



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

Dr. Hector J. Lazaneo
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Ministerio de Ganaderia, Agricultura y Pesca
Dirección General de Servicios Ganaderos
Division Industria Animal
Constituyente 1476
11200 Montevideo
Uruguay

AUG 22 2007

Dear Dr. Lazaneo:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of the Uruguay meat inspection system March 7 to March 29, 2007. Comments from Uruguay have been included as an attachment to the final report. Enclosed is a copy of the final audit report.

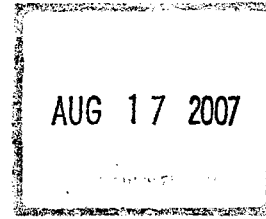
If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (402) 344-5100, by facsimile at (402) 344-5169, or electronic mail at donald.smart@fsis.usda.gov.

Sincerely,

Donald Smart
Director
International Audit Staff
Office of International Affairs

Enclosure

FINAL



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

MARCH 7 THROUGH MARCH 29, 2007

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

BSE	Bovine Spongiform Encephalopathy
CCA	Central Competent Authority [Ministry of Livestock, Agriculture and Fisheries]
CCP	Critical Control Point
DGSG	General Direction of Livestock Series
DIA	Meat Inspection Division
DICOSE	Division for the Control of Animal Herds
DILAVE	Division of Veterinary Laboratories
DSA	Animal Health Division
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
GOU	Government of Uruguay
<i>LM</i>	<i>Listeria monocytogenes</i>
MGAP	Ministry of Livestock, Agriculture and Fisheries
MLG	Microbiology Laboratory Guide
NOID	Notice of Intent to Delist
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
<i>Salmonella</i>	<i>Salmonella</i> species
SPS	Sanitation Performance Standards
SRM	Specified Risk Materials
SSOP	Sanitation Standard Operating Procedures

1. INTRODUCTION

The audit took place in Uruguay from March 7 through March 29, 2007.

An opening meeting was held on March 7, 2007, in Montevideo with the Central Competent Authority (CCA). At this meeting, the auditors confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Uruguay's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the Ministry of Livestock, Agriculture and Fisheries.

2. OBJECTIVE OF THE AUDIT

This audit was a routine audit with three objectives. The first objective 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. The second objective was to assess the status of corrective actions taken as a result of deficiencies identified in the FSIS November/December 2005 audit of Uruguay's meat inspection system. The third objective was to verify the implementation of FSIS regulatory requirements regarding non-ambulatory disabled cattle and Specified Risk Materials (SRM) in cattle.

In pursuit of the objectives, the following sites were visited: the headquarters of the CCA, eight government offices at the establishment level, one laboratory performing analytical testing on United States-destined product, six slaughter and processing establishments, and two meat processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	1	
		8	Establishment level
Laboratories		1	
Meat Slaughter and processing Establishments		6	
Meat Processing Establishments		2	
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 in the Uruguay's inspection headquarters and eight government offices at the establishment level. 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 government laboratory. The Division Laboratorios Veterinarios (DILAVE), a

residue and microbiology laboratory, was conducting analyses of field samples for Uruguay's national residue and microbiological control program.

Program effectiveness determinations of Uruguay'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, (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) programs and a testing program for generic *Escherichia coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. Uruguay's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, 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 Uruguay 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 that Uruguay's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Uruguay. FSIS requirements include, among other things, daily inspection in all certified establishments, monthly supervisory visits to 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* and *Salmonella*.

Currently, the two equivalence determinations requested by Uruguay are:

- i) The use of a different agar in the analysis of *Salmonella* samples. FSIS has determined that Uruguay's use of sulphamendelate for sulphapyridine is equivalent to FSIS' requirements.
- ii) FSIS has determined that Uruguay's generic *E. coli* testing program for sheep and goat is equivalent.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States 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 PR/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 reported during the FSIS audit of Uruguay's meat inspection system conducted in February/ March 2005:

- In one establishment, during a heavy rain, water was observed dripping from the ceiling onto a beef carcass.
- In one establishment, during a heavy rain, water was observed dripping from the ceiling in the room where cooked product was transferred to the plate freezers and also from the hallway ceiling of the carcass transfer area.
- In one establishment, two receiving doors used to receive fresh meat had openings on both sides of the platforms. Both doors were not maintained to prevent the entrance of vermin.
- In one establishment, a metal hopper used for the transfer of raw meat to the cooking room had rough welding and a crack in the edge of the hopper.
- In one establishment, a metal hopper used to receive raw meat for grinding has a crack in the hopper.
- In one establishment, the equipment and utensils were not stored in an orderly manner to facilitate proper inspection in the fork lift room adjacent to the cooler room hallway.
- In one establishment, water dripping from the ceiling was observed in the boxed meat transfer hallway.
- In one establishment, monitoring records which document a deviation from their critical limit for "zero tolerance" did not indicate whether the contaminant was feces, ingesta, or milk. Since the contaminant was not identified, the establishment cannot demonstrate that proper corrective actions were taken, and that measures to prevent recurrence were established.
- In one establishment, plant personnel did not follow aseptic technique during carcass sponge sampling for generic *E. coli*.

During November/December 2005, it was observed that all of the above deficiencies reported in the February/March 2005 audit had been corrected.

The following deficiencies were reported during the FSIS audit of Uruguay's meat inspection system conducted in November/December 2005:

- In one establishment, beef briskets and forelegs were coming in contact with the outer surface of an employee's metal platform, during the carcass fat trimming operation, causing cross-contamination.
- In three establishments, exposed hock joints were coming in contact with the outer surface of the employees' metal work platform during the carcass skinning operation, causing cross-contamination.
- In one establishment, in the evisceration room, most of the hanging metal hooks used at the carcass moving rail were coming in contact with the carcasses, causing cross-contamination.

- In one establishment, the receiving/ shipping door had an open space, which could allow the entry of vermin into the establishment.
- In two establishments receiving /shipping doors and other doors had open spaces, which could allow the entry of vermin into the establishment.
- In one establishment, flies were observed in the evisceration department.
- In one establishment a hand wash facility in the evisceration room was installed next to a wall, making thorough inspection impossible; two hand wash facilities in the hallway for carcass coolers had accumulations of debris and rust, and their soap dispensers were empty.
- In one establishment, the employees' entrance door into the establishment had an open space which could allow the entry of vermin into the establishment.
- In one establishment, dead flies were observed in the carton storage room, in the offal room, and in the adjacent room to the evisceration department.
- In one establishment, in the offal room, several metal trays used to carry offal had cracked corners.
- In one establishment, flumes used to transport offal had no openings to enable thorough inspection.
- In one establishment, metal and wood pieces were stored on the ground next to the maintenance room, which precluded thorough inspection by government program employees.
- In one establishment, in the canned product cooking room, the receiving area for raw product from an adjacent room had holes in the ceiling and in the wall.
- In one establishment, meat scraps had accumulated between a metal frame and the floor.
- In one establishment, product residues from previous days' operations had accumulated in a floor drain.
- In one establishment the cement floor in the offal freezer room was deteriorated and broken.
- In one establishment, the beef cubing machine had a rusty metal frame; another metal frame on this machine also made thorough inspection of this equipment impossible.
- In one establishment, there were holes in the metal frame of a rework table for dented cans.
- In one establishment, the insulation on fans installed for ventilation, in the storage room of raw product for canning, was partially missing and deteriorated, and water splash was coming out of two fans, falling onto covered product in barrels.
- In one establishment, there were multiple holes in the floor in the shipping area.
- In one establishment, there was rusty metal frame on the overhead structure in the vacuum package room.
- In one establishment, there was a residue build up on the outer surface of of the metal frame of a hand wash facility in the vacuum package room.
- In one establishment, during the head wash operation, much water was splashing out of the head washing cabinet causing a high potential for contamination of carcasses hung on the nearby moving carcass rail.
- In one establishment, the record produced for corrective actions and preventive measures, in the event of a deviation from the critical limit for CCP 1 (zero

tolerance for ingesta, fecal material and milk), did not differentiate between ingesta and fecal material.

- In one establishment, the HACCP pre-shipment document review records were initialed instead of signed by the person who completed them.
- In one establishment, a plant employee in the evisceration room was observed to hold the spinal cord of each carcass with his gloved left hand while removing it, and proceeded to contact the carcass with the same hand, thereby creating the potential for cross contamination.

The DILAVE “Miguel C. Rubino,” is a government microbiology laboratory located in Montevideo, and was conducting analyses of field samples for the presence of *Salmonella* species and *Listeria monocytogenes*.

The following deficiency was noted.

- A wooden cabinet/table was used to analyze microbiological samples.

The DILAVE “Miguel C. Rubino” is a government residues laboratory located in Montevideo, and was conducting analyses of field samples for the residues.

The following deficiencies were noted.

- Rust particles were found on the equipment in the atomic absorption analysis room and unused equipment was stored in the same room.
- A rusty table, cobwebs and stored trash were observed in the utensil washing room.
- Dust particles were found on the solvent evaporation equipment.
- Deteriorated insulation without a cover was observed on an air conditioning unit in the anabolic preparation room.
- In the laboratory, open windows for air circulation were observed and some of the light bulbs were not functioning.
- There was an accumulation of metal debris observed on the metal exhaust system in the pesticide laboratory.

During this current audit of March 2007, it was observed that all of the above deficiencies reported in the November/December 2005 audit had been corrected.

6. MAIN FINDINGS

6.1 Government Oversight

Uruguay’s inspection system is directed from the central headquarters at Montevideo. At the central office (headquarters) there are 20 veterinarians, including the Meat Inspection Division (DIA) Director, Heads of Departments, Area Supervisors and four administrative employees.

The structure of the DIA is organized under the general direction of Livestock Services.

Under DIA, there are five Departments. These are the Technical Department, the Slaughter Establishments Department, the Processing Establishments Department, the International Trade Department, and the Grading Department.

6.1.1 CCA Control Systems

Uruguay's Central Competent Authority (CCA), is the Ministry of Livestock, Agriculture and Fisheries (MGAP). Uruguay's inspection system is directed from the central headquarters at Montevideo, and there are no local, district or regional levels. This is the level of government that FSIS holds responsible for ensuring that FSIS regulatory requirements are implemented and enforced. The MGAP, with regard to meat inspection, is staffed with approximately 415 personnel. At the central office (headquarters) there are 20 veterinarians, including the Meat Inspection Division (DIA) Director, Heads of Departments, Area Supervisors and four administrative employees. At the establishments, there are 105 veterinarians and 312 food inspectors (assistants).

The structure of the DIA is organized under the general direction of Livestock Services, together with the Animal Health Division (DSA), the Division of Veterinary Laboratories (DILAVE) and the Division for the Control of Live Stock (DICOSE). The General Director of the Livestock Services reports directly to the Minister of MGAP.

Under DIA, there are five Departments. These are the Technical Department, the Slaughter Establishments Department, the Processing Establishments Department, the International Trade Department, and the Grading Department. Each department has official staff in the certified establishments who are in charge of direct control of the activities. All field personnel are supervised from the DIA office in Montevideo.

6.1.2 Ultimate Control and Supervision

The process for initial establishment certification is as follows. When any establishment wishes to be certified by DIA as eligible to export to the United States, the first step is to approach the DIA for instructions on how to achieve compliance with the requirements. There is a resolution issued by DIA specifying the procedure to approve establishments that wish to export their products to "high requirements markets", e.g. Canada, China, the EU and Israel. The procedure involves the creation of a special team of higher-level personnel from the different departments who are responsible for assessing the establishment's capability for achieving compliance. This team conducts an in-depth on-site audit of all aspects of the facilities, operations, and controls and submits a report to the Director of DIA. The report is reviewed by the Director and, if the establishment is determined to be in compliance with the FSIS requirements, the establishment is granted certification for eligibility for access to the U.S. market, and FSIS is notified of the new certification.

Inspection documents are normally distributed to field personnel via a "folder system." This system has been developed to ensure that the information effectively reaches its destination and all records are properly maintained. Each establishment has a special private folder kept at the headquarters office in Montevideo. Documents are put into each folder, such as the residue national sampling plan, any resolutions or instructions, and similar documents. Each week, personnel from the establishments pick up the

contents from the folder and sign a form indicating that they have received the information.

Supervisory reviews of each certified establishments were being performed at least once a month and audit reports were covering U. S. regulatory requirements in detail. One copy of these documents is kept at the establishment and another copy is at the central headquarters. The FSIS auditor verified that the most recent report generated from these reviews included a documented review of the SSOP, HACCP systems, and Bovine Spongiform Encephalopathy (BSE)/SRM controls in each establishment.

Government employees cannot perform establishment-paid tasks at any establishment. Government veterinarians can have private practice or any teaching activities at the school or university level. Any private veterinary practitioners or establishment paid individuals are not hired as part-time government employees. All salaries of meat inspection personnel are paid by the national government, including a special compensation for "full-time availability."

The responsibilities and performance standards of employees at each grade are described in an official document issued in 1988 by the Civil Service General Office (Reorganizacion Administrativa del MGAP Tomo II).

All government employees are rated annually by the immediate supervisor. These performance ratings are sent to a special Commission made up by the higher-level personnel, elected both by DGSG and by the employees. This Commission evaluates performance ratings and concerns raised by employees.

6.1.3 Assignment of Competent, Qualified Inspectors

Full-time, permanent CCA veterinarians must have a University degree in Veterinary Science or Veterinary Medicine to be considered qualified to apply for the inspection service. Assistant inspectors must be advanced students of Veterinary Medicine with third curricula year courses completed or Agriculture Technicians (Polytechnic School diploma) since December 2, 1997. The U.S. HACCP Consulting Group offered two training courses concerning SSOP, PR/HACCP systems and *E. coli* testing for all veterinarians working in meat inspection and meat industry officials in 2004. The DIA veterinarians also received training in quality assurance standards ISO 9000; quality manuals (handbooks) standard ISO 10013, audit standard ISO 10011 and laboratory accreditation ISO 17025 by the Uruguayan Institute for Technical Standards (Instituto Uruguayo de Normas Tecnicas-Unit).

The following trainings were given to all the in plant veterinarians in year 2006:

- HACCP Advance training given by International HACCP alliance.
- European Regulations training given by Dr. Gonzalez Solana from Spain.
- Auditor HACCP training given by International HACCP Alliance.
- Certification of the product training given by Dra. Villar from Uruguay Institute of Standards (UNIT).

All veterinarians and food inspectors (assistants) employed by the MGAP are full-time employees.

6.1.4 Authority and Responsibility to Enforce the Laws

MGAP has the authority and responsibility to enforce the applicable laws relevant to U.S. certified establishments. MGAP has the authority to approve establishments for export to the United States, but also has the responsibility for withdrawing such approval when establishments do not have adequate and/or effective controls in place to prevent, detect, and eliminate product contamination/adulteration. The Area Supervisors are in-charge of verifying and evaluating the implementation of the official guidelines and instructions.

6.1.5 Adequate Administrative and Technical Support

During the audit, the auditor found that the CCA has the administrative and technical support to operate Uruguay's inspection system and has the resources and ability to support a third-party audit.

6.2 Headquarters Audit

The auditor conducted a review of inspection system documents at the headquarters of the inspection service and in one government office at the establishment level. The records review focused primarily on food safety hazards and included the following:

- Supervisory visits to establishments that were certified to export to the United States
- Training records for inspectors and laboratory personnel.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock such as inedible, condemned materials, and SRMs.
- Export product inspection and control including export certificates.
- Enforcement records.

No concerns arose as a result the examination of these documents.

7. ESTABLISHMENT AUDITS

The FSIS auditors visited a total of eight establishments: Six slaughter and processing establishments, and two processing establishments. No establishments were delisted by Uruguay's inspection officials. No establishments received a Notice of Intent to Delist (NOID).

Specific deficiencies noted during this FSIS audit are attached in the individual establishment review forms.

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. Residue laboratory was not audited this time.

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 evaluates compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements.

The following laboratory was audited:

The DILAVE “Miguel C. Rubino,” is a government microbiology and residue laboratory located in Montevideo, and was conducting analyses of field samples for the presence of *Salmonella* species and *Listeria monocytogenes*.

The following deficiencies were reported.

- The sample size being used for testing of RTE product for *Salmonella* was only 25 grams (per method MLG 4.02), instead of 325 grams as required for method MLG 4.03.
- The scale used to weigh samples of RTE product had not been calibrated since 2004. No calibration log was kept for this scale at the time of this audit.
- The sample size being used for testing of RTE product for *Salmonella* was only 25 grams (per method MLG 4.02), instead of 325 grams as required for method MLG 4.03.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditors focus on five areas of risk to assess Uruguay’s meat inspection system. The first of these risk areas that the FSIS auditors reviewed was Sanitation Controls.

Based on the on-site audits of establishments, and except as noted below, Uruguay’s inspection system had controls in place for SSOP programs, facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling, storage practices, and SRMs handling procedures in their prerequisite programs.

Specific deficiencies are noted on the attached establishment review forms.

In addition, Uruguay's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, workspace, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

9.1 Sanitation Standard Operating Procedures

Each establishment was 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 all of the eight establishments were found to meet the basic FSIS regulatory requirements.

In two of the eight establishments, the ongoing SSOP requirements were not met.

Specific deficiencies are noted on the attached establishment review forms.

9.2 Sanitation Performance Standards

In three of eight establishments, the specific provisions of the United States regulations were not implemented.

The specific deficiencies are noted in the attached individual establishment review forms.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditors reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, humane handling and humane slaughter, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditors determined that Uruguay's inspection system had adequate controls in place.

No deficiencies were reported.

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 auditors reviewed was Slaughter/Processing Controls. The controls include the following areas: 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 the required establishments and implementation of a generic *E. coli* testing program in slaughter establishments.

The specific deficiencies are noted in the attached individual establishment review forms.

11.1 Humane Handling and Slaughter

No deficiencies were reported in regard to humane handling and humane slaughter.

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 United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of all eight establishments. All eight establishments reviewed had implemented the HACCP requirements.

No deficiencies were reported in regard to HACCP implementation.

11.3 Testing for Generic *E. coli*

Uruguay has adopted the FSIS regulatory requirements for generic *E. coli* testing with the exception of the following equivalent measures:

- Generic *E. coli* testing program for sheep and goat had been determined to be equivalent.

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 United States' domestic inspection program.

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

11.4 Testing for *Listeria monocytogenes*

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

No deficiencies were reported.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditors 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.

Uruguay's National Residue Testing Plan for 2007 was being followed and was on schedule.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditors reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella*.

13.1 Daily Inspection in Establishments

Daily inspection was being conducted in all slaughter and processing establishments.

13.2 Testing for *Salmonella*

Uruguay has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measure:

- A different agar medium is used in the analysis of *Salmonella* (substitution of sulphamendelate for sulphapyridine).

Six of the eight establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

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

13.3 Species Verification

Species verification was being conducted in all the establishments audited as required.

13.4 Periodic Reviews

During this audit, it was found that in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required.

13.5 Inspection System Controls

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

The CCA has all enforcement controls in place that are required by FSIS regulations.

14. CLOSING MEETING

A closing meeting was held on March 29, 2007, in Montevideo with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.



Farooq Ahmad, 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 Establecimientos Colonia S.A. Ruta 22 Tarariras Colonia	2. AUDIT DATE 03/20/07	3. ESTABLISHMENT NO. 2	4. NAME OF COUNTRY Uruguay
5. NAME OF AUDITOR(S) Farooq Ahmad, 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	O
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.		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. SRM	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 03/20/07 Est #: 2 (Establecimientos Colonia S.A. [S/P]) (Colonia, Uruguay)


46/58/51 A plant employee in the evisceration room, was observed to hold the spinal cord of each carcass with his gloved left hand while removing it, and proceeded to contact the carcass with the same hand, thereby creating the potential for cross contamination.

The government official told the production supervisor to take immediate corrective actions.

[Regulatory reference: 9 CFR 310.22(d)(3) and 416.4(a)]

61. NAME OF AUDITOR
Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

 4/3/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorifico Pul, Pulsa S.A. Ruta 8, Km. 389 Cerro Largo	2. AUDIT DATE 3/13/2007	3. ESTABLISHMENT NO. 7	4. NAME OF COUNTRY Uruguay
5. NAME OF AUDITOR(S) Farooq Ahmad, 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.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	O
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	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. SRM	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

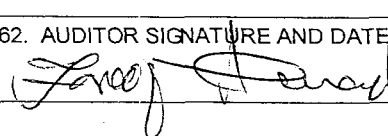
Date: March 13, 2007 Est #: 7 (Frigorifico Pul, Pulsa S.A. [S/P]) (Cerro Largo, Uruguay)

10/51 In the boning room, a buildup of blood residues was observed on the meat packing table and under the metal frame used to hold plastic bags that was attached to a meat packing table.
The government official told the production supervisor to take immediate corrective actions.
[Regulatory reference: 9 CFR 416.13 and 416.17]

61. NAME OF AUDITOR

Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

 4/3/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorifico Tacuarembó S.A. Rutas 5 y 26 Tacuarembó	2. AUDIT DATE 3/14/2007	3. ESTABLISHMENT NO. 12	4. NAME OF COUNTRY Uruguay
5. NAME OF AUDITOR(S) Faroq Ahmad, 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	O
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. BSE	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			


60. Observation of the Establishment

Date: 3/14/2007 Est #: 12 (Frigorifico Tacuarembó S.A. [S/P]) (Tacuarembó, Uruguay)

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

61. NAME OF AUDITOR
Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

 4/3/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Carlos Schneck S.A. Camino Colman 4598 Montevideo	2. AUDIT DATE 3/16/2007	3. ESTABLISHMENT NO. 52	4. NAME OF COUNTRY Uruguay
5. NAME OF AUDITOR(S) Farooq Ahmad, 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	O
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	X
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	X
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.		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. SRM	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

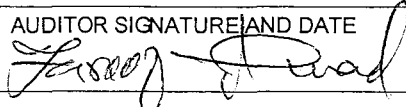
Date: 3/16/2007 Est #: 52 (Carlos Schneck S.A. [S/P]) (Montevideo, Uruguay)

- 39/51 Pieces of rusty metal were observed on the wall in the corridor to the room for retained carcasses. The government official had written this finding in the supervisory report for corrective actions by the plant. [Regulatory reference: 9 CFR 416.2(b)]
- 45/51 Uneven welding was observed on the boning tables and the hand wash facility in the boning room and buildups of rust and product residues were observed on thawing equipment for frozen meat. The government official had written this finding in the supervisory report for corrective actions by the plant. [9 CFR 416.3(a) and (b) and 416.17]
- 46 Pieces of fat from the previous day's production were observed on the floor, and an unpleasant odor was noted in the plate freezer room (which was not in use at the time of this audit). The government official had rejected this room for proper cleaning. [9 CFR 416.4(b)]

61. NAME OF AUDITOR

Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

 4/3/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Inaler S.A. Paraje Banado San Jose	2. AUDIT DATE 3-19-07	3. ESTABLISHMENT NO. 55	4. NAME OF COUNTRY Uruguay
5. NAME OF AUDITOR(S) Farooq Ahmad, 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	O
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. SRM	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 3-19-07 Est #: 55 (Inaler S.A. [S/P]) (San Jose, Uruguay)

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

61. NAME OF AUDITOR
Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

Farooq Ahmad 4/3/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorifico Las Moras (Chiadel S.A.) Camino Aldabalde s/n La Faz Canelones	2. AUDIT DATE 3/22/07	3. ESTABLISHMENT NO. 104	4. NAME OF COUNTRY Uruguay
	5. NAME OF AUDITOR(S) Farooq Ahmad, 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.	X		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.			37. Import	O
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X		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	X
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. SRM	
30. Corrective Actions			59.	
31. Reassessment				
32. Written Assurance				

60. Observation of the Establishment

Date: 3/22/07 Est. #: 104 (Frigorific Las Moras (Chiadel S.A.) [S/P]) (Canelones, Uruguay)

- 10/12 Extraneous material (small stones and debris) was observed in the neck area on approximately 13 beef forequarters in two coolers.
The government official tagged both cooler rooms and told the plant supervisor to take immediate corrective actions.
[Regulatory references: 9 CFR 416.13 and 416.15]
- 41 Heavy dripping condensate was observed on the ceiling in a large cooler where boxed meat was stored on racks. (No product was stored in the affected area at the time of this audit.)
The government official had written this finding in the supervisory report for corrective actions by the plant.
[9 CFR 416.2(d)]

61. NAME OF AUDITOR
Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

Farooq Ahmad 4/3/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Erel S.A. Ruta 9, Km. 148 San Carlos Maldonado	2. AUDIT DATE 3/9/2007	3. ESTABLISHMENT NO. 135	4. NAME OF COUNTRY Uruguay
5. NAME OF AUDITOR(S) Farooq Ahmad, 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	O
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. BSE	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

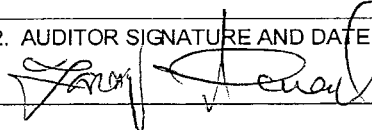
60. Observation of the Establishment

Date: 3/9/2007 Est #: 135 (Erel S.A. [P]) (Maldonado, Uruguay)

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

61. NAME OF AUDITOR
Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

 4/3/2007

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Dinolar S.A. Ruta 8, Km. 28.200 Pando Canelones	2. AUDIT DATE March 26, 07	3. ESTABLISHMENT NO. 158	4. NAME OF COUNTRY Uruguay
5. NAME OF AUDITOR(S) Farooq Ahmad, 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	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	O
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. SRM	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

Date: March 26, 2007 Est #: 158 (Dinolar S.A. [P]) (Canelones, Uruguay)

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

61. NAME OF AUDITOR
Farooq Ahmad, DVM

62. AUDITOR SIGNATURE AND DATE

Farooq Ahmad 4/3/2007



MINISTERIO DE GANADERIA, AGRICULTURA Y PESCA
DIRECCION GENERAL DE SERVICIOS GANADEROS
DIVISION INDUSTRIA ANIMAL

CONSTITUYENTE 1476
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TEL: 5982 412 6346
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Montevideo, 30th April 2007

MR. DONALD SMART
DIRECTOR
INTERNATIONAL AUDIT STAFF
OFFICE OF INTERNATIONAL AFFAIRS
FOOD SAFETY AND INSPECTION SERVICE, USDA

Dear Mr. Smart,

In order to deliver a response to the preliminary audit findings, as presented in the report of the on-site audit of Uruguay's meat inspection system, I am forwarding my comments to the deficiencies listed, which were discussed during the final meeting with Dr. Farooq Ahmad.

1. In one establishment, in the boning room, a build of blood residues was observed on the meat packing table and under the metal frame used to hold plastic bags that was attached to a meat packing table.

Corrective action: All the meat packing tables in the boning room were thoroughly cleaned and disinfected. Furthermore, every metal frame used to hold plastic bags was correctly welded to the meat packing table in order to avoid any gap that would cause the build up of blood residues.

2. In one establishment, extraneous material (small stones and debris) was observed in the neck area on approximately 13 beef forequarters in two coolers.

Corrective action: The unclean areas of all the forequarters with extraneous material were thoroughly cleaned before entrance to the boning room. Besides this, 100% of the production was inspected before entrance to the boning room and the damaged hoist used in the quartering area was repaired.

3. In one establishment, heavy dripping condensate was observed on the ceiling in a large cooler where boxed meat was stored on racks. (No product was stored in the affected area at the time of this audit).

It was found that the heavy dripping condensate was due to a malfunction of the refrigeration equipment. Therefore, the deficiency was solved by repairing the said equipment.

4. In one establishment, pieces of rusty metal were observed on the wall in the corridor to the room for retained carcasses.

All the pieces of rusty metal were taken away and the wall was repaired.

5. Uneven welding was observed on the boning tables and the hand wash facility in the boning room and buildups of rust and product residues were observed on thawing equipment for frozen meat.

Uneven welding on the boning tables and the hand wash facility was polished and buildups of rust and product residues were taken away from the thawing equipment.

6. Pieces of fat from the previous day's production were observed on the floor, and an unpleasant odor was noted, in the plate freezer room (which was not in use at the time of this audit).

The plate freezer room was cleaned and the floor was repaired in order to avoid the accumulation of pieces of fat that caused the unpleasant odor. The cleaning crew was retrained and the SSOP manual was reassessed.

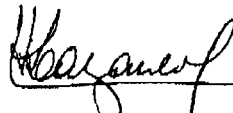
7. In one establishment, a plant employee in the evisceration room was observed to hold the spinal cord of each carcass with his gloved left hand while removing it, and proceeded to contact the carcass with the same hand, thereby creating the potential for cross contamination.

The plant employee was advised about the operation he was performing in a wrongly manner and, consequently, he was retrained in order to avoid any kind of cross contamination during extraction of the spinal cord.

All the preliminary audit findings detailed in Dr. Ahmad's presentation at the audit exit conference have been addressed and corrective actions taken. Area Supervisors have checked them on a one-by-one basis.

I hope these comments help you evaluate our services' response, but please feel free to request any further clarification you may deem necessary.

Looking forward to hearing from you, I remain yours most faithfully,



DR. HECTOR J. LAZANEO
DIRECTOR

cc/ Dr. Francisco Muzio, DGSG, MGAP
Embassy of Uruguay, Washington, DC
US Embassy, Buenos Aires, Argentina
US Embassy, Montevideo, Uruguay



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Montevideo, August 3rd 2007

**MR. DONALD SMART
DIRECTOR
INTERNATIONAL AUDIT STAFF
OFFICE OF INTERNATIONAL AFFAIRS
FOOD SAFETY AND INSPECTION SERVICE, USDA**

Dear Mr. Smart,

I refer to your request to submit comments in response to the information in the audit report made by Dr. Farooq Ahmad, after his on-site audit of Uruguay's meat inspection system, from March 7 through March 29, 2007.

At present, we have studied it and have found no objections to Dr. Ahmad's observations and we have no further comments to make to his report, besides the comments I have forwarded to you in my letter dated April 30, 2007, in relation to the corrective actions taken on the preliminary audit findings.

Looking forward to hearing from you, I remain yours most faithfully,

**DR. HÉCTOR J. LAZANEO
DIRECTOR**

cc/ Dr. Francisco Muzio, DGSG, MGAP
Embassy of Uruguay, Washington, DC
US Embassy, Buenos Aires, Argentina
US Embassy, Montevideo, Uruguay