



MEAT IMPORTERS COUNCIL OF AMERICA, INC.

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Laurie I. Bryant
Executive Director

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Memo to: MICA Members

Re: HACCP Letters and Third Party Audits

HACCP Letters

There continue to be requests from end users for updated HACCP letters to be provided by overseas suppliers. In many cases the reason given for the request has been that they are required by their FSIS inspector in order to receive approval of their HACCP plans.

It is my understanding that updated letters are not required because one of the conditions that must be met for an overseas packer to continue to be approved to export meat to the US is that they must review their HACCP plans on an annual basis or risk being delisted. This requirement is enforced by the competent authority in the supplying country and annual audits of the foreign country's inspection system are undertaken by FSIS to ensure that these conditions and other requirements are being met. These audits include onsite visits to a number of plants as well as reviews of documentation etc.

Third Party Audits

Another issue that has been brought to my attention has been end user requests for third party audits of overseas packers and again it would appear that this request is sometimes being advised as an FSIS requirement to receive approval of the company's HACCP plan.

As with the request for updated HACCP letter it is my understanding that third party audits are not an FSIS requirement for overseas suppliers. However, end users may choose to require these as part of their HACCP plans but that would appear to be a commercial issue not an FSIS one.

The extent of oversight of foreign meat supplies through inspection in the country of origin, which must be deemed equivalent to the US inspection system, followed by FSIS audits and then re-inspection at the point of entry means that there is much greater scrutiny of imported meat than there is for domestic product.

In the event that your customer is being advised by an inspector that these are required I would suggest that this be discussed with the district or regional supervisor to seek clarification. In the event that this does not resolve the issue then let me know the details of the issue and I will discuss it with the appropriate people in the FSIS office in Washington DC to seek clarification.