Audits – *VERIFYING EQUIVALENCE*

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INTRODUCTION

Meat, Poultry and egg products imported into the United States must achieve the same Appropriate Level of Protection (ALOP) as products produced in the United States.

INTRODUCTION

- **FSIS regulations provide the authority and basis for conducting audits of foreign inspection systems.**

- **Requirements center around five risk areas of a foreign country's inspection system controls:**
  - **Animal Disease Controls**
  - **Sanitation Controls**
  - **Slaughter/Processing Controls**
  - **Residue Controls**
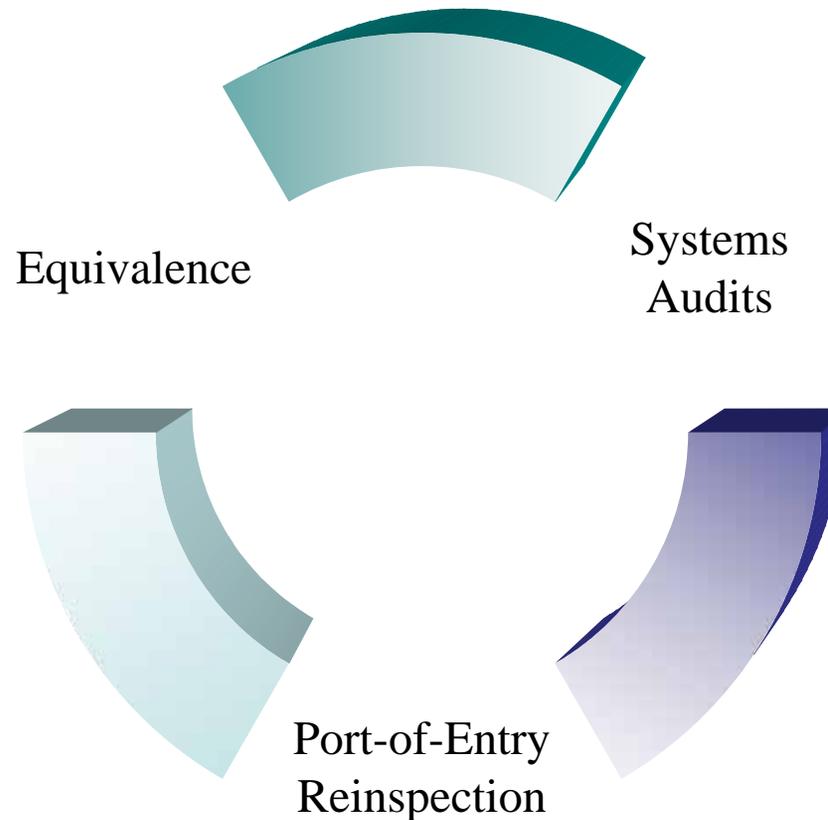 - **Government Oversight/Enforcement**

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SYSTEMS AUDIT

FSIS achieves this regulatory responsibility by conducting a <u>systems audit</u> to evaluate an exporting country's inspection system controls.

FSIS works directly with each foreign country's inspection management officials in our "government to government" approach.

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Systems audits represent one-third of FSIS' triad of protection.

TRIAD APPROACH

Equivalence

Systems Audits

Port-of-Entry Reinspection

AUDITS

Systems Audits help verify that a country is maintaining equivalence and achieving the ALOP of the United States.

AUDITS

CURRENT PROCESS

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AUDITS - Current

- **Audits are conducted on an annual basis.**

- **Audits have two principle sub-elements:**
  - **In-country evaluation**
  - **Out-of-country evaluation**

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AUDITS - Current

In-Country Evaluation

- **Standardized approach of verifying a country's competent authority's implementation and oversight of its food safety system.**

- **Includes a review of establishments certified to export to the U.S., government offices providing enforcement activities, and laboratories performing analytical testing.**

AUDITS - Current

In-Country Evaluation

- **Assignment of countries is rotated among auditors.**

- **More than one auditor can, and is, used for countries with a larger population of establishments certified to export to the U.S.**

AUDITS - Current

Out-of-Country Evaluation

Before conducting an in-country evaluation, the auditor reviews and analyzes the following information:

- Prior audit results for the past three years.
- Types and amount of products exported to the U.S.
- Port-of-entry reinspection results.
- Consumer Complaints.

AUDITS - Current

(continued)

– **Third country audit results (e.g., EU).**

– **APHIS restrictions.**

– **Equivalence determinations since last audit.**

– **Other information relevant to the country.**

AUDITS - Current

- **The information that the auditor has collected is used as a basis to determine the <u>scope</u> of the audit.**
  - **Combination of statistical chart, history, and other available information to determine the number of establishments.**
  - **Evaluation of available data to determine number of laboratories and degree of government oversight/enforcement.**

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AUDITS

FUTURE PROCESS

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AUDITS - Future

- **Exporting countries do not need to be audited in the same manner or frequency to verify continuing equivalence. This is based on:**
  - **Countries are not the same with respect to the degree of inspection system controls;**
  - **FSIS' level of confidence in a country's ability to maintain an equivalent system can vary from one country to another.**

AUDITS - Future

FSIS is examining different ways to verify that a country is maintaining an equivalent system:

- **Audits could be carried out either during a visit to the exporting country or a desk audit, or a combination of both.**

- **Both desk audits and in-country audits would emphasize system controls.**

AUDITS - Future

- **Some countries have the ability to provide FSIS with information/data regarding their inspection activities and other system-control measures on a continuous basis (365-day audit aspect)**

- **FSIS believes it can use this information to supplement evaluation of the activities & effectiveness of foreign inspection programs.**

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AUDITS - Future

- **A standardized approach that must be objective-based.**

- **FSIS would verify accuracy of the information provided during the on-site audit activity.**

AUDITS - Future

- **The scope and timing of an on-site verification audit for any country will consider:**
  - **Volume of product shipped to the U.S.**
  - **Types of product shipped and the associated risk.**
  - **All available historical information.**
  - **Analysis of information provided by country.**

AUDITS - Future

Some factors that FSIS is considering:

- **What types of information should FSIS ask a country to provide on an ongoing basis?**

AUDITS - Future

Some factors that FSIS is considering:

- **Should the length of time between on-site audits vary according to compliance history?**

AUDITS - Future

Some factors that FSIS is considering:

- **Should the scope of on-site audits vary according to compliance history?**

THANK YOU

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