



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

FEB 19 2009

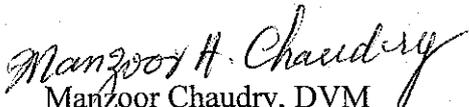
Mag. Ulrich Herzog
Chief Veterinary Officer
Head of Department IV/B
Bundesministerium für Gesundheit, Familie und Jugend
Radetzkystrasse 2
1030 Wien
Austria

Dear Mag. Herzog:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Austria's meat inspection system September 12 through September 24, 2008. The comments received from the government of Austria 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

U. S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
OFFICE OF INTERNATIONAL AFFAIRS
INTERNATIONAL AUDIT STAFF
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MEMORANDUM

TO: Quintin Gray, Minister Counselor
US Embassy, Vienna
Boltzmanngasse 16, A-1091
Vienna, Austria, Postal Code A-1090

FEB 19 2009

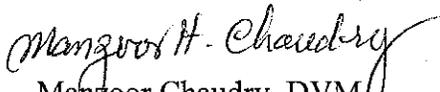
FROM: Manzoor Chaudry
Deputy Director
International Audit Staff, OIA, FSIS, USDA

SUBJECT: FSIS FINAL AUDIT REPORT FOR AUSTRIA

Dear Mr. Gray,

Please deliver the attached final audit report to Mag. Ulrich Herzog, Chief Veterinary Officer, Head of Department IV/B, Bundesministerium für Gesundheit, Familie und Jugend. Please contact me via email at manzoor.chaudry@fsis.usda.gov, if you have any further questions.

Best regards,


Manzoor Chaudry, DVM

cc list:

Quintin Gray, Minister Counselor, US Embassy, Vienna
Andreas Somogyi, Economic Counselor, Embassy of Austria
Wolf Maier, Counselor, Food Safety and Consumer Affairs, EC
Bernard Van Goethem, Director, Directorate E
Ghislain Marechal, EC, DG SANCO – Directorate General for Health and Consumers
Debra Henke, Minister-Counselor, US Mission to the EU, Brussels
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Stephen Hawkins, Acting Director, IES, OIA
Jerry Elliott, Director, IID, OIA
Barbara McNiff, Director, FSIS Codex Programs Staff, OIA
Yolande Mitchell, FCPS, OIA
Francisco Gonzalez, IES, OIA
Austria Country File

FSIS:OIA:IAS:DIRECTOR:202-205-3873:AUSTRIA
FINAL AUDIT LETTER February 17, 2009

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

SEPTEMBER 12 THROUGH SEPTEMBER 24, 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 – Bundeministerium für Gesundheit, Familie, und Jugend (BMGFJ) - Ministry of Health, Family and Youth
DAA	District Administrative Authorities
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
LH	Landeshauptman (Provincial Governor)
<i>Lm</i>	<i>Listeria monocytogenes</i>
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
PVS	Provincial Veterinary Services
SSOP	Sanitation Standard Operating Procedures
<i>Salmonella</i>	<i>Salmonella</i> species
VEA	European Community/United States Veterinary Equivalence Agreement

1. SUMMARY

1.1 Description/Eligibility

This report summarizes the outcome of the audit conducted in Austria from September 12 through September 24, 2008. This was a routine audit. Austria is eligible to export porcine processed product to the United States. At the time of the audit, two processing establishments were eligible to export to the United States. Between January 1, 2008 and July 11, 2008, Austria has not exported any pork raw or processed product directly to the United States. Activities of the current audit appear in the table below.

The findings of the previous audit during September 2007 resulted in no restrictions of any Austria establishment's ability to export pork to the United States.

1.2 Comparison of the Current Audit and the Previous Audit

	9/12-9/24, 2008	9/17-9/27, 2007
Levels of Government Oversight Audited		
Headquarters	1	1
2 nd Level	1	2
Establishment Level	1	1
Laboratories Audited		
Microbiology	0	0
Residue	0	0
Establishments Audited		
Slaughter/processing	0	0
Processing	2	2
Cold Store	0	0
Enforcement Actions Initiated		
NOID	0	0
Delistment	0	0
Risk Area Findings		
Sanitation Controls (SSOP, SPS)	4	2
Animal Disease Controls	0	0
Slaughter/Processing (PR/HACCP)	0	9
Residue Controls	0	0
Microbiology Controls	0	0
Inspection/Enforcement Controls	0	0
Special Emphasis (HH, O157:H7)	0	0

1.3 Summary Comments for the Current Audit

The results of this audit reflected a risk area finding in sanitation controls. Deficiency noted was in: a pre-operational SSOP and operational control.

2. INTRODUCTION

The audit took place in Austria from September 12 through September 24, 2008.

An opening meeting was held on September 15, 2008, in Vienna 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 Austria's meat inspection system.

The audit team was accompanied during the entire audit by representatives from the CCA, Bundesministerium für Gesundheit, Familie, und Jugend (BMGFJ), and representatives from the provincial and local inspection offices.

3. OBJECTIVE OF THE AUDIT

This audit was a routine annual audit. This included an evaluation of the performance of the CCA with respect to government controls over the (a) two processing establishments that are certified by the CCA as eligible to export pork products to the United States, and (b) a German government laboratory selected by the CCA to perform microbiological analytical testing of meat products destined for the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, the provincial headquarters, the district office, and two processing establishments approved to export product to the United States.

4. PROTOCOL

This on-site audit was conducted in three parts. One part involved visits with CCA officials, as well as provincial and district officials, regarding oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records and personal interviews in the country's inspection headquarters, regional offices, and local establishment level offices. The third part involved on-site visits to two processing establishments.

Program effectiveness determinations of Austria's inspection system focused on three areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures, (2) processing controls, including the implementation and operation of HACCP programs and (3) enforcement controls, including a testing program for *Salmonella* and *Listeria monocytogenes* (*Lm*). Austria's inspection system was assessed by evaluating these three risk areas.

During the on-site establishment visits, the auditors 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 Austria and determined that establishment and inspection system controls were in place to ensure that the production of meat products are safe, unadulterated and properly labeled.

In the opening meeting, the auditor explained that Austria's meat inspection system would be audited against three standards: (1) FSIS regulatory requirements (2) FSIS equivalence determinations made for Austria, and (3) the following three EC directives determined equivalent under the European Community/ United States Veterinary Equivalence Agreement (VEA): European Commission Directive 64/433/EEC of June 1964; European Commission Directive 96/22/EC of April 1996; and European Commission Directive 96/23/EC of April 1996.

FSIS requirements include, among other things, daily inspection in all certified establishments, periodic supervisory visits to certified establishments, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP, and testing for *Salmonella* and *Lm*.

Equivalence determinations are those that have been made by FSIS for Austria under provisions of the Sanitary/Phytosanitary Agreement.

- Sample collection: Austria collects 230 grams of raw ground product for *Salmonella* analysis for PR-HACCP compliance related to slaughter.
- Private laboratories analyze samples for *Salmonella*.
- Establishment employee collects the samples for *Salmonella*.
- Government laboratories analyze samples for generic *E. coli*.
- The method for conducting *Salmonella* analysis in RTE products is the same as the FSIS method.

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 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 FSIS's website at the following address:
http://www.fsis.usda.gov/Regulations_&Policies/Foreign_Audit_Reports/index.asp

The last two audits of Austria's inspection system have indicated repeated non-compliance with FSIS inspection requirements regarding HACCP and SSOP programs. The following findings were reported from these audits:

Audit of June/July 2003

Findings of this audit resulted in the continued delisting of both establishments.

Findings included the lack of direct supervision by the CCA of field activities; the private laboratory was using methods to test for *Salmonella* that had not been found to be equivalent by FSIS; daily inspection of the second shift was not provided correctly; and inspection system controls were inadequate.

Audit of September 2007

Deficiencies identified on the daily pre-operational and operational sanitation SSOP reports were not adequately described.

There was no documentation of the appropriate disposition of product(s) that may be contaminated and preventive measures for the recurrence of direct product contamination or adulteration in the pre-operational and operational sanitation monitoring records.

The establishments were not performing the direct observation verification procedures to ensure that the monitoring operation was implemented effectively.

The BMGFJ officials did not adequately describe the deficiencies that were observed and could not provide documentation to verify appropriate disposition of product or to verify the effectiveness of preventive measures taken.

The BMGFJ officials were not verifying the adequacy of the HACCP plans to ensure that FSIS requirements were met for reviewing the corrective actions, direct observation or measurement at a CCP, and onsite observations. Records indicated that inspection officials had only conducted a records review.

Initial validation of the HACCP plan had not been conducted to determine that it was functioning as intended.

The monitoring records for Critical Limits did not include the entries for the actual observations; e.g., the monitor was documenting one entry for the observation of 5 pH quantifiable values, whereas, according to the HACCP plan, entries were made for all of the pH quantifiable values monitored.

7. MAIN FINDINGS

7.1 Legislation

The CCA informed the auditor that Austria was operating under the European Union (EU) Hygiene legislation that became effective January 2006 for EU countries. The auditor advised the CCA that the new legislation has not yet been determined equivalent by FSIS and that Council Directive 64/433/EEC of June 1964 is still applicable relative to meat exports to the United States.

7.2 Government Oversight

The CCA, for matters concerning food and veterinary matters, is the Ministry of Health, Family, and Youth's (BMGFJ) Division IV. The Subdivision B of Division IV consists of six departments as follows:

1. Department IV/B/4 – food safety in meat production, veterinary residues, and animal by-products.
2. Department IV/B/5 – animal health, trade of live animals and veterinary legislation.
3. Department IV/B/6 – animal welfare and control of animal diseases and zoonoses.
4. Department IV/B/7 – food safety and official foodstuff controls, and food legislation.
5. Department IV/B/8 – FAO/WHO – Codex Alimentarius, novel food and food additives.
6. Department IV/B/9 – Department for matters of gene technology

In January 2006, Article 51 of the Austrian Law on Food Safety and Consumer Protection was passed by the Austrian government. This new law increases the oversight that the BMGFJ has over establishments that export meat product from Austria. This law also gives the BMGFJ the responsibility to grant eligibility to those establishments that want to export product to other countries, as well as revoke that eligibility should the establishments not meet the standards of the receiving countries. Lack of direct oversight by the CCA has been a repetitive finding in previous FSIS audits.

7.2.1 CCA Control Systems

Department IV/B/4 of the BMGFJ is the competent authority for the inspection of meat and poultry products. For Austria's domestic market, controls over meat inspection are conducted through an indirect federal administration. Under this administration, the BMGFJ implements federal legislation through the use of the Provincial Governor (LH) and the provincial authorities, which act on the behalf of the BMGFJ. The provincial governors carry out this responsibility through the veterinary officials in the provinces and districts. The controls that are provided by these officials in slaughter/processing establishments consist of ante-mortem and post-mortem inspection, as well as hygiene checks.

In response to a renewed interest in exporting product to the United States, and also from the results of previous FSIS audits in Austria, the BMGFJ has developed a new organizational structure to be utilized for product intended to be produced and shipped to the United States. This new structure provides the BMGFJ with a greater control over inspection activities at exporting establishments, and is intended to ensure uniform implementation of U.S. requirements.

7.2.2 Ultimate Control and Supervision

The BMGFJ has the legal authority to supervise and enforce Austria's meat inspection activities. It does so through the use of front-line inspectors and first-line supervisors, which are employed by the Provincial Veterinary Services (PVS). However, regarding product to be shipped to the United States, the front-line inspectors and first-line supervisors are appointed by the Federal Minister and act by order on behalf of the Federal Minister. The front-line inspectors have received training in FSIS inspection requirements from the first-line supervisors. At this time, the CCA has contracts with three front-line inspectors, which are veterinarians that serve part-time in this capacity and also work as private practitioners. The CCA has legislation that prohibits such veterinarians from performing inspection duties that could result in a conflict of interest.

The first-line supervisors received training at the FSIS seminars for international officials as well as other training provided by the CCA. They conduct monthly audits of two establishments certified to ship to the United States. These two establishments are owned by the same company and located in the Province of Upper Austria. The results of the monthly audits are compiled into reports that are sent to the BMGFJ. At this time, the CCA has contracts with four first-line supervisors.

One of the four first-line supervisors has been selected by the CCA as the senior first-line supervisor, who (from the province of Styria) will conduct annual audits of the two establishments on behalf of the CCA. This supervisor is also given the responsibility from the CCA to assure that the two establishments and inspection personnel have current knowledge of the FSIS requirements and to convey changes to these requirements to the BMGFJ, provincial authorities, and the front-line inspectors.

Daily inspection is provided in the two establishments audited by the front-line inspectors.

7.2.3 Assignment of Competent, Qualified Inspectors

All inspectors are veterinarians who meet the qualifications set by the BMGFJ. The inspection personnel increased their knowledge of the FSIS HACCP and SSOP requirements.

7.2.4 Authority and Responsibility to Enforce the Laws

The BMGFJ has the ultimate legal control over, and supervision of, the official activities of the inspection personnel. The BMGFJ has an indirect authority over the Austrian meat inspection program. The provinces take a much larger role in the conduct of inspection activities for the Austrian domestic market. With regard to product intended to be exported to the United States, the BMGFJ has taken steps to increase their oversight of inspection activities. There are provincial inspectors, under contract to the BMGFJ, auditing the establishments monthly (first-line supervisors) and conducting daily inspection (front-line inspectors). The BMGFJ has the authority to approve establishments for export to the United States. Should circumstances arise that the establishments no longer meet FSIS standards, the BMGFJ has the authority to immediately delist such establishments.

7.2.5 Adequate Administrative and Technical Support

The CCA has selected a German laboratory in Oldenburg to perform official microbiological testing of meat samples destined for the United States. The CCA provided indirect oversight of this laboratory and provided the oversight protocols to FSIS.

7.3 Headquarters Audit

The FSIS auditor conducted a review of inspection system documents at the headquarters of the BMGFJ in Vienna and the provincial headquarters in Linz. The records review focused primarily on food safety hazards and included the following:

- Internal review reports
- Supervisory visits to establishments
- New laws and implementation documents such as regulations, notices, directives and guidelines
- Sanitation and processing inspection procedures and standards
- Laboratory testing

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

Audit Local Inspection Sites

The FSIS auditor conducted interviews and reviewed records in three locations. The first was The Federal Ministry of Health, Family and Youth, located in Vienna, Austria. The Head of Department IV/B/4 was interviewed in this office, along with the Chief Veterinary Officer (Head of Subdivision B). The next office visited was The Provincial Government of Upper Austria, Department of Veterinary Services, in Linz, Austria. The interviewees included the Director of the Department of Veterinary Services, and a first-line supervisor from the Department of Veterinary Services. Finally, an interview of a

second-front line inspectors was conducted in the establishment in Bad Leonfelden, Austria.

The audits of these offices were conducted as a means of gathering information about the changes Austria has implemented since the last FSIS audit. The CCA appears to have taken adequate measures to improve their degree of oversight of inspection activities.

8. ESTABLISHMENT AUDITS

The FSIS auditor visited two processing establishments; one cutting establishment and one RTE establishment. At the time of this audit, these two establishments were eligible to export product to the United States. Currently, there are no slaughter establishments seeking eligibility. For the purpose of exporting to the United States, Austria will receive pork meat from establishments in Denmark or establishments in other member states of the EU that are certified to export meat products to the United States.

Specific deficiencies are noted on the attached individual establishment reports.

9. LABORATORY AUDITS

There was no review of laboratories conducted for this audit. Austria does not plan to conduct slaughter activities for U.S. export; thus, FSIS residue requirements are not applicable at this time. Austria intends to produce RTE products for U.S. export, therefore, microbiological sampling and testing are required by Austria. The CCA had not approved any laboratories in Austria to conduct microbiological testing on product to be shipped to the United States. The CCA sends official samples to a laboratory in Germany, which is approved by Germany's CCA, to carry out testing for the detection of *Salmonella* and *Lm* using methods that are consistent with the FSIS MLG methods.

10. SANITATION CONTROLS

As stated earlier, the FSIS audit focused on three areas of risk to assess Austria's meat inspection system. The first of these risk areas was Sanitation Controls.

Based on the on-site audits of the two establishments, and except as noted below, Austria'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 and practices; and good product handling and storage practices.

- In one establishment, sanitation crew employees did not adequately clean metal support for boning tables during the daily pre-operational sanitation.

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 the two establishments were found to meet the basic FSIS regulatory requirements, with the following deficiencies.

- In one establishment, the sausage-filling equipment was not adequately clean from fat particles during the daily pre-operational sanitation. The end portion of the equipment was not disassembled, reassembled and properly cleaned.
- In one establishment, during the operational sanitation, an establishment employee was observed conducting a meat-filling operation. The cart containing meat was pulled up and the wheels were observed to be wet from water picked up off the floor. When the cart was shaken by the employee, the water dripped onto the product.
- In one establishment, during the operational sanitation, an establishment employee was observed pushing a cart underneath a lifted moving cart. Water from the wheels of the lifted cart dripped onto the product in the cart directly below it.

11. ANIMAL DISEASE CONTROLS

At the time of this audit, there were no animals from Austria's domestic stock being used for intended U.S. export. The animals used for this purpose originate, and are slaughtered, in Danish certified establishments. During the 2008 audit of Denmark, the auditor noted that there had been no outbreaks of animal diseases with public health significance.

12. SLAUGHTER/PROCESSING CONTROLS

The second risk area that the FSIS auditor reviewed was Processing Controls. The controls include the following areas: 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 both establishments.

12.1 *Humane Handling and Humane Slaughter*

Since there were no slaughter establishments audited, the FSIS audit team did not review this risk area.

12.2 HACCP Implementation

Both establishments reviewed were 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.

No deficiencies were noted. Deficiencies pointed out during the audit of 2007 were corrected.

12.3 Testing for Generic *E. coli*

Since no slaughter establishments were reviewed during this audit, the FSIS audit team did not review this risk area. However, Austria has submitted a laboratory method for the testing of *E. coli* O157:H7 for an equivalence determination. Additional information has been requested from Austria, and they have replied that they are not interested in pursuing this determination at the present time.

12.4 Testing for *Listeria monocytogenes*

One of the establishments audited was producing a RTE product intended for indirect export to the United States. In accordance with FSIS requirements, the HACCP plan in this establishment had been reassessed to include *Lm* as a hazard reasonably likely to exist.

12.5 EC Directive 64/433

In both establishments, the provisions of EC Directive 64/433 were effectively implemented.

13. RESIDUE CONTROLS

This risk area does not apply to this audit because there are no approved slaughter establishments in Austria.

13.1 EC Directive 96/22

This directive does not apply to this audit because there are no approved slaughter establishments in Austria.

13.2 EC Directive 96/23

This directive does not apply to this audit because there are no approved slaughter establishments in Austria.

14. ENFORCEMENT CONTROLS

The third risk area that the FSIS audit team 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 both processing establishments.

14.2 Testing for *Salmonella*

Austria has adopted the FSIS regulatory requirements for testing of *Salmonella* in RTE products.

The CCA has selected an approved laboratory in Germany to perform analytical testing of official samples of meat products destined for the United States. The FSIS auditor did not audit the German laboratory.

14.3 Species Verification

Species verification testing is performed quarterly within the first year of shipping product to the United States, and then the frequency would be re-evaluated. The CCA will submit its species verification testing program to FSIS for review.

14.4 Periodic Reviews

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

14.5 Inspection System Controls

The CCA had controls in place for restricted product and inspection samples; 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.

15. CLOSING MEETING

A closing meeting was held on September 24, 2008, in Vienna, Austria, with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the audit team.

The CCA understood and accepted the findings.

For: ^{by} Don Carlin, DVM
International audit Staff Officer

16. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Forms

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 Hochreiter Fleischwaren GmbH A-4193 Reichenthal	2. AUDIT DATE 9/19/2008	3. ESTABLISHMENT NO. O-430/AEG	4. NAME OF COUNTRY Austria
	5. NAME OF AUDITOR(S) Oto Urban, 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	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	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork 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

Establishment: O-430/A EG, Hochreiter Fleischwaren GmbH, Austria September 19, 2008 processing

46/51. The establishment employee did not adequately clean metal support for boning tables during the daily pre-operational sanitation. This deficiency was corrected immediately by the establishment officials. [Regulatory references: 9 CFR 416.4(b)], EC, DIR.64/433, Chapter III (c).

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

Don Carter, DVM

09/19/2008

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Hochreiter Fleischwaren GmbH Kommunestrasse 1 4190 Bad Leonfelden	2. AUDIT DATE 9/18/2008	3. ESTABLISHMENT NO. O-430/EG	4. NAME OF COUNTRY Austria
	5. NAME OF AUDITOR(S) Oto Urban, 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	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork 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

Establishment: O-430/EG, Hochreiter Fleischwaren GmbH, Austria September 18, 2008 processing

10/51. The establishment did not adequately clean the sausage filling equipment during the daily pre-operational sanitation. The end portion of the equipment was not disassembled, reassembled and properly cleaned. This deficiency was corrected immediately by the establishment employee. [Regulatory references: 9 CFR 416.13(c), EC DIR 64/433, Chapter III (c)]

10/51. During operations, an establishment employee was observed conducting a meat filling operation. The cart containing meat was pulled up and the wheels were observed to be wet from water picked up off the floor. When the cart was shaken by the employee, the water dripped onto the product. This deficiency was corrected immediately and new carts were ordered with removable wheels. [Regulatory references: 9 CFR 416.13(c), EC DIR 64/433, Chapter III (c)]

10. During operations, an establishment employee was observed to push a cart underneath a lifted moving caret. Water from the wheels of the lifted cart dripped onto the product in the cart directly below it. This deficiency was properly corrected and the involved product was discarded. [Regulatory references: 9 CFR 416.13(c), EC DIR 64/433, Chapter III (c)]

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

Don Carlson, DVM 09/18/2008

Embassy of Austria
Washington, DC

The Trade & Economic Counselor

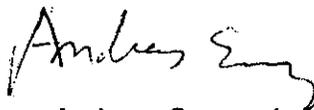
February 5, 2009
Ref. Washington-ÖB/WIRT/0029/2009

Mr. Stephen Hawkins
Acting Director
International Equivalence Staff
Office of International Affairs
USDA-FSIS
Washington, DC 20250

Dear Mr. Hawkins,

Please find enclosed a letter from the Federal Ministry for Health, Family and Youth (BMGFJ) of Austria dating from January 7, 2009 regarding the onsite audit conducted from September 15 to September 2008 in Austria.

With my best regards,


Andreas Somogyi

Enclosure



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Fax:

Reference number:

Date:

Your reference number:

BMGFJ - IV/B/4 (Food Safety and
Inspection Service for Meat
Production, Primary Production
and Animal By-products)

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BMGFJ-74440/0314-IV/B/4/2008

2.1.2009

Response to the Draft Final Audit Report

Dear Mr. Acting Director Hawkins,

The Federal Ministry for Health, Family and Youth thanks you for sending Draft Final Audit Report regarding the onsite audit conducted from September 15 to September 2008 in Austria.

The Republic of Austria does not have any comment on the Draft final Audit Report.

For the Federal Minister:
Ulrich Herzog

Attachement 0:

Transmitted electronically