United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

MAR 15 2007

Dr. Nelmon Oliveira da Costa
Director, Department of Inspection
for Products of Animal Origin
Ministry of Agriculture and Provisions
Division of International Commerce Control
Ministry of Agriculture Annex
Block D, 4th Floor, Room 436A
70043-900 Brasilia DF, Brazil

Dear Dr. da Costa:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Brazil's meat inspection system on August 16 to September 12, 2006. Comments from Brazil have been included as an attachment to the final report. Enclosed is a copy of the final report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 720-3781, at (202) 690-4040 or electronic mail at sally.white@fsis.usda.gov.

Sincerely,

Sally White JD

Sally White, Director
International Equivalence Staff
Office of International Affairs

Enclosure

FINAL

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

August 16 through September 12, 2006

Food Safety and Inspection Service
United States Department of Agriculture

TABLE OF CONTENTS

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority (the Department of Inspection of Products of Animal Origin (DIPOA)
DIPOA	Department of Inspection of Products of Animal Origin
E. coli	*Escherichia coli*
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
Salmonella	*Salmonella* species
SFA	Federal Superintendent for Agriculture, Livestock and Supply Office at State Level
SIPAG	Federal Service of Inspection of Products of Animal Origin at the State Level
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedures
UTRA	Reginal Technical Units of Agriculture, Livestock, and Supply

1. INTRODUCTION

The audit took place in Brazil from August 16 through September 12, 2006.

An opening meeting was held on August 16, 2006, in Brasilia with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the audit itinerary, and requested additional information needed to complete the audit of Brazil's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the Department of Inspection of Products of Animal Origin [Departamento de Inspeção de Produtos de Origem Animal (DIPOA)] and/or representatives from the Service of Federal Inspection of Products of Animal Origin at the State Level [Servicio de Inspeção de Produtos de Origem Animal (SIPAG)].

2. OBJECTIVE OF THE AUDIT

This audit was a routine annual audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter and processing establishments certified by the CCA as eligible to export meat products to the United States (U.S.).

In pursuit of the objective, the following sites were visited: the headquarters of DIPOA, located in Brasilia, two SIPAG Offices located in two Federal Agriculture Offices at the State Level (Goias and Sao Paulo), one private microbiological testing laboratory, two meat processing establishments, and six meat slaughter and processing establishments.

Competent Authority Visits			**Comments**
Competent Authority	Headquarters	1	Brasilia
	SIPAG	2	Federal Agricultural Offices at the State level
Microbiology Laboratory		1	
Meat Processing Establishments		2	
Meat Slaughter and Processing Establishments		6	

3. 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 at the CCA and two SIPAG Offices. The third part involved on-site visits to eight establishments: six slaughter and processing establishments, and two processing establishments. The fourth part involved a visit to one private microbiology laboratory, Department of Inspection of Products of Animal Origin, FAMATO, located in Varzea (Cuiaba), Mato Grosso. The laboratory provides laboratory support for establishments certified for United States (U.S.) export.

Program effectiveness determinations of Brazil's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP) and Sanitation Performance Standards (SPS), (2) animal disease controls, including the requirements for Bovine Spongiform Encephalopathy, (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems, a testing program for generic *E. coli*, and a testing program for Ready-to-Eat products, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella* in raw products, daily inspection, monthly reviews, and inspection system controls. Brazil's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment audits, 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 Brazil 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 officials that Brazil's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Brazil. FSIS requirements include, among other things, daily inspection in all certified establishments, supervisory monthly reviews of certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, 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 generic *E. coli, Salmonella*, and government oversight/enforcement activities.

The auditor would audit against any Equivalence determinations that have been made by FSIS for Brazil under provisions of the Sanitary/Phytosanitary Agreement. Brazil has adopted the FSIS regulatory requirements for *Salmonella* testing for raw products with the exception of the following equivalent measures:

- Establishment employees collect samples.
- Private laboratories analyze samples.
- An establishment is suspended the first time it fails to meet a *Salmonella* performance standard.
- Brazil is exempt from testing for species.

4. 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 U.S. import requirements listed in 9 CFR 327 and the Pathogen Reduction/HACCP regulations.

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address: http:/www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp

During the July 2005 audit, it was found that Brazil did not have an effective training strategy to implement new inspection programs and FSIS laboratory methodologies and procedures. The inspection officials did not demonstrate a clear understanding and practical application of FSIS Directive 5000.1, rev 1, competency, and skills to properly execute the new inspection programs.

The laboratory personnel who will implement FSIS laboratory methods and procedures had no clear understanding of FSIS laboratory methods and procedures. Three of the five microbiology laboratories audited in July 2005 did not meet good laboratory practice requirements.

Of the eight establishments audited in July 2005, one received a Notice of Intent to Delist (NOID) for significant deficiencies in SPS requirements. No deficiencies that would affect food safety were observed in the remaining seven establishments.

During the October/November audit even though the CCA has implemented the new supervisory monthly review and auditing procedures in all Federal State Offices, a Veterinary Medical Officer (VMO) in charge of one establishment may be assigned to a different establishment to perform supervisory monthly reviews, including assessing and evaluating job performance of other VMOs in charge. This arrangement may not provide effective and objective supervisory monthly reviews and may create a conflict of interest.

The CCA did not provide effective laboratory oversight. None of the four microbiology laboratories for FSIS audit were audited by the CCA since the last FSIS audit in July 2005. As a result, one of the microbiology laboratories had to be removed from testing of U.S. product.

Although elements of FSIS Directive 5000.1, revision 1 were implemented in establishments certified for U.S. export, one establishment received a NOID for significant deficiencies in SSOP and SPS requirements and in two establishments, HACCP on-going requirements regarding recordkeeping were not met.

Establishments audited during the July and October/November 2005 audits had implemented corrective actions to address the deficiencies identified in the March/April 2005 audit.

MAIN FINDINGS

6.1 Government Oversight

DIPOA is under the Ministry of Agriculture, Livestock and Supply. The Director of DIPOA reports to the office of the Agriculture and Livestock Defense Secretariat which is equivalent to USDA's Under Secretary for Food Safety. DIPOA, Brazil's CCA, is responsible for providing government oversight of Brazil's meat inspection program. The International Export and Import Programs Coordnation Division is one of the offices in DIPOA and it has broad responsibilities: develop and manage export and import programs and policies including auditing procedures and certification of new establishments; manage the regulation and rule making process; develop and manage field implementation strategies for FSIS food safety requirements; and coordinate field inspection activities nationwide.

Each state in Brazil has a Superintendent for the Federal Agriculture Office (SFA) at the State Level. Federal Superintendents, are polical appointees of the Minister of Agriculture. On June 16, 2005 Ministry order Number 300 was issued creating the stucture of SIPAG. SIPAG Offices operate within the scope of the national organization of inspection operations coordinated by DIPOA and are responsible for the coordination and performance of inspection operations in the establishments located within the State.

In addition, there are Regional Offices operating within the States, Reginal Technical Units of Agriculture, Livestock, and Supplies (UTRA). UTRA Offices were established beginning March 28, 2006, in the State of Sao Paulo, to support the activies of SFA and their units for the collection and processing of data in relation to inspection, livestock protection and also to furnish supplies, transportation and staffing for SIPAG Offices. Others States are in the process of establishing UTRA Offices as needs of the States are identified and resources are approved. UTRA Offices are stictly administrative and have no supervisory or regulatory oversight functions.

6.1.1 CCA Control Systems

No deficiencies were observed in organizational structure.

6.1.2 Ultimate Control and Supervision

Audit standards and audit procedures have been implemented by the CCA for the auditing of the State supervisor of each establishment and for the auditing of the State oversight system. The CCA will audit 40 percent of all U.S. certified establishments once a year. Audits of SIPAG offices and all U.S. certified establishments were conducted in February and August of 2006. Elements of FSIS Directive 5000.1, rev 1 are used to conduct verification activities in establishments certified for U.S. export. Supervisory monthly reviews including assessing and evaluating job performance of other veterinary inspectors in charge are conducted by State supervisors that are not assigned as a veterinarian in charge of U.S. certified establishments with in the same State. State supervisors could have other responsibilities such as responsibilities within a SIPAG Office, assigned as a Chief of a Regional Office, UTRA, or as a VMO in charge of an

establishment and located in another State. However, in all SIPAG Offices, a VMO in charge of one establishment will not be assigned to a different establishment, with in the same State, to perform supervisory monthly reviews including assessing and evaluating job performance. This arrangement should eliminate any conflict of interest issues identified during the October/November 2005 audit.

6.1.3 Assignment of Competent, Qualified Inspectors

The CCA has conducted training and implemented new inspection programs. The entire veterinary inspection staff has received some type of ISO 9000 audit principles training. In the first half of 2006 two types of training for audits and auditors had been conducted. Training was organized and conducted in four States: Sao Paulo, Minas Gerais, Mato Grosso do Sul, and Goias. Training concentrated on re-enforcement training for Directive 5000.1 Revision 1 (Circulars 175 and 176) and traceability. In the second half of 2006 the entire inspection staff working within the establishments is scheduled for training.

6.1.4 Authority and Responsibility to Enforce the Laws

The sanitation, slaughter and processing inspection procedures and standards and legal authority to enforce these requirements are outlined and specified in a Brazil inspection law referred to as RIISPOA. The CCA has the authority and responsibility to enforce the inspection laws, and it has developed new inspection policies and procedures by adopting FSIS inspection procedures to ensure effective enforcement of U.S. requirements. Circular 540/2006, implemented August 8, 2006 provides SIPAG with the authority to issue fines and other penalties to establishments for repetitive nonconformances identified by the State Supervisor during monthly supervisory reviews.

Although Brazil has the authority and responsibility to enforce FSIS requirements, one establishment received a NOID.

- A NOID was issued for failure to consider stabilization performance standards in the hazard analysis. The establishment demonstrated lack of process control by producing product destined for export to the U.S. with an inadequate HACCP plan.

6.1.5 Adequate Administrative and Technical Support

DIPOA has adequate administrative and technical support to operate Brazil's inspection system. DIPOA auditors conducted audits of SIPAG Offices and U.S. certified establishments in February and August of 2006.

FSIS laboratory methodologies have been transmitted into Brazilian law. The CCA published in the Brazilian Federal Register, Normative Instructional number 40, December 16, 2005. Normative Instructional number 40 transmits FSIS laboratory methodologies into Brazilian law. Thirty laboratory personnel were trained in FSIS laboratory methodologies. One government and four private microbiology laboratories were audited by a trained auditor from DIPOA in May and August of 2006. Internal

laboratory audits are scheduled to be conducted two times a year. The first of scheduled internal audits of microbiological laboratories was conducted February 14, 2006.

6.2 Headquarters Audit

The FSIS auditor interviewed inspection officials to assess whether the CCA had implemented inspection programs, training programs and laboratory corrective actions, including implementation of U.S laboratory methodologies. Various supporting records and documents related to inspection programs and policies were examined to confirm CCA officials' responses. Records reviewed were:

- Internal review reports.
- Training records for inspectors
- Training programs for inspection personnel.
- DIPOA audit protocols, reports and training of auditors.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Microbiology sampling and laboratory analyses for residues.
- Equivalence determinations.
- Export product inspection and control.
- Microbiology laboratory audits and training programs.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with disease conditions and of inedible and condemned materials.
- Guidelines for testing for *Salmonella* in raw product.

Any concerns identified as a result of the examination of these documents will be reported in other sections of this report.

6.3. Audit of State and Local Inspection Offices

SIPAG Offices are responsible for direct implementation of U.S. requirements and inspection oversight activities over establishments certified for U.S. export. The auditor conducted reviews of two SIPAG Offices located in Sao Paulo and Goiana and inspection offices at each establishment audited to assess the effectiveness of delivery and implementation of inspection programs. The Superintendent of each SIPAG Office and the VMO in charge of each eastablishment audited was interviewed the following records were reviewed:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors.
- Training programs for inspection personnel.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with disease conditions and of inedible and condemned materials.

- Export product inspection and control.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.
- Microbiology sampling and laboratory analyses for residues.
- Inspection records which included verification of the establishment's HACCP, SSOP and SPS programs.
- Guidelines for testing for *Salmonella* in raw product.
- New laws and implementation documents such as regulations, notices, directives and guidelines.

Any concerns identified as a result the examination of these documents will be reported in other sections of this report.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of eight establishments. Six were slaughter and processing establishments and two were processing establishments. No establishments were delisted by Brazil. One establishment received a NOID from DIOPA for failure to consider stabilization performance standards in their hazard analysis. The establishment demonstrated lack of process control by producing product destined for export to the U.S. with an inadequate HACCP plan. This establishment may retain their certification for export to the U.S. provided that they correct all deficiencies noted during the audit within 30 days of the date the establishment was reviewed. No deficiencies that would affect food safety were observed in the remaining seven establishments.

Specific deficiencies are noted on the attached individual establishment reports.

Four of the eight establishments audited during the current August/September 2006 audit, had been identified with deficiencies in previous audits. The four establishments had implemented corrective actions to address the deficiencies.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis was placed on the application of procedures and standards that are equivalent to U.S. 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.

No residue laboratories were audited.

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 United States samples, the auditor evaluated compliance with the criteria established for the use of private laboratories under the PR/HACCP requirements. The following laboratory was audited:

- One private microbiology laboratory, FAMATO, located in Varzea (Cuiaba), Mato Grosso.

FAMATO was conducting microbiological carcass sponge sample analysis for *Salmonella* and generic *E. coli* on product destined for export to the U.S. Audit findings identified during the October/November 2005 audit had been corrected. U.S. laboratory methodologies had been implemented and media lot identification was included in the media preparation records.

No deficiencies were noted.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focuses on five areas of risk to assess an exporting country'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, Brazil'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 addition, and except as noted below, Brazil'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.

9.1 SSOP

All eight establishments selected for audit were evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States' domestic inspection program. The SSOP in the establishments audited were found to meet FSIS regulatory requirements, with the following exceptions:

- In one establishment, written procedures had not included in their SSOP, SOP or prerequisite programs documenting the process of reconditioning meat that had been dropped onto the deboning room floor.

9.2 SPS

All eight establishments selected for audit were evaluated to determine if the FSIS regulatory requirements for SPS were met according to the criteria employed in the United States' domestic inspection program. The SPS in the establishments audited were found to meet FSIS regulatory requirements, with the following exception:

- In one establishment, the floors and walls of the raw tripe offal room were not maintained in a manner sufficient to prevent the creation of insanitary conditions. The grouting between tiles in several areas of the walls, floor and around the floor drain was missing. Equipment had been removed from the walls of the offal room, but the holes remaining in the walls used to mount the equipment had not been sealed.

10. 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, procedures for sanitary handling of returned, reconditioned product and the implementation of the requirements for the control of Bovine Spongiform Encephalopathy. The auditor determined that Brazil's inspection system had adequate controls in place. No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

11. 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: humane handling and slaughter of animals, ante-mortem inspection procedures; ante-mortem disposition; 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, implementation of a generic *E. coli* testing program in slaughter establishments, and a testing program for ready-to-eat products.

11.1 Humane Handling and Slaughter

No deficiencies were observed.

11.2 HACCP Implementation.

All eight establishments selected for audit 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.

The HACCP programs were reviewed during the on-site audit of eight establishments. Although the HACCP plans in the eight establishments were found to meet the basic FSIS regulatory requirements, it was found that two of the eight establishments had not adequately implemented their HACCP plans. Examples of these deficiencies include:

- In two establishments, the contents of the HACCP plan did not include all required components.
    - The number of cans to be sampled for CCP-4 B was not described in the HACCP plan, in records documenting the measurement of the critical limit or in monitoring procedures.
    - The stabilization process for cooked roast beef was not considered in the hazard analysis. *Clostridium perfringens* was considered as a hazard reasonable likely to occur in the chilling process, but the establishment did not consider chilling time. The establishment considered the temperature of the finished product (-18^{O}C), but not in relationship to the time interval from the end of the cooking cycle ($\geq$80^{O}C) to the end of the chilling cycle ($\leq$4.4^{O}C).

- In one establishment, the validation of processing procedures was not conducted properly.
    - The establishment did not present supporting documentation to demonstrate how their cooked roast beef process met stabilization performance standards.
    - Control point records documenting the chilling process for fully cooked roast beef, documented lack of process control for the chilling process. Records documented that stabilization performance standards were not met and the cooked roast beef HACCP plan was inadequate.

- In two establishments, HACCP on-going requirements regarding recordkeeping were not met:
    - Results for the measurement of critical limits for CCP-4B were not recorded at the time the actual results were measured.
    - Supporting documentation furnished for the chilling of cooked roast beef did not support decisions made for the chilling process in the HACCP plan, in the SSOP, or in prerequisite programs.

11.3 Testing for Generic *E. coli*

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

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

Testing for generic *E. coli* was properly conducted in the six slaughter establishments audited.

11.4 Testing of RTE Products

Four of eight establishments audited were producing ready-to-eat products eligible for export to the U.S. The four establishments met FSIS *Listeria* requirements.

12. 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.

There were no residue laboratories audited.

Brazil's National Residue Control Program for 2006 was being followed and was on schedule.

13. 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, the testing program for *Salmonella* in raw products, daily inspection, monthly reviews, and inspection system controls.

13.1 Daily Inspection in Establishments

Daily inspection was provided as required for all establishments audited.

13.2 Testing for *Salmonella* in Raw Product

Six establishments were required to meet the basic FSIS regulatory requirements for *Salmonella* testing. Brazil has adopted the FSIS requirements for *Salmonella* testing with the exception of the following equivalent measures:

- Establishment employees collect samples.
- Samples are analyzed in private laboratories
- Brazil suspends an establishment the first time it fails to meet a *Salmonella* performance standard in raw product.

The following deficiency was observed:

- DIPOA is currently suspending an establishment's ability to export to the U.S. after the establishment fails to meet the *Salmonella* Performance Standards on the third consecutive series of tests.

13.3 Species Verification

Brazil is exempt from species verification testing and no deficiencies were observed.

13.4 Monthly Reviews

In the eight establishments audited, monthly supervisory reviews were being performed and documented as required.

No deficiencies were observed.

13.5 Inspection System Controls

The CCA was required to demonstrate that all government inspectors assigned to establishments certified for U.S. export were being paid by the government. The CCA continues to utilize veterinary inspectors and non-veterinary agents that are employed by municipalities. The system to convert all veterinary inspectors and agents to Ministry of Agriculture employees was delayed by legal actions surrounding the process of announcing the positions and scheduling simultaneous testing of applicants. This problem is in the process of being resolved. Records of payment of inspectors and other conflict of interest issues were reviewed and no deficiencies were observed.

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 U.S. 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 counties for further processing

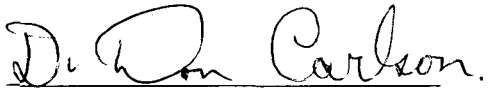
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on September 12, 2006, in Sao Paulo with the CCA. At this meeting, the preliminary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. Don Carlson
Senior Program Auditor



15. ATTACHMENTS

Individual Foreign Establishment Audit Forms
Foreign Country Response to Draft Final Audit Report

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Independencia Alimentos Ltd. Nova Andradina Mato Grosso Do Sul (MS)	09/06/2006	SIF 0049	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Don Carlson		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Brazil Est. SIF 0049 Date: 09/06/2006 Slaughter/Processing
Independencia Alimentos Ltd.
Nova Andradina
Mato Grosso Do Sul (MS)

13/51. The establishment had not included written procedures in their SSOP, SOP or prerequisite programs documenting the process of reconditioning meat that had been dropped onto the deboning room floor. The establishment had established procedures for meat dropped onto the floor, but had not document the procedures, or as an alternative, documented each piece of meat that had dropped onto the floor and had been reconditioned.
[9 CFR 416.12, 416.16 and 416.17]

39/51. The floors and walls of the raw tripe offal room were not maintained in a manner sufficient to prevent the creation of insanitary conditions. The grouting between tiles in several areas of the walls, floor and around the floor drain was missing. These areas were not sealed sufficiently to prevent water and product residue from accumulating in these areas and therefore creating insanitary conditions. Equipment had been removed from the walls of the offal room, but the holes remaining in the wall used to mount the equipment had not been sealed. This area had not been identified for repair in the establishment's preventive maintenance program or in inspection reports.
[9 CFR 416.2 (b) and 416.17]

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Don Carlson	Dr. Don Carlson 09/06/2006

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Bertin Ltda, Lins, Sao Paulo	08/21-22/2006	SIF 0337	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Don Carlson		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Brazil Est. SIF 0337
Bertin Ltda,
Lins, Sao Paulo

Date: 08/21-22/2006

Slaughter, Processing and Thermo Processing

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

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Don Carlson	Dr Don Carlson 08/21-22/2006

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Friboi Ltda, Andradina, Sao Paulo	08/23/2006	SIF 0385	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Don Carlson		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Brazil Est. SIF 0385 Date: 08/23/2006 Slaughter, Processing and Thermo Processing
Friboi Ltda,
Andradina, Sao Paulo

15/51. The number of cans to be sampled for CCP-4 B was not described in the HACCP plan, in the records documenting the measurement of the critical limit or in the monitoring procedures.
[9 CFR 417.2 (c) (5) and 417.8]

22/51. Results for the measurement of critical limits for CCP-4B were not recorded at the time the actual results were measured. The same quality control technician measured critical limits for CCP-4 B at three different locations and recorded results at the same time for three consecutive days.
[9 CFR 417.5 (b) and 417.8]

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Don Carlson	Dr Don Carlson 08/23/2006

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Industria E Comercio de Carnes Minerva Ltda. Av. Antonio Manco Bernardes S/N Barretos, Sao Paulo	08/24/2006	SIF 0421	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Don Carlson		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Brazil Est. SIF 0421 Date: 08/24/2006 Slaughter, Processing and Thermo processing
Industria E Comercio de Carnes Minerva Ltda.
Av. Antonio Manco Bernardes S/N
Barretos, Sao Paulo

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

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Don Carlson	Dr. Don Carlson 08/24/2006

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Sadia S/A Varzea Grande Mato grosso	08/28/2006	SIF 2015	Brazil
	5. NAME OF AUDITOR(S) Dr. Don Carlson		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58. Notice of Intent to Delist	X
59.	

60. Observation of the Establishment

Brazil Est. SIF 2015 Date: 08/28/2006 Processing
Sadia S/A
Varzea Grande
Mato grosso

15/51. The stabilization process for cooked roast beef was not considered in the hazard analysis. *Clostridium perfringens* was considered as a hazard reasonable likely to occur in the chilling process, but the establishment did not consider chilling time. The establishment considered the temperature of the finished product (-18°C), but not in relationship to the time interval from the end of the cooking cycle (≥80°C) to the end of the chilling cycle (≤4.4°C).
[9 CFR 318.17 (a) (2), 417.2 (c) (1) and 417.8] [FSIS Appendix B]

19/51. The establishment did not present supporting documentation to demonstrate how their cooked roast beef process met stabilization performance standards. Their written processing schedule was not validated for efficacy by a processing authority. [9 CFR 318.17 (b) and (c), 318.23 (d) (2) and (3), 417.4 and 417.8]

22/51. Supporting documentation furnished for the chilling of cooked roast beef did not support decisions made for chilling process in the HACCP plan, in the SSOP, or in the prerequisite programs.
[9 CFR 417.5 (a) (1) (2) and 417.8]

19/22/51. Control point records documenting the chilling process for fully cooked roast beef, documented lack of process control for the chilling process. Records documented that stabilization performance standards were not met and the cooked roast beef HACCP plan was inadequate.
[9 CFR 318.17 (a) (2), 417.4, 417.5 (3), 417.6 (a) and 417.8] [FSIS Appendix B]

58. The Federal Animal Products Inspection Service issued a Notice of Intent to Delist (NOID) effective August 28, 2006, to establishment SIF 2015 for failure to consider stabilization performance standards in the hazard analysis. The establishment demonstrated lack of process control by producing product destined for export to the United States with an inadequate HACCP plan.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Don Carlson	Dr. Don Carlson 08/28/2006

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Bertin Ltda Rdovia Navirai/Itaquirai, Zona Rural, km 02 Navirai, Moto Grosso do Sul	09/05/2006	SIF 3181	Brazil
	5. NAME OF AUDITOR(S) Dr. Don Carlson		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Brazil Est. SIF 3181
Bertin Ltda
Rdovia Navirai/Itaquirai, Zona Rural, km 02
Navirai, Moto Grosso do Sul

Date: 09/05/2006

Slaughter/Processing

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

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Don Carlson	Dr Don Carlson 09/05/2006

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Jack Links Do Brazil Ltda. International Food Company Itopeva, Sao Paulo	09/01/2006	SIF 3673	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Don Carlson		[X] ON-SITE AUDIT [ ] 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	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
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	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	O
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

Brazil Est. SIF 3673 Date: 09/01/2006 Processing
Jack Links Do Brazil Ltda.
International Food Company
Itopeva, Sao Paulo

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

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Don Carlson	Dr Don Carlson 09/01/2006

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Bertin Ltda. Rod Go 164 km 167 S/n Zona Rural Mozarlandia Goias	08/30/2006	SIF 4507	Brazil
	5. NAME OF AUDITOR(S) Dr. Don Carlson		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Brazil Est. 4507
Bertin Ltda.
Rod Go 164 km 167 S/n Zona Rural
Mozarlandia Goias

Date: 08/30/2006

Slaughter/Processing

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

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Don Carlson	Dr Don Carlson 08/30/2006

INFORMAL TRANSLATION OF OFFICIAL LETTER 101/2006/DIPOA
DECEMBER 11, 2006

DEAR DR. WHITE,

IN RESPONSE TO YOU NOVEMBER 15, 2006 LETTER FORWARDING THE DRAFT FINAL REPORT CONDUCTED IN BRAZIL DURING AUGUST 16 THROUGH SEPTEMBER 2006, I WOULD LIKE TO INFORM THE FOLLOWING:

1 – DR. CARLSON AT THE EXIT MEETING IN OUR OFFICE TRANSMITTED ALL AUDIT FINDINGS ADDRESSED IN THE DRAFT FINAL REPORT.

2 - DIPOA THROUGH CIRCULAR NUMBER 856/2006 RETRANSMITTED ALL THE INFORMATION PROVIDED BY DR. CARLSON TO DIPOA'S STATE REPRESENTATIVES DETERMINING THE IMMEDIATE CORRECTIONS OF ALL DEFICIENCIES IDENTIFIED BY DR. CARLSON. WE ALSO REQUESTED THAT ALL ESTABLISHMENTS LISTED AS ELIGIBLE TO EXPORT TO THE UNITED STATES; BASED ON THE FINDINGS OF THE REPORT, REVIEW THEIR PROGRAMS AND CONTROL PROCEDURES.

3 – FINALLY, WE WOULD LIKE TO KNOW FSIS POSITION REGARDING THE EQUIVALENCE OF NEW PROCEDURES RELATED TO *SALMONELLA* IN BEEF CARCASSES (AS PER OFFICIAL CIRCULAR 665/2006 – SEE COPIES ATTACHED BOTH IN ENGLISH AND PORTUGUESE).

SIGNED
DR. ARY CRESPIM DOS ANJOS
ACTING DIRECTOR OF DIPOA

REPÚBLICA FEDERATIVA DO BRASIL
MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO - MAPA
SECRETARIA NACIONAL DE DEFESA AGROPECUÁRIA - SDA
DEPARTAMENTO DE INSPEÇÃO DE PRODUTOS DE ORIGEM ANIMAL - DIPOA

Of. 104 /2006 /DIPOA **Brasília, 11 de dezembro de 2006**

Prezada Senhora White,

Em atenção ao expediente de 15 de novembro de 2006, encaminhando o relatório da auditoria realizada no Brasil, no período de 16 de agosto a 12 setembro de 2006, gostaríamos de informá-la o seguinte:

1 – Todas os achados da auditoria, constantes do relatório, foram transmitidos a este Departamento pelo auditor, Dr. Don Carlosn, na reunião final .

2 – O DIPOA, através da Circular nº 856/2006/CGPE/DIPOA, retransmitiu as informações constantes no relatório às representações deste Departamento nos estados para que as mesmas determinem a imediata correção das deficiências identificadas pelo Dr. Carlson. Também, solicitamos que todos os estabelecimentos constantes das listas de exportadores para os Estados Unidos, como base nos achados constantes no referido relatório, revisem seus programas e procedimentos de controle.

3 – Finalmente, gostaríamos de conhecer a posição do FSIS sobre a equivalência dos novos procedimentos relativos a pesquisa de Salmonella em carcaças de bovinos, previstos na Circular 665/2006/CGPE/DIPOA, de 19/09/2006 (cópia em anexo).

Atenciosamente

ARI CRESPIM DOS ANJOS
DIRETOR SUBSTITUTO DO DIPOA/SDA

Ilma Sra Sally White
Director
International Equivalence Staff
Office of International Affairs
WASHINGTON, DC