



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

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

NOV 29 2007

Dear Dr. Oliveira da Costa:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Brazil's meat inspection system August 14 to September 13, 2007. Comments received from the government of Brazil have been included as an attachment to the final report. Enclosed is a copy of the final audit report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (402) 344-5100, by facsimile at (402) 344-5169, or electronic mail at donald.smart@fsis.usda.gov

Sincerely,

Donald Smart
Director
International Audit Staff
Office of International Affairs

Enclosure

FINAL

NOV 28 2007

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

August 14 through September 13, 2007

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 (the Department of Inspection of Products of Animal Origin (DIPOA))
DIPOA	Department of Inspection of Products of Animal Origin
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
MAPA	Ministry of Agriculture, Livestock and Supply
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
<i>Salmonella</i>	<i>Salmonella</i> species
SDA	Agriculture and Livestock Defense Secretariat
SFA	Federal Superintendent for Agriculture, Livestock and Supply Office at State Level
SIF	Federal Inspection Service
SIPAG	Federal Service of Inspection of Products of Animal Origin at the State Level
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedures
UTRA	Regional Technical Units of Agriculture, Livestock, and Supply

1. INTRODUCTION

The audit took place in Brazil from August 14 through September 13, 2007.

An opening meeting was held on August 14, 2007, 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 (DIPOA) and/or representatives from the Service of Federal Inspection of Products of Animal Origin at the State Level (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; three SIPAG Offices located in three Federal Agriculture Offices at the State Level (Porto Alegre, Cuiaba and Belo Horizonte); one government microbiology laboratory located in Pedro Leopoldo; one private microbiology laboratory located in Sao Paulo; one government residue laboratory located in Porto Alegre; one meat processing establishment; and seven meat slaughter and processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	1	
	Regional (State)	3	SIPAG
	Local	8	Establishment level
Laboratories		3	
Meat Slaughter Establishments		7	
Meat Processing Establishments		1	
Cold Storage Facilities		0	

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 three SIPAG offices. The third part involved on-site visits to eight establishments: seven slaughter and processing establishments, and one processing establishment. The fourth part involved visits to one private and one government microbiology laboratory and one government

residue laboratory. The laboratories provide laboratory support for establishments certified to produce products destined for export to the U.S.

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, periodic supervisory 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, requirements for HACCP, SSOP, testing for generic *E. coli*, *Salmonella*, and government oversight/enforcement activities.

Equivalence determinations are those 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 third time it fails to meet a *Salmonella* performance standard.

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

The following deficiencies were identified during the FSIS audit of the Brazil's meat inspection system conducted in October 19 through November 7, 2005:

- One private microbiology laboratory was not complying with the FSIS *Salmonella* method.
 - Selective agar plates that were negative after 24 hours of incubation were not re-incubated and re-examined after an additional 24 hours.
 - Media lot identification was not included in the preparation records.
- One government microbiology laboratory was not yet prepared for microbiological testing of ready-to-eat samples from establishments certified to export to the U.S. The establishment was immediately suspended.
- One of eight establishments audited received a Notice of Intent to Delist (NOID) for serious deficiencies in SSOP and SPS requirements.
- Two of eight establishments audited did not meet HACCP on-going requirements regarding recordkeeping.
- Not all inspection officials were employed by the Ministry of Agriculture.

The following deficiencies were identified during the FSIS audit of the Brazil's meat inspection system conducted in August 16 through September 12, 2006:

- One of eight establishments audited received a NOID for failure to consider stabilization performance standards in the establishment's hazard analysis.
- One of eight establishments audited did not meet SSOP requirements.
- One of eight establishments audited did not meet SPS requirements.
- Two of eight establishments audited did not meet HACCP design and implementation requirements.
- Two of eight establishments audited did not meet HACCP recordkeeping requirements.
- Not all inspection officials were employed by the Ministry of Agriculture.

Deficiencies identified during the August 16 through September 12, 2006 audit were found to be corrected during the current audit.

MAIN FINDINGS

6.1 Government Oversight

There have been no significant changes in the organizational structure of Brazil's meat inspection system since the last audit.

DIPOA is structured under the Ministry of Agriculture, Livestock and Supply (MAPA). The Director of DIPOA reports to the office of the Agriculture and Livestock Defense Secretariat (SDA). DIPOA, Brazil's CCA, is responsible for providing government oversight of Brazil's meat inspection program. The International Export and Import Programs Coordination Division is one of the offices in DIPOA and the coordinator is responsible for: the development and management of export and import programs and policies including auditing procedures and certification of new establishments; the management of the regulation and rule making process; the development and management of field implementation strategies for FSIS food safety requirements; and the coordination of field inspection activities nationwide.

Each state in Brazil has a Superintendent for the Federal Agriculture Office (SFA) at the State Level. Federal Superintendents are political appointees of the Minister of Agriculture. On June 16, 2005 Ministry order Number 300 was issued creating the structure of SIPAG. SIPAG offices operate within the scope of the national organization of inspection operations coordinated by DIPOA. Each SIPAG office has a Chief that is in-charge of the inspection of agricultural products and is responsible for the coordination and implementation of inspection operations in the establishments located within the State.

In addition, there are regional offices operating within the states. These regional offices are officially referred to as: Regional Technical Units of Agriculture, Livestock, and Supplies (UTRA). UTRA offices were established to support the activities of SIPAG offices 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. UTRA offices perform mainly administrative functions; however, the Chief of UTRA offices routinely conduct periodic supervisory reviews of U.S.-certified establishments.

6.1.1 CCA Control Systems

The CCA maintains legal and supervisory control of SIPAG offices to ensure uniform implementation of inspection activities in all states containing U.S. certified establishments.

No deficiencies were observed in the organizational structure or the control systems of the CCA.

6.1.2 Ultimate Control and Supervision

DIPOA has developed written procedures and audit standards to implement an audit program for the oversight of the state inspection system. Auditors from the General Coordination of Special Programs (CGPE) conduct audits of 40 percent of all export establishments, including U.S. certified establishments, one time each six months. These audits, conducted by CGPE, include an audit of the manage controls of the Chief of SFA at the SIPAG offices and audits of U.S. certified establishments. Audits of the establishments include: the periodic supervisory reviews conducted at the establishment, the establishment's PR/HACCP programs and Federal Inspection Service (SIF) inspection control programs.

Elements of FSIS Directive 5000.1, rev 1 are used by SIF to conduct verification activities in establishments certified for U.S. export. Periodic supervisory reviews, including assessing and evaluating job performance of the veterinary inspector in-charge, are conducted by state supervisors that are not assigned as a veterinarian in-charge of the same U.S. certified establishment. State supervisors could have other responsibilities such as responsibilities within a SIPAG office, assigned as a Chief of an UTRA office, or as a veterinarian in-charge of an establishment located in the same state or another State. However, in all SIPAG offices, the veterinarian conducting periodic supervisory reviews is not required to perform reviews, including assessing and evaluating job performance, in the same establishment he or she is permanently assigned.

No deficiencies were observed in the ultimate control and supervision of U.S. certified establishment.

6.1.3 Assignment of Competent, Qualified Inspectors

DIPOA has scheduled PR/HACCP training specifically for the newly hired employees that will be replacing municipal employees and Ministry of Agriculture employees that have had not received training. Scheduled training will also concentrate on verification activities found in FSIS Directive 5000.1 Revision 1 (Circulars 175 and 176) and traceability for establishments certified to export to the European Union. On-going training needs of veterinarians and agents are identified and scheduled as part of the periodic supervisory review process.

No deficiencies were observed in the assignment of competent, qualified inspectors to U.S. certified establishments.

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 Regulations for the Inspection of Industrial Sanitation for Products of Animal Origin (RIISPOA). The CCA has the authority and responsibility to enforce the inspection laws, and it has developed 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 periodic supervisory reviews.

Although Brazil's CCA has the legal authority and responsibility to enforce FSIS requirements, not all FSIS requirements were enforced in the eight establishments audited. For example:

- In one establishment, SIF inspection officials were not conducting verification of monitoring activities for CCP 1-B, zero tolerance for milk, ingesta, and fecal material on beef carcasses.
- In three establishments, preshipment review records were initialed, but were not signed.
- In one establishment, corrective actions for measures to prevent recurrence of fecal contamination identified in the HACCP plan and in the records documenting actions taken in response to a deviation from a critical limit were not effective.
- In one establishment, stair steps, located at the end of a continuous cooker in the can filling room, did not have a protective shield to protect meat product entering a grinder located below the steps from contamination.

6.1.5 Adequate Administrative and Technical Support

The General Coordination of Agriculture Laboratories (CGAL) is the oversight body that coordinates laboratory activities. CGAL conducts internal audits of government and private laboratories two times per year. Normative Instructional number 40 transmits FSIS laboratory methodologies into Brazilian law and was published in the Brazilian Federal Register by the CCA December 16, 2005.

No deficiencies were observed in the administrative and technical support of Brazil's laboratory system.

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 the CCA officials' responses. Records reviewed were:

- Internal review reports.
- Training programs for inspection personnel.
- CGPE audit protocols.
- 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 audit protocol.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with disease conditions and of inedible and condemned materials.
- Control of imported livestock and meat.
- BSE surveillance and control programs.
- Guidelines for testing for *Salmonella* in raw product.

No concerns were identified as a result of the examination of these documents.

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 to produce products destined for export to the U.S. The auditor conducted reviews of three SIPAG offices located in Porto Alegre, Cuiaba and Belo Horizonte and the inspection offices at the eight establishments audited to assess the effectiveness of the delivery and implementation of inspection programs. The Chief for the Inspection of Animal Products and/or his designee, in each SIPAG office and the veterinarian in-charge of each establishment audited were interviewed and the following records were reviewed:

- Internal audit reports conducted by CGPE.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training programs and records for inspectors.
- 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 and control of noncompliant product, and withholding, suspending inspection services.
- 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.
- Performance evaluation procedures and records.
- Conflict of interest policies and records.

Concerns identified as a result of 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. Seven were slaughter and processing establishments and one was a processing establishment. No establishments were delisted or received a NOID by Brazil. No deficiencies that would affect food safety were observed in the eight establishments audited.

Specific deficiencies are noted on the attached individual establishment reports.

8. 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. The following laboratory was audited:

- One government residue testing laboratory, LANAGRO, located in Porto Alegre, Rio Grande do Sul was conducting test on product destined for export to the U.S. for Sulfas, Arsenic, Cadmium, Lead and Mercury.

No deficiencies were observed.

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 U. S. samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the PR/HACCP requirements. The following laboratories were audited:

- One government microbiology testing laboratory, LANAGRO, located in Pedro Leopoldo, Minas Gerais was conducting tests for *Listeria monocytogenes* and *Salmonella spp.* in ready-to-eat products destined for export to the U.S.
- One private microbiology laboratory, CERELAB, located in Sao Paulo, Sao Paulo was conducting carcass sponge sample analysis for generic *E. coli* and *Salmonella spp.* and environmental sample testing for *Listeria spp.*

No deficiencies were observed.

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 exception:

- The over-spray, from the washing of half carcasses, was spraying water onto carcass rails and over-product structures. Water was dripping from the rails and the over-product structures onto the half carcasses passing through the carcass wash.

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:

- Stair steps, located at the end of a continuous cooker in the can filling room, did not have a protective shield to protect meat product entering a grinder located below the steps from contamination.

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 observed.

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 establishments approved to export meat products to the United States are 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 audited had not adequately implemented their HACCP plans. Examples of these deficiencies include:

- One of eight establishments audited failed to maintain process control in their slaughter operations. For example:
 - Corrective actions for measures to prevent recurrence of fecal contamination identified in the HACCP plan and in the records documenting actions taken in response to a deviation from a critical limit were not effective. Monitoring records identified daily and multiple deviations from the critical limit for CCP 1-B, zero-tolerance for fecal, ingesta and milk on beef carcasses. The last reassessment of the establishment's HACCP plan, August 20, 2007, failed to adequately identify process control measures to eliminate repetitive deviations.
- Three of eight establishments audited failed to maintain HACCP records for on-going recordkeeping requirements:
 - Preshipment review records were initialed, but were not signed.

11.3 Testing for Generic *E. coli*

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

Seven 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 seven slaughter establishments audited.

11.4 Testing for *Listeria monocytogenes*

Three of eight establishments audited were producing ready-to-eat products for export to the United States. In accordance with the United States requirements, the HACCP plans in these establishments had been reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to occur.

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.

No deficiencies were observed.

Brazil's National Residue Control Program for 2007 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

Daily inspection was provided as required for all establishments audited.

13.2 Testing for *Salmonella* in Raw Product

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 third time it fails to meet a *Salmonella* performance standard in raw product.

Testing for *Salmonella* was properly conducted in all of the seven establishments.

No deficiencies were observed.

13.3 Species Verification

Species verification was being conducted in those establishments in which it was required.

No deficiencies were observed.

13.4 Periodic Reviews

During this audit, it was found that in all establishments visited, periodic supervisory reviews of certified establishments 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 list of federal inspection personnel have been published in the Diario Oficial da Uniao and soon all will be positioned to replace municipal SIF contract employees.

Records of payment for federal and municipal inspectors and receipts for payment by inspectors to the establishment for meals and transportation were reviewed.

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 countries for further processing

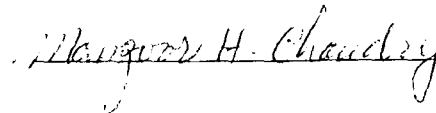
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on September 13, 2007, 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.

 Don Carlson, DVM
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 JBS, Grupo, Friboi. Avenida Marechal, Rondon, 500 Barra do Garças Mato Grosso 0	2. AUDIT DATE 08/24/07	3. ESTABLISHMENT NO. SIF 0042	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Don Carlson, 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	O
8. Records documenting implementation.		34. Species Testing	O
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	
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	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

80. Observation of the Establishment

Date: 08/24/07 Est #: SIF42 (JBS, Grupo, Friboi, [S/P/CS]) (Mato Grosso, Brazil)

Slaughter/Processing

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

61. NAME OF AUDITOR
Don Carlson, DVM

62. AUDITOR SIGNATURE AND DATE

Don Carlson, DVM 08/24/07

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION JBS, S/A Ave. Central, s/n-Bairro Frigorifico Barcelos, Sao Paulo CEP: 14784-900	2. AUDIT DATE 08/30/07	3. ESTABLISHMENT NO. SIF 0076	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Don Carlson, 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	O
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	
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.	X	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	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 08/30/07 Est #: SIF76 (Friboi Alimentos LTD []) (Sao Paulo, Brazil)

Slaughter/Processing

- 22/51 Preshipment review records were initialed, but were not signed. [9CFR 417.5 (c) and 417.8]

- 51 SIF inspection officials were not conducting verification of monitoring activities for CCP 1-B, zero tolerance for milk, ingesta, and fecal material on beef carcasses. Inspection records documented livestock carcass examination according to instructions of FSIS Directive 6420.2 for the measurement of the critical limit, but there were no SIF records documenting verification (direct observation) of the establishment's monitoring activities. All other monitoring activities, conducted by the establishment for CCPs, were verified and documented by SIF inspection officials. [9CFR 417.8]

61. NAME OF AUDITOR
Don Carlson, DVM

62. AUDITOR SIGNATURE AND DATE

Don Carlson, DVM 08/30/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Pampeano Alimentos S.A. Estacao Santo Antonio Km 32 Hulha Negra, 96460	2. AUDIT DATE 08/20/07	3. ESTABLISHMENT NO. SIF 0226	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Don Carlson, 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.	X	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/Bonetess (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
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

Date: 08/20/07 Est #: SIF226 (Pampeano Alimentos S.A. [P]) (Hulha Negra, Brazil)

Processing

- 22/51 Preshipment review records were initialed, but were not signed. [9CFR 417.5 (c) and 417.8]
- 46/51 Stair steps, located at the end of a continuous cooker in the can filling room, did not have a shield to protect meat product entering a grinder located below the steps from contamination. There was a protective shield over the meat grinder, but the shield was constructed with a three inch gap to accommodate a product chute. This gap allowed the potential entry of contamination from the stair steps located above the product to enter the grinder located below the stair steps. [9CFR 416.4 (d)]

61. NAME OF AUDITOR
Don Carlson, DVM

62. AUDITOR SIGNATURE AND DATE

Don Carlson, DVM 08/20/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION IFC-International Food Company Industria de Alimentos Fernandopolis, Sao Paulo, Sao Paulo	2. AUDIT DATE 08/31/07	3. ESTABLISHMENT NO. SIF 0333	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Don Carlson, 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	O
8. Records documenting implementation.		34. Species Testing	O
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	
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	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment Date: 08/31/07 Est. #: SIF333 (IFC-International Food Company Industria de Alimentos []) (Fernandopolis, Brazil)

Slaughter/Processing

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

61. NAME OF AUDITOR
Don Carlson, DVM

62. AUDITOR SIGNATURE AND DATE

Don Carlson, DVM 08/31/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION JBS, S/A Ave Domingos Ferreira de Medeiros s/n Parque Industrial Presidente Epitacio Sao Paulo, Sao Paulo	2. AUDIT DATE 08/28/07	3. ESTABLISHMENT NO. SIF 0458	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Don Carlson, 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	
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.	X	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	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQU/Park Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 08/28/07 Est #: SIF458 (Friboi Ltda (J)) (Sao Paulo, Brazil)

Slaughter/Processing

22/51 Preshipment review records were initialed, but were not signed. [9CFR 417.5 (c) and 417.8]

61. NAME OF AUDITOR

Don Carlson, DVM

62. AUDITOR SIGNATURE AND DATE

Don Carlson, DVM 08/28/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frisa Frigorifico Rio Doce S.A. Fioavante Rossi, 4000 Bairro Honorio Fraga Nanuque 255-Colatina-ES	2. AUDIT DATE 09/05-06/07	3. ESTABLISHMENT NO. SIF 2051	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Don Carlson, 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	O
8. Records documenting implementation.		34. Species Testing	O
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	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.	X	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	
25. General Labeling		53. Animal Identification	
26. Fin. Prod Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 09/06/07 Est #: SIF2051 (Frisa Frigorifico JJ) (Nanuque, Minas Gerais, Brazil)

Slaughter/Processing

20/51 Corrective actions for measures to prevent recurrence of fecal contamination identified in the HACCP plan and in the records documenting actions taken in response to a deviation from a critical limit were not effective. Monitoring records identified daily and multiple deviations from the critical limit for CCP 1-B, zero-tolerance for fecal, ingesta and milk on beef carcasses. The last reassessment of the establishment's HACCP plan, August 20, 2007, failed to adequately identify process control measures to eliminate repetitive deviations. The review of SIF inspection and establishment records indicated that no adulterated product had been shipped from this establishment. [9CFR 417.3 (a) (3) and 417.8]

61. NAME OF AUDITOR
Don Carlson, DVM

62. AUDITOR SIGNATURE AND DATE

Don Carlson, DVM 09/05-05/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION JBS, S/A. Araputanga, Sao Paulo, Sao Paulo	2. AUDIT DATE 08/23/07	3. ESTABLISHMENT NO. SIF 2979	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Don Carlson, 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	O
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 SSOPs 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	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 08/23/07 Est #. SIF2979 (JBS, Grupo, Friboi. [S/P]) (Araputanga, Brazil)

Slaughter/Processing

- 10 An establishment employee, washing beef half carcasses at the final carcass wash, was spraying water onto carcass rails and over-product structures. Water was dripping from the rails and the over-product structures onto the half carcasses passing through the carcass wash. The protective shield, located over the half carcasses, was not designed to protect the rails and over-product structures from the water overspray. Appropriate corrective actions were initiated by the establishment after intervention by the SIF veterinarian in-charge of the establishment. The effected carcasses were retained by the SIF veterinarian in-charge for the establishment to evaluate and recondition. [9CFR 416.13 (c)]

61. NAME OF AUDITOR
Don Carlson, DVM

62. AUDITOR SIGNATURE AND DATE

Don Carlson, DVM 08/23/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Marfrig Industria e Comercio de alimentos Ltda Via de Acesso Dr. Shuhei Uetsuka Km 02 Promissao, Sao Paulo CEP 16370-000	2. AUDIT DATE 08/29/07	3. ESTABLISHMENT NO. SIF 3712	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Don Carlson, 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	O
8. Records documenting implementation.		34. Species Testing	O
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	
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	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQU/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 08/29/07 Est #: SIF3712 (Marfrig Industria e Comercio de alimentos Ltda {} (Promissao, Brazil)

Slaughter/Processing

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

61. NAME OF AUDITOR

Don Carlson, DVM

62. AUDITOR SIGNATURE AND DATE

Don Carlson, DVM 08/29/2007

Smart, Donald

From: Silva, Joao [Joao.Silva@fas.usda.gov]
Sent: Monday, November 26, 2007 8:52 AM
To: Smart, Donald
Cc: Autry, Elizabeth
Subject: Brazil: FSIS Draft Final Audit Report (Response from DIPOA)
Attachments: DiposResponseRepNov07.doc

Dear Dr. Smart,

Please find attached an electronic copy of DIPOA's response to the FSIS Draft Final Audit Report for Brazil. An informal translation of the attached response says:

In response to your letter dated October 2007, regarding the audit of the Brazilian system during August 14 through September 13, 2007 I have the following to inform you:

- 1) DIPOA confirms all the finding as per Dr. Don Carson's report
- 2) DIPOA through Circular number 871/CGPE/DIPOA retransmitted the findings in the report to the officials at the states involved (SIPAGs) and to the Federal Inspection Services (SIFs) in order to correct the non-conformities reported by Dr. Don Carson. DIPOA also requested from the establishments approved to the United States that based on the finding of the referred report revise their programs and procedures of controls.

Joao Faustino Silva
U.S. Embassy - Brasilia
Tel.: (55-61) 3312-7119
Fax: (55-61) 3312-7659
E-mail: joao.silva@usda.gov

11/27/2007



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

Ofício Nº 117/2007/DIPOA

Brasília, 12 de novembro de 2007

Prezado Sr. Smart,

Em atenção ao ofício da USDA/FSIS, datado de 29 de outubro de 2007, encaminhando o relatório de auditoria realizada no Brasil, no período de 14 de agosto a 13 de setembro de 2007, gostaríamos de informá-lo que:

1. Confirmamos todos os achados da auditoria constantes no relatório do Dr. Don Carlson.
2. O DIPOA, através da Circular nº 871/2007/CGPE/DIPOA, retransmitiu as informações presentes no relatório às autoridades competentes nos estados (SIPACs) e aos Serviços de Inspeção Federal (SIFs), para que os mesmos determinem a imediata correção das não conformidades detectadas pelo Dr. Don Carlson. Também, solicitamos que todos os estabelecimentos constantes da lista de exportadores para os Estados Unidos, com base nos achados constantes no referido relatório, revisassem seus programas e procedimentos de controle.

Atenciosamente

Ilmoº Sr. Donald Smart
Director, Import-Export Programs Staff
Office of International Affairs
FSIS/USDA
WASHINGTON, DC