported in the attached individual establishment checklists.

9. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

Residue laboratory audits focus on sample handling, sampling frequency, timely analysis, data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions.

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

The Veterinary Hygiene Laboratory at Szczecin was audited for its microbiological testing programs on the product destined for US export. This laboratory performs numerous functions. Those functions related to FSIS requirements include the analyses of field samples for Poland's national residue control program, some microbiological testing for generic *E. coli*, *Salmonella*, and *Lm*, and oversight of the other government laboratories conducting similar microbiological testing throughout Poland's 16 provinces (regions).

The following deficiency was reported related to this laboratory's role:

During verification of the previous year's audit findings, it was observed that the laboratory procedures noted below had not been corrected.

- The scope of oversight functions exercised by the reference laboratory did not ensure that the appropriate FSIS microbial testing methods were utilized, as it was determined during the course of the audit that the provincial (regional) laboratories conducting testing for *Salmonella* and *Lm* employed methods which differed from those utilized by FSIS.

The National Veterinary Research Institute in Puławy was audited for its residue related functions.

No deficiencies were reported concerning Poland's residue testing program.

10. SANITATION CONTROLS

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

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

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

10.1. SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S domestic inspection program. The SSOP in all nine establishments audited were found to meet the basic FSIS regulatory requirements, with the exception of the following deficiencies:

- In one establishment, residues of fat and meat particles from the previous day's operations were observed on various food contact surfaces in the processing and prime portion cutting rooms during pre-operational sanitation inspection.
- In one establishment, meat/fat residues from the previous day's operations were observed on multiple ready-to-use metal rods used to hang pork sausages.
- In one establishment, meat/fat residues from the previous day's use were observed on ready-to-use aprons.
- In three establishments, the containers used in the evisceration rooms to collect edible pork fat were placed in such a manner that debris from the operator stands and the boots of employees at the stands was falling onto the product. The dripping of fluids and water from the carcasses passing above the stand also dropped into the product.

10.2 Sanitation Performance Standards

The following deficiencies were identified regarding sanitation performance standards:

- In three establishments, inadequate ventilation was reported.
- In four establishments, deficiencies regarding sanitary operational practices were reported.
- In one establishment, grounds outside the establishment were not maintained to prevent conditions that could lead to insanitary conditions.
- In one establishment, requirements regarding construction and maintenance to prevent insanitary conditions were not met.

10.3 EC Directive 64/433

In five of nine establishments audited, the provisions of EC Directive 64/433 were not effectively implemented.

11. ANIMAL DISEASE CONTROLS

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

Animal disease restrictions are in place for Bovine Spongiform Encephalopathy, Foot and Mouth Disease, Classical Swine Fever, and Swine Vesicular Disease. APHIS has assigned Poland a status as free of or at low risk for Classical Swine Fever, Foot and Mouth Disease, and Swine Vesicular Disease. Poland is eligible to export pork meat products, including fresh and frozen meats to the United States.

12. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures;

ante-mortem disposition; humane handling and slaughter; post-mortem inspection procedures; post-mortem disposition; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products. The controls also include the implementation of HACCP systems in all establishments and implementation of a generic *E. coli* testing program in slaughter establishments.

12.1. Humane Handling and Slaughter

No deficiencies in humane handling and slaughter were observed.

12.2. HACCP Implementation.

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the U.S. domestic inspection program.

The HACCP programs were reviewed during the on-site establishment audits. The following deficiencies were identified in two of the nine establishments audited:

- In one of the nine establishments audited, at the CCP for zero tolerance for visible feces, ingesta, and milk, the carcasses were not fully split, and therefore, were not being properly presented for inspection for the presence of contamination on the inner surfaces of the thorax, neck, and head.
- In one of the nine establishments audited, the edible-offal harvesting step was not indicated in the flow diagram, nor had a hazard analysis for the step been conducted.

12.3. Testing for Generic *E. coli*

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

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

No deficiencies were reported as a result of this evaluation.

12.4. Testing for *Listeria monocytogenes* in Ready-to-Eat Products

Four of the nine establishments audited were producing ready-to-eat products (cooked hams) for export to the United States. As these products are prepared in cooking bags where there is no post-lethality exposure to the environment, the requirement to test the finished product for *Listeria monocytogenes* under FSIS Directive 10,240.4 does not apply.

Two of the nine establishments audited that were producing ready-to-eat products requiring compliance with 9 CFR 430 had adopted Alternative Three (3) to control hazards identified in their processes.

The aforementioned products are subject to non-risk based testing for *Lm* and *Salmonella*, as mandated by FSIS Directive 10,210.1, Amendment 6. Regarding the testing for *Listeria monocytogenes* in ready-to-eat products, the following observation was made:

- The government laboratories conducting microbiological testing for *Lm* were utilizing a different method from that employed by FSIS. At the time of the audit, Poland did not have an equivalence determination in place which would permit the use of this alternative method. This observation was also made during the previous audit.

12.5. Testing for *Salmonella* in Ready-to-Eat Products

Four of nine establishments were producing ready-to-eat product and were required to meet FSIS *Salmonella* testing requirements. The following deficiency was observed and was also noted during the previous audit:

- The government laboratories conducting microbiological testing for *Salmonella* were utilizing a different method from that employed by FSIS. At the time of the audit, Poland did not have an equivalence determination in place which would permit the use of this alternative method.

12.6. EC Directive 64/433

Those provisions of EC Directive 64/433 related to slaughter controls were effectively implemented at the six slaughter establishments audited.

13. RESIDUE CONTROLS

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

The National Reference Laboratory in Puławy was audited and no deficiencies were reported.

13.1. EC Directive 96/22

No deficiencies were reported concerning the provisions of EC Directive 96/22.

13.2. EC Directive 96/23

No deficiencies were reported concerning the provisions of EC Directive 96/23.

14. ENFORCEMENT CONTROLS

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

14.1. Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments. No deficiencies were reported.

14.2. Testing for *Salmonella* in Raw Product

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

Six of the nine establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing requirements for raw product. The following deficiency was noted:

- The government laboratories conducting microbiological testing for *Salmonella* were utilizing methods which differed from those employed by FSIS. At the time of the audit, Poland did not have an equivalence determination in place which would permit the use of these alternative methods. This deficiency was also noted during the previous audit.

14.3. Species Verification

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

- One of the nine establishments that were required to conduct species verification was not conducting it.

14.4. Periodic Reviews

In all establishments visited, periodic supervisory reviews were being performed and documented as required.

14.5. Inspection System Controls

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

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

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

- Deficiencies involving the enforcement of FSIS requirements were identified at seven of the nine establishments visited.

15. CLOSING MEETING

A closing meeting was held on July 3, 2008, in Warsaw with the CCA. At this meeting, the preliminary findings from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Alam R Khan, DVM
Senior Program Auditor

A handwritten signature in blue ink, appearing to read 'Alam R Khan', written over a horizontal line.

16. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Checklists

Foreign Country Response to Draft Final Audit Report (when it becomes available)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Grupa Animex S.A. Morliny 15 14-100 Ostroda ul. Pomorska 115b Szczecin 70-812	2. AUDIT DATE 06/16/08	3. ESTABLISHMENT NO. 32620201	4. NAME OF COUNTRY Poland
	5. NAME OF AUDITOR(S) Alam Khan, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

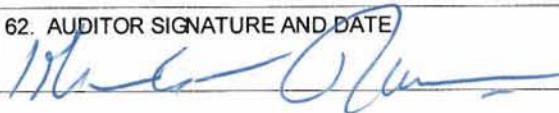
Date: 06/16/08 Est. #: 32620201 (Grupa Animex S.A. [S/P/CS]) (Szczecin, Poland)

10/51. a) Residues of fat and meat particles from the previous day's operation were observed on various food contact surfaces in the processing and prime portion cutting rooms during pre-operational verification. Immediate corrective actions were initiated by the establishment [Regulatory Reference: 9 CFR §416.13]

b) In the evisceration room, a stainless steel tote to collect edible fat harvest was stored in such a manner that the debris from the operators' boots, platform, and the wash waste from passing carcasses were falling directly onto the edible product. Immediate corrective action was initiated and the product was condemned. [Regulatory reference: 9 CFR §416.13]

61. NAME OF AUDITOR
Alam Khan, DVM

62. AUDITOR SIGNATURE AND DATE



United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Wielkopolska Wytworinia Zywnosci " PROFIT" ul. Kolejowa 3 Grabow nad Proсна 63-520	2. AUDIT DATE 06/20/08	3. ESTABLISHMENT NO. 30184103	4. NAME OF COUNTRY Poland
	5. NAME OF AUDITOR(S) Alam Khan, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Date: 06/20/08 Est #: 30184103 (Wielkopolska Wytworinia Zywnosci "PROFI" [PJ] (Grabow nad Proсна, Poland)

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

61. NAME OF AUDITOR
Alam Khan, DVM

62. AUDITOR SIGNATURE AND DATE

 DVM

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION "Sokolow" S.A. Oddzial Sokolowskie Zaklady Miesne AL-550-lecia I Sokolow Podlaski 08-300	2. AUDIT DATE 06/10/08	3. ESTABLISHMENT NO. 14290201	4. NAME OF COUNTRY Poland
	5. NAME OF AUDITOR(S) Alam Khan, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Date: 06/10/08 Est #: 14290201 ("Sokolow" S.A. Oddzial Sokolowskie Zaklady Miesne [S/P]) (Sokolow Podlaski,

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

61. NAME OF AUDITOR

Alam Khan, DVM

62. AUDITOR SIGNATURE AND DATE

 DVM

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Zaklady Miesne "Animex" S.A. ul.Suwalska 86, Oddzial in Starachowicach ul. Krancowa 4 27-200 Starachowice 19-300 ELK	2. AUDIT DATE 03/21/07	3. ESTABLISHMENT NO. 26110201	4. NAME OF COUNTRY Poland
	5. NAME OF AUDITOR(S) Alam Khan, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Date: 03/21/07 Est. #: 26110201 (Zaklady Miesne "Animex" S.A. [S/P/CS]) (Starachowice, Poland)

- 15/51. The edible offal harvesting step was not indicated in the flow diagram nor was a hazard analysis for the step conducted. The official veterinarian leading the audit gave assurance that HACCP plan will be reviewed and has the finding addressed as soon as possible. [Regulatory reference: 9 CFR §417.2(c)]
- 38/48/56. A dumpster containing swine viscera stored outside the establishment was emitting foul odor and attracting flies. The contents in the container were not denatured. [Regulatory reference: 9 CFR §416.2(a)] [EC Directive 64/433]
- 46/51/56. Carcasses hind feet were contacting against a steel metal plate with rough surface at the transfer conveyor belt in the primal parts cutting room creating insanitary conditions and potential for cross contamination. The official veterinarian leading the audit gave assurance to have problem corrected as soon as possible. [9 CFR §416.4(a)] [EC Directive 64/433]

61. NAME OF AUDITOR

Alam Khan, DVM

62. AUDITOR SIGNATURE AND DATE

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United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Zakłady Miesne LMeat Lukow ul. Przemysłowa 15 Lukow 21-400	2. AUDIT DATE 06/09/08	3. ESTABLISHMENT NO. 6110266	4. NAME OF COUNTRY Poland
	5. NAME OF AUDITOR(S) Alam Khan, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Date: 06/09/08 Est #: 6110266 (Zaklady Miesne LMeat Lukow [S/P/CS]) (Lukow, Poland)

10. a) Fat and meat residues from previous day's use were observed on ready-to-use aprons. Entire rack of aprons was rejected by the official veterinarian leading the audit.
b) In evisceration room a stainless steel tote used to collect porcine edible fat was placed in such a manner that the debris from the operator's stand, boots and the drippings from carcasses wash were directly falling onto the product. The product was retained by the official veterinarian. The collection of edible was suspended until the new system is developed. [Regulatory reference(s): 9 CFR §416.13]
- 39/51/56.a) Peeling paint was observed in freezer # 39, wafers of peeled paint were found on the wrapped product. The establishment management gave assurance that freezer will be painted as soon as possible.
b) On the freezer # 33 door, the flaps of the plastic curtain that was loosely anchored and apt to fall were broken and frayed. An ice build up was also seen on the floor around the entry into the same freezer creating insanitary conditions. [9 CFR §416.2(b)] [EC Directive 64/433]
- 46/51/56.a) In freezers 39 and 40 the exposed pork products in plastic bins were stacked on the wooden pallets that were uncleaned. Wood chips and loose debris from the pallets were posing potential for product contamination.
b) At final rail inspection station the carcasses were touching boots of the inspector. [9 CFR §416.4(a)] [EC Directive 64/433]

61. NAME OF AUDITOR

Alam Khan, DVM

62. AUDITOR SIGNATURE AND DATE

Handwritten signature of Alam Khan, DVM in blue ink.

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Danish Crown Torunska 262, Kolo 62-600	2. AUDIT DATE 06/23/08	3. ESTABLISHMENT NO. 30094204	4. NAME OF COUNTRY Poland
	5. NAME OF AUDITOR(S) Alam Khan, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Date: 06/23/08 Est #: 30094204 (Danish Crown [P]) (Kolo, Poland)

- 10. The pre-operational/operational sanitation of ham hanging trees received with the product at the establishment was not addressed in the establishment's SSOP, pre-requisite or other SOPs. [Regulatory reference(s): 9 CFR §416.11-.12]
- 15/51. Control measures to prevent hazards that are likely to occur from thermal abuse of returned product were not addressed in HACCP or other food safety programs. [9 CFR §417.2(c)]
- 41/56. In packaging room, condensate from an exhaust conduit was readily dripping on the floor near raw product packaging area. [9 CFR §416.2(d)] [EC Directive 64/433]

61. NAME OF AUDITOR
Alam Khan, DVM

62. AUDITOR SIGNATURE AND DATE



Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Grupa Animex S.A. Morliny 15 Ostroda 14-100	2. AUDIT DATE 06/25/08	3. ESTABLISHMENT NO. 28150201	4. NAME OF COUNTRY Poland
	5. NAME OF AUDITOR(S) Alam Khan, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Date: 06/25/08 Est #: 28150201 (Grupa Animex S.A. [S/P/CS]) (Ostroda, Poland)

- 10. Meat/fat residues from the previous day's operation were observed on multiple ready to use metal sticks used to hang pork sausages in the pork sausage room. The official veterinarian rejected the entire rack of sticks and sought corrective action by the establishment.

- 34/51. Neither the establishment nor government officials were conducting species testing. The establishment will develop the testing plan soon. [Regulatory reference(s): 9 CFR §327.2(a) (2)(i)(F)]

- 41/56 Beaded condensation was observed on ceilings and doors of production rooms. No exposed product was stored underneath the affected areas. Immediate corrective action to control condensation were initiated by the establishment.[9 CFR §416.2(d)] [EC Directive 64/433]

- 46/51/56.The establishment did not clearly identify the use of blue plastic sheets. These sheets were being used as waste bin liners and on the steel tote bins to cover the edible product. A loose pack of such blue plastic sheets stored on a wooden pallet was contacting wall. The official veterinarian rejected the loose pack of the plastic sheets and gave assurance that the use of plastic sheets will be correctly implemented. [9 CFR §416.4(a)] [EC Directive 64/433]

61. NAME OF AUDITOR
Alam Khan, DVM

62. AUDITOR SIGNATURE AND DATE



United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Sokolow S.A. Oddzial Zaklady Miesne Jaroslaw ul. Przemyslowa 2. Jaroslaw 37-500	2. AUDIT DATE 6/27/08	3. ESTABLISHMENT NO. 18040201	4. NAME OF COUNTRY Poland
	5. NAME OF AUDITOR(S) Alam Khan, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Date: 6/27/08 Est #: 18040201 (Sokolow S.A. Oddzial Zaklady Miesne Jaroslaw [S/P/CS]) (Jaroslaw, Poland)

- 18/51 At the CCP for Zero tolerance, the carcasses were not fully hemi-sected, and thus were not being monitored for the possible presence of ingesta and fecal on the inner surface of thorax, neck and head regions. [Regulatory reference(s): 9 CFR §417.2(c)(4)]
- 41/56. Varying degrees of condensation were observed at various locations in production rooms. No exposed product was observed stored directly under the affected areas. The official veterinarian rejected all affected areas. [9 CFR §416.2(d)] [Council Directive 64/433]
- 46/56. Several ready to use metal sticks used to hang sausage in the sausage preparation room were observed with the meat/fat residues from the previous day's operation. The entire rack containing metal sticks was rejected by the official veterinarian. [9 CFR §416.4(a)] [EC Directive 64/433]

61. NAME OF AUDITOR

Alam Khan, DVM

62. AUDITOR SIGNATURE AND DATE

 Alam Khan
DVM

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Prime Food Sp. z.o.o. ul. Mlynska 43B Przechlewo 77-320	2. AUDIT DATE 06/13/08	3. ESTABLISHMENT NO. 22030207	4. NAME OF COUNTRY Poland
	5. NAME OF AUDITOR(S) Alam Khan, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Date: 06/13/08 Est #: 22030207 (Prime Food Sp. z.o.o. [S/P/CS]) (Przechlewo, Poland)

- 10/51. In evisceration room a stainless steel tote used to collect porcine edible fat was placed in such a manner that the debris from the operator's stand, boots and the drippings of carcasses wash were directly falling onto the product. [Regulatory reference(s): 9 CFR §416.13]

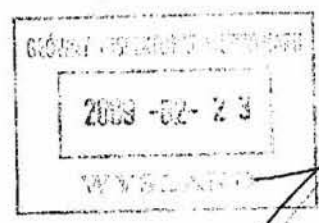
61. NAME OF AUDITOR
Alam Khan, DVM

62. AUDITOR SIGNATURE AND DATE



lupis

Warsaw, February 2009



Mr. Don Carlson, DVM
Acting Director
International Audit Staff
Office of International Affairs
Food Safety and Inspection Service
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250-3700
United States of America

GIWue.084-USA-2/09

Dear Mr. Carlson,

Referring to the draft final report of the audit of Poland's meat inspection system June 4 through July 3, 2008, received by the General Veterinary Inspectorate (GVI) on 14 January 2009, I would like to provide you with comments to this document.

According to information collected from field bodies of the Veterinary Inspection, establishments audited by FSIS have undertaken corrective actions and all deficiencies observed by the appropriate FSIS veterinary services have been rectified.

Due to the fact that in the draft final audit report one of the audited establishments (Zakłady Mięsne „AGRYF” S.A., ul Pomorska 115b, 70-812 Szczecin, Nr 32620201) is listed in the form 5000-6 under an out-dated name, I send you an up-to-date list of Polish establishments approved to export to the USA market in the attachment.

MPK
B

General Veterinary Inspectorate, Wspólna Street 30, 00-930 Warsaw
phone: (+ 48 22) 623-20-88, fax: (+ 48 22) 623-14-08, e-mail: wet@wetgiw.gov.pl, www.wetgiw.gov.pl

Also the GVI submits comments to items 7.2 and 7.2.3 of the report on the procedure of hiring employees in the Veterinary Inspection.

Pursuant to Article 16 of the Act of 29 January 2004 *on the Veterinary Inspection* (Journal of Laws of 2007, No. 121, item 842), official veterinarians are appointed by a district veterinary officer, not by a district veterinary inspectorate.

As to the Regional Veterinary Laboratory in Szczecin where one case of non-compliance was observed referring to methods of microbiological testing for *Salmonella* and *Listeria monocytogenes*, different to those used by FSIS, I shall inform you of the following.

In connection to similar deficiencies observed during audits in the previous years, a group of microbiology experts have been created on the level of the European Commission to establish the equivalency between laboratory procedures employed in official laboratories on the territories of Member States and FSIS requirements.

A representative of the National Research Veterinary Institute in Pulawy takes part in meetings of the above-mentioned group on this matter.

Pursuant to Article 11 and Article 33 of the Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 *on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules*, the Institute in Pulawy is a national reference laboratory, which within the scope of its activities coordinates official laboratories responsible for sample analysis and is authorised to determine research methods on the international level.

The Regional Veterinary Laboratory in Szczecin carries out microbiological food tests for:

- the presence of *Salmonella* by quality method according to the norm PN-EN ISO 6579:2003 (accredited method);
- the presence of *Listeria monocytogenes* by quality method according to the norm PN-EN ISO 11290-1:1999 + A1:2005 (accredited method);
- the number of *Listeria monocytogenes* by quantity method according to the norm PN-EN ISO 11290-2:2000 + A1 : 2005 + Ap1 : 2006 + Ap2 : 2007 (accredited method).

Tests carried out in the Regional Veterinary Laboratory in Szczecin for *E. coli*, *Listeria monocytogenes*, *Salmonella* are accredited by the Polish Centre for Accreditation and the laboratory regularly takes part in comparison tests between laboratories organised by the reference laboratory in Pulawy to check their efficiency.

Please, accept my highest consideration.

Sincerely yours,

J. J. DEPUTY
CHIEF VETERINARY OFFICER
Krzysztof Jazdzewski

LISTA POLSKICH ZAKŁADÓW UPRAWNIONYCH DO EKSPORTU NA RYNEK USA
FOREIGN OFFICIAL MEAT ESTABLISHMENT CERTIFICATE

Ref. Lp.	CONTROL NUMBER Numer kontrolny	NAME Nazwa zakładu	ADDRESS Adres	APPROVED ACTIVITY Zatwierdzony rodzaj działalności							SPECIES OF ANIMALS Gatunek zwierząt		
				S	C	P	CS	B	O/G	Po	E		
1.	26 11 02 01	Zakłady Mięсне Animex S.A.	19-300 Eik ul. Suwalska 86 Oddział w Starachowicach 27-200 Starachowice ul. Krańcowa 4	X	X	X						X	
2.	32 62 02 01	Grupa Animex S.A. Morliny 15 14-100 Ostróda	70-812 Szczecin ul. Pomorska 115b	X	X	X						X	
3.	18 04 02 01	"SOKOŁÓW" S.A. Oddział Zakłady Mięsne "JAROSŁAW"	37-500 Jarosław ul. Przemysłowa 2	X	X	X						X	
4.	28 15 02 01	Grupa ANIMEX Spółka Akcyjna	14-100 Ostróda Morliny 15		X	X						X	
5.	14 29 02 01	"SOKOŁÓW" S.A. Oddział Sokołowskie Zakłady Mięsne	08-300 Sokołów Podlaski Al. 550-lecia 1	X	X	X						X	
6.	22 03 02 07	PRIME FOOD Sp. z o. o.	77-320 Przechlewo ul. Młyńska 43B	X	X	X						X	
7.	30 18 41 03	Wielkopolska Wytwórnia Żywności "PROFI" S.A.	63-520 Grabów n/Prosną ul. Kolejowa 3			X						X	X

8.	06 11 02 66	„LMEAT-LUKÓW” S.A.	21-400 Łuków ul. Przemysłowa 15	X	X	X			X
9.	30 09 02 01	SOKOŁÓW S.A. Oddział Zakłady Mięsne w Kole	62-600 Koło ul. Toruńska 262			X			X
10.	30 09 42 04	Danish Crown Sp. z o.o. w Kole	ul. Toruńska 262 62-600 Koło		X				X

S - slaughter/ ubój

C - cutting/ rozbiór

P - processing/ przetwórstwo

Cs - cold store/ składowanie

B - bovine meat / mięso wołowe

O/G - ovine/goat meat / mięso z owiec/kóz

Po - porcine meat / wieprzowina

E - equidae meat / mięso z koniowatych