Importing Meat, Poultry and Egg Products Into the United States

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Collaborative Food Safety Forum
Imports Session
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FSIS Mission

As the public health regulatory agency in USDA, FSIS is responsible for ensuring that the nation's commercial supply of **meat**, **poultry**, and processed **egg products** is:

- Safe
- Wholesome
- Correctly labeled and packaged
FSIS Authority

- Federal Meat Inspection Act (FMIA)
- Poultry Products Inspection Act (PPIA)
- Egg Products Inspection Act (EPIA)
Title 9 of the Code of Federal Regulations

- Parts 300 – 500 – Meat [cattle, sheep, swine, and goats], Rabbits, Mules, and Horses

- Parts 362, 381 – Poultry [domesticated birds - chickens, turkeys, ducks, geese, guineas, ratites, and squabs]

- Parts 590, 592 – Egg Products

- FSIS implemented equivalence in 1995 amendment to these regulations
FSIS Jurisdiction

What

- Amenable foods generally contain significant portions of meat, poultry, and processed eggs products (e.g. 3% not ready to eat (NRTE) or 2% ready to eat (RTE) portions)
  - FDA amenable foods are other than FSIS foods

How

- Mark of inspection is placed on all product as not adulterated or misbranded before release of product into commerce
  - FDA makes a determination regarding adulteration and misbranding generally after product is in commerce
### U.S. HEALTHY PEOPLE 2010; 2020

<table>
<thead>
<tr>
<th>Pathogen</th>
<th>1997</th>
<th>2006-2008</th>
<th>2010 FoodNet Case Rate</th>
<th>HP2010; 2020* Target</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Campylobacter</strong></td>
<td>24.6</td>
<td>12.71</td>
<td>13.6</td>
<td>12.3; 8.5</td>
</tr>
<tr>
<td><strong>E. coli O157:H7</strong></td>
<td>2.1</td>
<td>1.2</td>
<td>0.9***</td>
<td>1.0;0.6</td>
</tr>
<tr>
<td><strong>L. monocytogenes</strong></td>
<td>0.47</td>
<td>0.29</td>
<td>0.3</td>
<td>0.24; 0.2****</td>
</tr>
<tr>
<td><strong>Salmonella</strong></td>
<td>13.6</td>
<td>15.25</td>
<td>17.6</td>
<td>6.8;11.4</td>
</tr>
</tbody>
</table>

- *CDC MMWR – June 2010, 60(22): 749-755*
- **Minor revisions were made in some case rates in November 2000**
- ***First met in 2004 and then again in 2009 and 2010; CDC tracks non-O157 STEC and for 2010, the case rate was 1.0***
- ****Changed to year 2005 by Presidential Executive Order***
### Pathogen-Specific Illness Estimates for FSIS Foods

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Salmonella</em></td>
<td>576,436</td>
<td>553,379</td>
<td>531,574</td>
</tr>
<tr>
<td><em>E. coli O157:H7</em></td>
<td>20,415</td>
<td>16,984</td>
<td>16,315</td>
</tr>
<tr>
<td><em>Listeria monocytogenes</em></td>
<td>1,236</td>
<td>1,043</td>
<td>1,002</td>
</tr>
<tr>
<td>All Illness</td>
<td>598,087</td>
<td>571,406</td>
<td>548,890</td>
</tr>
</tbody>
</table>

1: In July 2011, FSIS will begin a *Campylobacter* verification testing program. Illnesses associated with this pathogen will be incorporated into this table.
2: FSIS will adjust its performance standards to reflect new Healthy People 2020 goals.
Foreign Country Eligibility

- Equivalence—the concept that different sanitary measures may be used to achieve the same level of food safety

- Equivalence evaluations of foreign meat, poultry, and/or egg products regulatory systems are a prerequisite for trade
FSIS Regulated Imports

- In FY 2010, the United States imported 3.2 billion pounds of meat and poultry products from 29 [out of 34] eligible foreign countries and 22.4 million pounds of egg products from Canada.
Equivalence Process

- In order to be eligible to export to U.S., FSIS must deem a country’s food safety system equivalent to U.S. system
  - Initial review of country’s laws and regulations
  - Initial on-site country audit

- To ensure continued safety and wholesomeness of products, FSIS conducts:
  - Recurring review of laws and regulations
  - Recurring equivalence verification audits
  - Ongoing point-of-entry (POE) reinspections
Foreign Country Eligibility

Eligible foreign countries are published in the Code of Federal Regulations

- 9 CFR 327.2 for meat
- 9 CFR 381.196 for poultry
- 9 CFR 590.910 for egg products

Equivalent foreign countries’ inspection systems certify individual exporting establishments
Equivalence Process

- FSIS’ Self-Reporting Tool is used to maintain up-to-date information related to the eligible country’s system.
- Performance based analysis is used to determine the scope and frequency of an on-site audit.
- Point-of-entry re-inspection activities monitor the effectiveness of the foreign inspection system’s food safety programs.
Equivalence Process

Data Sources
- On-site audits: Government offices
- On-site audits: Establishments
- On-site audits: Laboratories
- POE reinspection findings

Equivalence Components
- Government oversight
- Statutory authority/regs
- Sanitation
- HACCP systems
- Pathogen testing programs
- Residue testing programs

Country Performance Score
- Develop country-specific measure for each data source/equivalence component combination
- Derive composite performance score for each eligible country
Country Performance Assessment

- Assess each country’s food safety performance (high, medium, low)
  - Composite measure of country’s food safety performance relative to other eligible countries

- Use country performance to determine:
  - Scope of on-site audits
  - Frequency of POE reinspections
Country Performance Score

High Performance
- Smallest scope of audits
- Lowest frequency of POE activities

Medium Performance
- Normal scope of audits
- Normal frequency of POE activities

Low Performance
- Greatest scope of audits
- Highest frequency of POE activities
Equivalence Verification Audits

- Recurring Audits
- Reinspections
- Reviews of Country’s Laws and Regulations
FSIS Import Reinspection

- After an incoming shipment has met U.S. Customs & Border Protection and APHIS requirements, the shipment must be re-inspected at an FSIS approved import inspection facility prior to release into commerce.

- About 65 FSIS Inspectors stationed at 33 major ports verify every shipment and randomly perform in-depth types-of-inspections.
FSIS Import Flow Chart

Eligible Country

Eligible Foreign Establishment

Foreign Product Arrives at POE

Broker files entry

CBP APHIS

Broker/Importer applies for FSIS reinspection (Form 9540-1)

Data entry into AIIS

Product moves to I-HOUSE

Import Re-Inspection:
- Document check; general condition; transportation damage; labeling; box count
- AIIS verifies APHIS/VS requirements; eligibility of country/production establishment
- Product Exams, COC, Net Wt., Laboratory Sampling,

Accept

Results entered into AIIS

Reject

Notify CBP and Broker (FSIS Form 9840-3)

Stamp Product “US Inspected & Passed”

Release product into commerce

Stamp Product “U. S. Refused Entry”

Dispose of Product:
- Destruction
- Convert to Animal Food
- Re-Export

Maintain case file at I-house

FSIS Form 9540-1, Foreign HC, and all other documentation applicable to the shipment.

Advanced notification of Canadian shipment
Automated Import Information System (AIIS)

- POE sampling includes a series of checks on a country’s food safety system
- Centralized computer database that generates TOI (Type of Inspection) and stores inspection results
  - Links ports of entry
  - Tracks results from each country
  - Tracks results from each establishment
## POE Verifications and Reinspections

<table>
<thead>
<tr>
<th>POE Verifications (All shipments)</th>
<th>POE Reinspections (AIIS) (Normal/increased/intensified)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eligible country</td>
<td>Product exams</td>
</tr>
<tr>
<td>Eligible establishment</td>
<td>- Boneless meats/cuts</td>
</tr>
<tr>
<td>Eligible product</td>
<td>- Canned and packaged</td>
</tr>
<tr>
<td>Proper certification</td>
<td>- Organs</td>
</tr>
<tr>
<td>Transportation damage</td>
<td>Laboratory sampling</td>
</tr>
<tr>
<td>Proper labeling</td>
<td>- Pathogens</td>
</tr>
<tr>
<td>Shipping marks</td>
<td>- Food chemistry</td>
</tr>
<tr>
<td>General condition</td>
<td>- Species</td>
</tr>
<tr>
<td>Box count</td>
<td>- Residues</td>
</tr>
</tbody>
</table>

**Refused Entry**
Sample Selection

- Frequency of product examinations are based on:
  - Exporting country
  - Process category
  - Species
  - Country performance
    - Composite performance factor
    - POE physical failure factor

- Frequency of microbiological testing
- Frequency of residue testing
Sample Selection—Product Examination

<table>
<thead>
<tr>
<th>Average Annual Number of Lots Presented</th>
<th>Initial Sample Size</th>
<th>Approx Fraction of Nonconforming Lots Detected (95 % Conf)</th>
</tr>
</thead>
<tbody>
<tr>
<td>6,000 or more</td>
<td>600</td>
<td>0.005</td>
</tr>
<tr>
<td>3,000 – 5,999</td>
<td>300</td>
<td>0.01</td>
</tr>
<tr>
<td>1,000 – 2,999</td>
<td>150</td>
<td>0.02</td>
</tr>
<tr>
<td>300 – 999</td>
<td>60</td>
<td>0.05</td>
</tr>
<tr>
<td>60 – 299</td>
<td>30</td>
<td>0.10</td>
</tr>
<tr>
<td>14 – 59</td>
<td>One-half of lots</td>
<td>---</td>
</tr>
<tr>
<td>13 or less</td>
<td>All lots</td>
<td>---</td>
</tr>
</tbody>
</table>

2. Approximate fraction of nonconforming lots estimated using the hypergeometric distribution.
FSIS Microbiological Sampling Programs for Imported Products

- **E. coli O157:H7 sampling**
  - Raw ground beef (MT08)
  - Raw, non-intact beef (MT51)

- **Ready-To-Eat (IMVRTE) sampling**
  - Salmonella
  - Listeria monocytogenes (Lm)

- **Processed Egg Products sampling**
  - Salmonella
## FSIS Sampling Programs for Imported Products (FY 2010)

<table>
<thead>
<tr>
<th>Pathogen</th>
<th>Product Type/Class</th>
<th>Sampling Project</th>
<th>Number of Samples Scheduled</th>
<th>Total Number of Samples Analyzed (Failures)</th>
<th>Program Achievement</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>E. coli</em> O157:H7</td>
<td>Imported raw ground beef</td>
<td>MT08</td>
<td>23</td>
<td>23 (1)</td>
<td>Monitors foreign inspection program to ensure safety of imported product</td>
</tr>
<tr>
<td><em>E. coli</em> O157:H7</td>
<td>Trim and other raw ground beef components</td>
<td>MT51</td>
<td>695 Including follow-up samples</td>
<td>695 (2)</td>
<td>Monitors foreign inspection program to ensure safety of imported product</td>
</tr>
<tr>
<td>Salmonella and Lm</td>
<td>Imported Intact RTE Product</td>
<td>IMVRTE</td>
<td>4,512 Including follow-up samples</td>
<td>4,512 (3)</td>
<td>Monitors foreign inspection program to ensure safety of imported product</td>
</tr>
<tr>
<td>Salmonella</td>
<td>Pasteurized imported liquid, frozen or dried products</td>
<td>EGGIMP</td>
<td>TBD</td>
<td>74 (0)</td>
<td>Monitors foreign inspection program to ensure safety of imported product</td>
</tr>
</tbody>
</table>
FSIS Import Reinspection

- Outside containers of imported meat, poultry and egg products that pass FSIS reinspection are stamped with the “Official Inspection Legend”* and are allowed to enter U.S. commerce for distribution and use as if they were produced domestically.

*Except for Canadian product
Outside containers of imported meat, poultry and egg products that fail to meet U.S. requirements are stamped “United States Refused Entry” and within 45 days:
- Must be exported from the US
- Destroyed, or
- Converted to animal food
  - With the approval of the Food and Drug Administration (FDA)
FSIS Import Enforcement - ISLOs

- FSIS’ 20 Import Surveillance Liaison Officers (ISLOs) are focused on enforcement at port-of-entry
  - Conduct surveillance activities of land, seaport and airport facilities where meat, poultry and egg products may be handled, stored or distributed
  - Maintain vigilance to detect evidence of product tampering or intentional contamination that would threaten the imported food supply

- Between FY 2005 to FY 2010, approximately 12 million pounds of ineligible product was detected, detained, removed from commerce, or brought back into compliance by FSIS
Performance-Based Approach

- Focus resources on products expected to pose the greatest health threat
- Improve linkage between foreign country audit findings and POE reinspections
- Increase harmonization of domestic and international approaches
References

United States Department of Agriculture
Food Safety and Inspection Service

http://www.fsis.usda.gov/