



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

Don

MAR 6 2006

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

Dear Dr. da Costa:

The Food Safety and Inspection Service (FSIS) conducted an on-site enforcement audit of Brazil's meat inspection system October 19 through November 7, 2005. Comments from the government of Brazil have been included as an attachment to the final audit report. Enclosed is a copy of the final report.

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

Sincerely,

Sally White

Sally White
Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc:

Alan Hraspsky, Agricultural Counselor, US Embassy, Brasilia

Colleen Magro, Trade Specialist, Embassy of Brazil

Robert Macke, Assistant Deputy Administrator, ITP, FAS

Jeanne Bailey, FAS Area Officer

Barbara Masters, Administrator, FSIS

Linda Swacina, Executive Director, FSIA, OIA

Amy Winton, State Department

Karen Stuck, Assistant Administrator, OIA

William James, Deputy Asst. Administrator, OIA

Donald Smart, Director, Program Review, OPEER

Sally White, Director, IES, OIA

Clark Danford, Director, IEPS, OIA

Mary Stanley, Director, IID, OIA

Barbara McNiff, Director, FSIS Codex Program Staff, OIA

AJ Ogundipe, IES, OIA

Country File

FINAL

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

October 19 through November 7, 2005

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
DFA	Delegate for Federal Agriculture Office at State Level
DIPOA	Department of Animal Product Inspection
<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
SIPA	Animal Product Inspection Service
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedures

1. INTRODUCTION

The audit took place in Brazil from October 19 through November 7, 2005.

An opening meeting was held on October 19, 2005, in Sao Paulo with the Central Competent Authority (CCA), which is the Department of Animal Product Inspection (Departamento de Inspeção de Produtos de Origem) (DIPOA). At this meeting, the Food Safety and Inspection Service (FSIS) audit team confirmed the objective and scope of the audit, the audit itineraries, and requested additional information needed to complete the audit of Brazil's meat inspection system.

The audit team was accompanied during the entire audit by representatives from DIPOA and/or representatives from the Animal Product Inspection Service (Serviço de Inspeção de Produtos de Origem Animal) (SIPA).

2. OBJECTIVE OF THE AUDIT

This audit was the third follow-up audit to the enforcement audit that was conducted in March/April 2005. The objective of the audit was to determine if Brazil had implemented corrective actions with regard to government oversight, establishment operations, and laboratory operations.

In pursuit of the objective, the following sites were visited: the headquarters (temporarily moved to Sao Paulo) of DIPOA, four SIPA offices located in four Federal Agriculture Offices at the State Level (Rio Grande do Sul, Minas Gerais, Mato Grosso do Sul, and Sao Paulo), two residue testing laboratories (government labs), four microbiological testing laboratories (two government and two private labs), three meat processing establishments, and five meat slaughter and processing establishments.

Competent Authority Visits			Comments
Competent Authority Visits	Headquarters	1	Sao Paulo
	SIPA	4	Federal Agric Offices at State level
Residue Laboratories		2	
Microbiology Laboratories		4	
Meat Processing Establishments		3	
Meat Slaughter and Processing Establishments		5	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA and SIPA officials to assess the implementation of strategic plans that were developed in May 2005. The second part involved an audit of a selection of records at the CCA and four SIPA offices. The third part involved on-site visits to eight establishments selected by the CCA: five slaughter and processing establishments, and three processing establishments. The fourth part involved visits to four microbiology laboratories (two government and two private labs) and two residue laboratories (government labs) selected by the CCA. These laboratories provide laboratory support for the establishments certified for United States (U.S.) export.

Program effectiveness determinations of Brazil's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP) and Sanitation Performance Standards (SPS), (2) animal disease controls, including the requirements for Bovine Spongiform Encephalopathy, (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems, a testing program for generic *E. coli*, and a testing programs 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.

The audit team assessed the CCA's implementation of strategic plans (new inspection procedures) that were developed in May 2005 by evaluating these five risk areas. In addition, the audit team focused on whether the CCA (1) has effective training programs to implement the new inspection programs and to adopt FSIS laboratory methodologies, (2) has fully implemented all elements of FSIS Directive 5000.1, rev. 1, (3) has fully implemented the new supervisory monthly review and auditing procedures, and (4) has implemented FSIS laboratory methods and procedures in all the laboratories that conduct testing of products intended for export to the U.S..

During all on-site establishment visits, the audit team evaluated the nature, extent and degree to which findings impacted on food safety and public health. The audit team also assessed how inspection services are carried out by the government of Brazil and determined if establishment and inspection system controls were in place to ensure that the meat products exported to the United States are safe, unadulterated and properly labeled.

At the opening meeting, the lead auditor explained to the CCA officials that Brazil's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Brazil. FSIS requirements include, among other things, daily inspection in all certified establishments, supervisory monthly reviews of certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP,

and testing for generic *E. coli*, *Salmonella*, and government oversight/enforcement activities.

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 requirement for *Salmonella* testing for raw products with the exception of the following equivalent measures:

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

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

5. SUMMARY OF PREVIOUS AUDITS

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

During the March/April 2005 enforcement audit, significant, serious deficiencies were found in all aspects of government oversight, payment of inspectors, conflict of interest issues, laboratory operations, and establishment operations. As a result, Brazil voluntarily suspended all its establishments certified for export to the United States in April 2005. In May 2005 Brazil developed new inspection programs in its strategic plans by adopting FSIS Directive 5000.1, rev 1.

FSIS conducted two follow-up audits of Brazil's meat inspection system in June and July 2005. Brazil had developed new inspection programs in its strategic plans by adopting FSIS Directive 5000.1, rev 1 in May 2005. However, it was found that Brazil had not implemented the new inspection programs. FSIS was unable to measure the implementation of these programs during the June 2005 audit. In the two microbiology laboratories audited in June 2005, Brazil did not provide appropriate oversight to ensure that FSIS methods or approved methods were being used to analyze U.S. samples for *Listeria monocytogenes* and *Salmonella*. Methods for detecting and confirming *Listeria monocytogenes* and *Salmonella* were not approved. As a result of these serious deficiencies in laboratory operations, Brazil implemented the following corrective

actions: (1) established a new position (reports to the Chief Veterinary Officer (CVO)), the Special Assistant for Programs of Residues and Microbiology for Exported Meat Products, to coordinate laboratory activities and to provide direct oversight of the laboratories (2) Brazil informed FSIS that it will implement FSIS laboratory methods and procedures in all laboratories that analyze U.S. samples and three government laboratories (LANAGRO in Campinas, LANAGRO in Pedro Leopoldo, LANAGRO in Porto Alegre) will conduct microbiological analysis of ready-to-eat products and residue analyses. No deficiencies were observed in the six establishments audited in June 2005 audit. All six establishments had implemented corrective actions to address the deficiencies identified in the March/April 2005 audit.

During the July 2005 audit, it was found that Brazil did not have an effective training strategy to implement new inspection programs and FSIS laboratory methodologies and procedures. The inspection officials did not demonstrate a clear understanding and practical application of FSIS Directive 5000.1, rev 1, competency, and skills to properly execute the new inspection programs. The laboratory personnel who will implement FSIS laboratory methods and procedures had no clear understanding of FSIS laboratory methods and procedures. Three of the five microbiology laboratories audited in July 2005 did not meet good laboratory practice requirements. Of the eight establishments audited in July 2005, one received a Notice of Intent to Delist for significant deficiencies in SPS requirements. No deficiencies that would affect food safety were observed in the remaining seven establishments.

MAIN FINDINGS

6.1 Government Oversight

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

Each state in Brazil has a Delegate for the Federal Agriculture Office at the State Level (Delegacia Federal de Agricultura do Estado (DFA)). Federal Delegates, also referred to as Federal Superintendents, are political appointees of the Minister of Agriculture.

6.1.1 CCA Control Systems

No deficiencies were observed in organizational structure.

6.1.2 Ultimate Control and Supervision

The CCA has in place strategies to implement the new inspection procedures that were developed in May 2005, and it has implemented all elements of FSIS Directive 5000.1, rev 1, in the establishments certified for U.S. exports. Also, the CCA has implemented the new supervisory monthly review and auditing procedures. However, in all Federal State Offices, a Veterinary Medical Officer (VMO) in charge of one establishment may be assigned to a different establishment to perform supervisory monthly reviews including assessing and evaluating job performance of other VMOs in charge (his/her colleague). This arrangement may **not** provide effective and objective supervisory monthly reviews and may create a conflict of interest.

6.1.3 Assignment of Competent, Qualified Inspectors

The CCA has a training strategy to implement new inspection programs and to adopt FSIS laboratory methodologies, and it has provided training on new inspection programs to about 150 VMOs and Auxiliary Inspectors assigned to certified establishments. The training strategy includes workshops that provide practical applications of new inspection programs in 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 RIISPOA. The CCA has the authority and responsibility to enforce the inspection laws, and it has developed new inspection policies and procedures by adopting FSIS inspection procedures to ensure effective enforcement of U.S. requirements. Although elements of FSIS Directive 5000.1, revision 1 were implemented in establishments certified for U.S. export, one establishment received a Notice of Intent to Delist (NOID) for significant deficiencies in SSOP and SPS requirements.

6.1.5 Adequate Administrative and Technical Support

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

6.2 Headquarters Audit

The audit team assessed whether the CCA has strategies in place to implement the new inspection programs that were developed in May 2005. In pursuit of this, FSIS interviewed key officials specifically to verify whether the CCA has: (1) effective training programs to implement the new inspection programs and to adopt FSIS laboratory methodologies, (2) fully implemented all elements of FSIS Directive 5000.1, rev. 1, (3) fully implemented the new supervisory monthly review and auditing procedures, (4) fully implemented FSIS laboratory methods and procedures in all

laboratories that conduct testing of products intended for U.S. export. Various supporting records and documents related to inspection programs and policies were examined and verified to confirm CCA officials' responses.

6.3. Federal Agriculture Office at State Level (SIPA Offices)

SIPA offices are responsible for direct implementation of U.S. requirements and inspection oversight activities over establishments certified for U.S. export. The audit team conducted reviews of four SIPA offices to assess the effectiveness of delivery of newly developed inspection programs and implementation strategies. In pursuit of this, FSIS interviewed key officials in four SIPA offices that are responsible for managing the delivery of inspection. These were:

- SIPA Office in Porto Alegre, Rio Grande do Sul State
- SIPA Office in Belo Horizonte, Minas Gerais State
- SIPA Office in Campo Grande, Mato Grosso do Sul State
- SIPA Office in Sao Paulo, Sao Paulo State

Available supporting records and documents related to field inspection oversight activities were examined by the auditors.

In addition, FSIS team interviewed VMOs in charge of three establishments certified for U.S. export. These VMOs are directly involved in the implementation of the new inspection programs. The purpose of the interviews was to determine whether: (1) VMOs in charge have a clear understanding of the new inspection programs, and (2) VMOs in charge are competent and have necessary skills to properly execute the new inspection programs. The VMOs in charge have a clear understanding and necessary skills to implement the new inspection programs.

7. ESTABLISHMENT AUDITS

Although it was agreed that the CCA would select establishments for audit that had implemented appropriate corrective actions to meet FSIS requirements, of the eight establishments audited, one received a NOID for significant deficiencies in SSOP and SPS requirements. No deficiencies that would affect food safety were observed in the remaining seven establishments.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis was placed on the application of procedures and standards that are equivalent to United States requirements.

8.1 Residue Laboratory Audit

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 CCA provided the following list of laboratories for residue analysis:

- LANAGRO (government lab) in Campinas
- LANAGRO (government lab) in Pedro Leopoldo

FSIS audited these two residue laboratories. No deficiencies were observed.

8.2 Microbiology Laboratory Audit

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples.

The following laboratories conduct microbiological analysis on U.S. meat products:

- SFDK (private lab) in Sao Paulo
- CERELAB (private lab) in Sao Paulo
- LACI (private lab) in Lins
- Famato (private lab) in Cuiaba
- LANAGRO (government lab) in Campinas
- LANAGRO (government lab) in Pedro Leopoldo

FSIS selected four laboratories for audit. The laboratories selected include: CERELAB (private lab) in Sao Paulo, Famato (private lab) in Cuiaba, LANAGRO (government lab) in Campinas, and LANAGRO (government lab) in Pedro Leopoldo. Of the four microbiology laboratories audited, two laboratories did not meet FSIS laboratory requirements. No deficiencies were observed in LANAGRO (government lab) in Pedro Leopoldo, and CERELAB (private lab) in Sao Paulo. The auditor observed the following deficiencies in two laboratories:

FAMATO, a private microbiology laboratory in Cuiaba.

- 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.

LANAGRO, a government microbiology laboratory in Campinas.

- On the day of the audit, the laboratory was not yet prepared for microbiological testing for ready-to-eat samples from establishments certified for U.S. export. The laboratory was:

- Not taking corrective actions on incubator temperature readings that were often outside the expected range.
- Not using calibrated working thermometers for incubator temperature measurements.
- Not servicing autoclaves on an annual basis.
- The CCA immediately suspended the Campinas laboratory for microbiological testing of U.S. product.

9. SANITATION CONTROLS

As stated earlier, the FSIS audit team focused on five areas of risk to assess Brazil's meat inspection system. The first of these risk areas that the audit team reviewed was Sanitation Controls.

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.

One establishment received a NOID for serious deficiencies in SSOP requirements:

- Product residues including grease, dried blood, and fat from previous days' operations were observed on food contact surfaces of offal racks and employees' scabbards in slaughter and offal rooms.
- During slaughter operations, exposed beef products including beef carcasses, beef viscera, and beef heads were in contact with different non-food contact equipments such as ladders, inedible containers, employees' platform, and hide puller chain in different locations.
- Exposed product contact equipment including metal working tables and racks have open gaps, rough surfaces, and crack edges that make thorough cleaning difficult to prevent adulteration of products.

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.

One establishment received a NOID for serious deficiencies in SPS requirements:

- Facilities were not properly maintained to prevent conditions that could lead to insanitary conditions and to preclude entrance of flies and vermin such as mice.
- Holes, cracks, gaps, and rubbish and accumulation of dirt in the floor drains were observed in different locations where exposed products were handled.
- Numerous flies were observed in the slaughter rooms where exposed products were handled.

- Beaded condensate from overhead ceiling was observed in a room where packaged products were handled.
- Dripping condensate from exhaust system that was not cleaned and sanitized daily was falling on the floor (close to automatic beef viscera conveyor) in the slaughter room where exposed products were handled.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS audit team reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, control over condemned and restricted product, implementation of the requirements for Bovine Spongiform Encephalopathy, and procedures for sanitary handling of returned and reconditioned product.

No deficiencies were observed.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS audit team reviewed was Slaughter/Processing Controls. The controls include the following areas: humane handling and slaughter of animals, ante-mortem inspection procedures; ante-mortem disposition; post-mortem inspection procedures; post-mortem disposition; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments, implementation of a generic *E. coli* testing program in slaughter establishments, and a testing program for ready-to-eat products.

11.1 Humane Handling and Slaughter

No deficiencies were observed.

11.2 HACCP Implementation.

All eight establishments selected for audit were required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

In two establishments, HACCP on-going requirements regarding recordkeeping were not met:

- HACCP records documenting the monitoring of CCPs did not include the recording of initials or a signature.

11.3 Testing for Generic *E. coli*

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

Five 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.

No deficiencies were observed.

11.4 Testing of Ready-to-Eat Products

Five of eight establishments were producing ready-to-eat products that are subject to the testing requirements for *Listeria monocytogenes* and *Salmonella*.

No deficiencies were observed.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS audit team 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.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS audit team reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements, the testing program for *Salmonella* in raw products, daily inspection, monthly reviews, and inspection system controls.

13.1 Daily Inspection in Establishments

No deficiencies were observed.

13.2 Testing for *Salmonella* in Raw Product

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

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

No deficiencies were observed.

13.3 Species Verification

Brazil is exempt from species verification testing and is following all controls to maintain the exemption.

13.4 Monthly Reviews

No deficiencies were observed.

13.5 Inspection System Controls

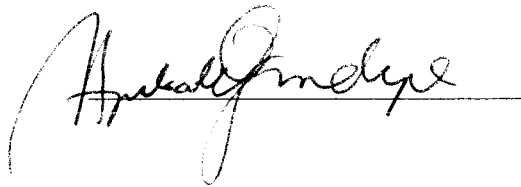
The CCA was required to demonstrate that all government inspectors assigned to establishments certified for U.S. export were being paid by government. Serious deficiencies were observed in payment of inspectors and conflict of interest issues during the March/April 2005 enforcement audit. Although the CCA still has contracted inspectors (inspectors loaned and paid by the municipal government), it has implemented corrective actions to resolve the conflict of interest issues. The CCA will send an official letter to FSIS describing the permanent corrective actions to address this issue.

14. CLOSING MEETING

A closing meeting was held on November 7, 2005, in Sao Paulo with the CCA. At this meeting, the preliminary findings and conclusions from the audit were presented by the lead auditor.

The CCA understood and accepted the findings.

AJ Ogundipe
Lead Auditor

A handwritten signature in black ink, appearing to read 'AJ Ogundipe', written over a horizontal line.

15. ATTACHMENTS

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

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Kerry Do Brasil Ltda Tres Coracoes, Minas Gerais	2. AUDIT DATE 10/20/2005	3. ESTABLISHMENT NO. SIF 471	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, 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	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	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/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment:

Establishment # SIF 471

Date: 10/22 2005

Processing Operation

22.51. The monitoring records of critical control points of the HACCP plan did not include the initial or signature. 9 CFR 417.5(b)

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry 11/09/05

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Pampeano Alimentos S/A Fabricas de Conservas Hulha Negras, Rio Grande do Sul	2. AUDIT DATE 10/24. 25/2005	3. ESTABLISHMENT NO. SIF 226	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, 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	<input type="checkbox"/>
8. Records documenting implementation.		34. Species Testing	<input type="checkbox"/>
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	<input type="checkbox"/>
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	<input type="checkbox"/>
25. General Labeling		53. Animal Identification	<input type="checkbox"/>
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	<input type="checkbox"/>
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	<input type="checkbox"/>
27. Written Procedures	<input type="checkbox"/>	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	<input type="checkbox"/>	56. European Community Directives	<input type="checkbox"/>
29. Records	<input type="checkbox"/>	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	<input type="checkbox"/>	59.	
31. Reassessment	<input type="checkbox"/>		
32. Written Assurance	<input type="checkbox"/>		

60. Observation of the Establishment

Establishment = SIF 226

Date: 10/24, 25/2005

Processing Operation

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

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE/AND DATE

Dr. Faizur R. Choudry 11/09/05

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Friboi Ltda Barra do Garcas Mato Grosso	2. AUDIT DATE 10/26/2005	3. ESTABLISHMENT NO. SIF 42	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, 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.		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	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	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/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	
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:

Establishment = SIF 42

Date: 10/26/2005

Slaughter & Cut-up/Boning Operation

41/51. Beaded condensation was observed on ceilings in a room where packaged product was being handled. 9 CFR 416.2 (d)

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry 11/09/05

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Friboi Ltda Compo Grande Mato Grosso do Sul	2. AUDIT DATE 10/27/2005	3. ESTABLISHMENT NO. SIF 1662	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, 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.		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:

Establishment # SIF 1662

Date: 10/27/2005

Slaughter & Cut-up Boning Room

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

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry 11/09/05

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Bertin Ltda Votuporanga, Sao Paulo	2. AUDIT DATE 10/31/2005	3. ESTABLISHMENT NO. SIF 2023	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, 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	<input type="checkbox"/>
8. Records documenting implementation.		34. Species Testing	<input type="checkbox"/>
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	<input type="checkbox"/>
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	<input type="checkbox"/>
25. General Labeling		53. Animal Identification	<input type="checkbox"/>
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	<input type="checkbox"/>
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	<input type="checkbox"/>
27. Written Procedures	<input type="checkbox"/>	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	<input type="checkbox"/>	56. European Community Directives	<input type="checkbox"/>
29. Records	<input type="checkbox"/>	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	<input type="checkbox"/>	59.	
31. Reassessment	<input type="checkbox"/>		
32. Written Assurance	<input type="checkbox"/>		

60. Observation of the Establishment

Establishment # SIF 2023

Date: 10/31, 2005

Processing Operation

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

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry 11/09/05

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Industria E Comercio de Carnes Minerva Ltda. Av. Antonio Manco Bernardes S/N Barretos, Sao Paulo	2. AUDIT DATE 11/01 2005	3. ESTABLISHMENT NO. SIF 401	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, 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.		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

Establishment = SIF 421

Date: 11/01/2005

Slaughter & Processing Operations

22/51. The monitoring records of critical control points of the HACCP plan did not include the initial or signature. 9 CFR 417.5(b)

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry

11/09/05

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Friboi Ltda. Andradina, Sao Paulo	11.03/2005	SIF 385	BRAZIL
5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT	
Dr. Faizur R. Choudry, DVM.		<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.		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

Establishment # SIF 0385

Date: 11/03/2005

Slaughter/Processing Operation

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

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry 11/03/05

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Independencia Alimentos Ltd. Nova Andradina Mato Grosso Do Sul (MS)	2. AUDIT DATE 11/04/2005	3. ESTABLISHMENT NO. SIF 49	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, 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.		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.	X	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	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	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. Notice of Intent to Delist (NOID)	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment = SIF 49

Date: 11/04/2005

Slaughter & Cut-up Boning Operation

- 12/51. a) Product residues and dried blood from previous day's operation were observed on food contact-surfaces of offal racks in the offal room. 9 CFR 416.15
- b) Dried pieces of fat and grease from previous day's operation were observed on employees' scabbards next to the slaughter room. 9 CFR 416.15
- c) Fore-shanks of beef carcasses were contacting inedible container and ladder at the carcass trimming station in the slaughter room. 9 CFR 416.15
- d) Beef viscera from automatic viscera conveyor pans was contacting employee's platform at the carcass evisceration station. 9 CFR 416.15
- e) The skinned beef heads were contacting dirty hide puller chain and hide at the hide removal station. 9 CFR 416.15
- f) Numerous metal tables and racks with open gaps and rough cracked edges were observed in the boning room and offal room. 9 CFR 416.15

- 39/51. a) Gaps at the bottoms and sides of doors were not sealed properly to prevent the entry of rodents and other vermin in the offal and slaughter room. Numerous flies were observed in the slaughter room. 9 CFR 416.2(b)
- b) Pipe for the overflow water in the potable water tank was not protected to prevent the entrance of insects and rodents. 9 CFR 416.2(b)
- c) Partially covered floor drains were found with rubbish and accumulation of dirt and were not maintained in a manner sufficient to prevent the creation of insanitary conditions in the dry storage room. Numerous holes through the screen windows to outside and gaps at the bottoms and sides of doors were not sealed properly to prevent the entry of rodents and other vermin and dead insects were observed in the room. There was no complete partition between dry storage room and other equipment and machines that were stored in the same room. 9 CFR 416.2 (b)

41/51.a) Dripping condensate, from overhead exhaust system that was not cleaned/sanitized daily, was falling on the floor (close to automatic beef viscera conveyor) in the slaughter room where exposed products were handled. GOB inspection officials took corrective actions temporarily. 9 CFR 416.2 (d)

58. Government Of Brazil (GOB) meat inspection officials gave a Notice of Intent to Delist to Establishment SIF 49 regarding the inadequate implementation requirements for Sanitation Standard Operating Procedures (SSOP), Sanitation Performance Standards (SPS), and Government Oversight Enforcement, effective November 4, 2005. GOB inspection official is to evaluate the adequacy of corrective actions and provide a full report to FSIS.

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry 11/04/05

Informal Translation

Official Letter Number 011/2006, Dated February 17, 2006.

Mr. Counselor,

I acknowledge receipt of your letter with the attached copy of the " REPORT OF ON ENFORFORCEMENT AUDIT CARRIED OUT IN BRAZIL COVERING BRAZIL'S MEAT INSPECTION SYSTEM, OCTOBER 19 THROUGH NOVEMBER 7, 2005 sent by Dr. Sally White, Director, Equivalency Staff, FSIS/USDA.

Although I have no further comments to make, I would like to specify that all non conformities identified have been promptly corrected.

Sincerely

Dr. Nelmon Oliveira da Costa
Director, DIPOA/SDA



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

Of. 011 /2006 /DIPOA

Brasília, 17 de fevereiro de 2006

Sr. Conselheiro,

Apraz-me cumprimentá-lo e ao mesmo tempo acusar o recebimento do " REPORT OF ON ENFORFORCEMENT AUDIT CARRIED OUT IN BRAZIL COVERING BRAZIL'S MEAT INSPECTION SYSTEM, OCTOBER 19 THROUGH NOVEMBER 7, 2005 -, encaminhado pela Sra Sally White, Diretora de Equivalência Internacional do FSIS/USDA.

Não há comentários com relação aos achados relatados; no entanto todas as não conformidades identificadas durante a auditoria foram prontamente corrigidas.

Atenciosamente

NELMON OLIVEIRA DA COSTA
DIRETOR DO DIPOA/SDA

Ilmo Sr. Alan D. Hrapsky
Conselheiro de Assuntos de Agricultura
Embaixada dos Estados Unidos da América
SES – Avenida das Nações – Quadra 801 – lote 3
70403 – 00 Brasília – DF