MEMORANDUM FOR THE FILE

The purpose of this memorandum is to conclude the evaluation of the corrective action plan sent by Chile after the August 9 through 18, 2005 audit. The further actions taken by the government of Chile are attached to this memorandum and summarized below.

During the August 2005 audit, FSIS documented the following deficiency: In both establishments, species verification testing was not being conducted as required.

The Government of Chile responded to the FSIS audit report with the following Corrective Action (Letter received on 11/16/2005): The SAG is prepared to implement the verification of species test. It only needs to purchase the corresponding kits. This order is currently being processed. The species verification testing will take place in the Food Microbiologic Laboratory of the Bacteriologic Unit of the Lo Aguirre official laboratory which is equipped with the appropriate infrastructure and trained personnel to carry out this type of analysis with a technique approved as USDA, FSIS protocol.

Further actions taken by the Government of Chile in response to the March 26, 2007 request by FSIS (Letter received on 4/5/2007): The following correspondence was sent to Chilean inspection personnel:

- "From livestock Protection Division to SAG lab" is the Fax N° 20, sent on January the 4th, 2006 that gives instructions to begin the Official Species Verification in raw meat and cooked products (poultry, pork, bovine and ovine) according to the USDA-FSIS directive 10230.1, included in the MLG 17.01 chapter 21.
- "From Livestock Protection to SAG Regional Directors" is the Fax N° 528, sent on March 20th, 2006 that gives the instruction to the regional SAG in order to begin the sampling and follow a specific testing protocol scheme described.
- "From SAG laboratory to Livestock Protection" is the document that the SAG lab sent to the Livestock protection division on January 9th, 2007 regarding the implementation of the F.A.S.T. test during the year 2006 and also it has all the results of the 2006 monitoring program.
- "From Livestock Protection to SAG Regional Directors" is the Fax N°401 sent on March 5th, 2007 gives the instruction to begin the sampling and follow a specific testing/sampling scheme.

The government of Chile provided a brief summary of the contents in each document. FSIS verified the content of these documents through an International Equivalence Staff Officer fluent in Spanish. In addition, the documents were sent for official translation and will be placed in the country file upon completion.

FSIS believes that Chile has sufficient controls in place to ensure that species verification testing is being performed. FSIS auditors found that species verification testing was being performed in beef slaughter establishments during the March 22 through April 13, 2006 audit.

Earlier this year, FSIS began notifying countries that FSIS discontinued the use of testing in the establishment to determine the species in meat and poultry product formulations. Today, as scheduled by FSIS' Performance Based Inspection System, inspectors visually observe formulations of product instead of sampling product through the use of a species verification testing kit. This task is scheduled to be performed once each year in each establishment producing processed meat or poultry products. However, the inspector may observe formulations of product more frequently than scheduled, and, if the inspector has reason to believe a particular product is misbranded, product samples may be taken and submitted to an FSIS laboratory for species verification testing.

As a result of this change in FSIS policy for species verification testing, FSIS advised countries that there are three options that can be utilized by their inspection service to meet the species verification testing requirement for processed meat and poultry products exported to the United States. These options are: (1) continue to conduct species verification testing via testing in the establishment or other equivalent means, (2) adopt product formulation checks or an equivalent procedure, or (3) submit another alternative measure for an equivalence determination.

Dr. Andreas Keller USDA, FSIS, OIA, IES

Todd Furey

USDA, FSIS, OIA, IES