



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

For

Dr. Ligia Quirós Gutiérrez, Chief
Department of Meat Inspection
Ministry of Agriculture and Livestock
Post Office Box 10094
1000 San Jose, Costa Rica

MAY 5 2006

Dear Dr. Quirós:

The Food Safety and Inspection Service (FSIS) conducted its annual audit of Costa Rica's meat inspection system October 12 through October 27, 2005. No comments to the draft final audit report were received. Enclosed is a copy of the final report.

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

Sincerely,

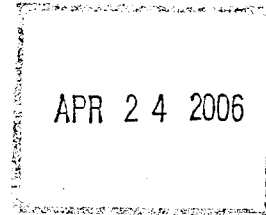
Sally White JD

Sally White
Director
International Equivalence Staff
Office of International Affairs

Enclosure

Cc: Katherine Nishiura, Attaché, US Embassy, San Jose
Laura Dachner, Minister Counselor, Embassy of Costa Rica
Bob Macke, Assistant Deputy Administrator, International Trade Policy, FAS
Jeanne Bailey, FAS Area Officer
Amy Winton, State Department
Barbara Masters, Administrator, FSIS
Karen Stuck, Assistant Administrator, OIA, FSIS
Bill James, Deputy Assistant Administrator, OIA, FSIS
Linda Swacina, Executive Director, FSIA, OIA, FSIS
Donald Smart, Director, Program Review, OPEER, FSIS
Sally White, Director, IES, OIA, FSIS
Clark Danford, Director, IEPS, OIA, FSIS
Mary Stanley, Director, IID, OIA, FSIS
Barbara McNiff, Director, FSIS Codex Staff
Shannon McMurtrey, IES, OIA, FSIS
Country File

FINAL



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

OCTOBER 12 THROUGH OCTOBER 27, 2005

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

APHIS	Animal and Plant Health Inspection Service
CCA	Central Competent Authority - Ministry of Agriculture and Livestock, Division of Animal Health (Ministerio de Agricultura y Ganaderia, Direccion de Salud Animal)
CVO	Chief Veterinary Officer
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
MAG	Ministry of Agriculture and Livestock (Ministerio de Agricultura y Ganaderia)
MAGDSA	Ministry of Agriculture and Livestock, Division of Animal Health (Ministerio de Agricultura y Ganaderia, Direccion de Salud Animal)
MAGDZE	Ministry of Agriculture and Livestock, Division of Zoo Sanitary Export (Ministerio de Agricultura y Ganaderia)
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point System
<i>Salmonella</i>	<i>Salmonella</i> species
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedures

1. INTRODUCTION

The audit took place in Costa Rica from October 12 to October 27, 2005.

An opening meeting was held on October 12, 2005 in San Jose, Costa Rica with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the audit itinerary, and requested additional information needed to complete the audit of Costa Rica's meat inspection system.

The auditor was accompanied during the entire audit by a representative from the MAGDSA, the Ministry of Agriculture and Livestock, Division of Animal Health and, when appropriate, representatives from the local establishment inspection offices.

2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, two laboratories performing analytical testing on United States-destined product, two meat slaughter/processing establishments, and one meat processing establishment.

Competent Authority Visits			Comments
Competent Authority	Central	1	MAGDSA in San Jose
	Local	3	Establishment Level
Laboratories		2	Government residues and microbiology laboratory
Meat Slaughter Establishments		2	Alajuela and Heredia
Processing Establishment		1	Belen-Heredia

3. PROTOCOL

This on-site audit was conducted in three parts. One part involved visits with MAGDSA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters. The third part involved on-site visits to three establishments. The fourth part involved visits to two government laboratories. The Ministry of Agriculture and Livestock (Ministerio de Agricultura y Ganadería – MAG) was conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella*. MAG Lanaseve Residue Laboratory was conducting analysis of field samples for Costa Rica's national residue control program.

Program effectiveness determinations of Costa Rica's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation

Standard Operating Procedures (SSOP), (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) programs and testing programs for generic *Escherichia coli* (*E. coli*), (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. Costa Rica's meat 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 meat inspection services are carried out by the government of Costa Rica and determined if establishment and inspection system controls were in place to ensure that the meat products that Costa Rica exports to the United States are safe, unadulterated and properly labeled.

At the opening meeting, the auditor explained to the Ministry of Agriculture and Livestock [Ministerio de Agricultura y Ganaderia (MAG)] officials that the Costa Rican inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Costa Rica. FSIS requirements include daily inspection in all 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, species verification testing, requirements for HACCP, SSOP, testing for generic *E. coli* and *Salmonella*, and government oversight/enforcement activities.

Currently, Costa Rica has one equivalence determination, which was issued in February 2005. Establishment personnel collect samples of product for generic *E. coli* testing and analysis is conducted in official government laboratories.

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. Code 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP.

5. SUMMARY OF PREVIOUS AUDITS

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

The following deficiencies were identified during the June 2004 FSIS enforcement audit of Costa Rica's meat inspection system:

- In one establishment, non-ambulatory animals are slaughtered at the end of the day's regular slaughter. This is in contradiction to a January 16, 2004, letter in which Costa Rica informed FSIS that non-ambulatory disabled cattle would not be introduced in the slaughterhouse and that they would be destroyed to avoid entering the human or

animal food chain. While this establishment remained delisted because of the last FSIS audit finding, the establishment was presented as fully meeting FSIS requirements and therefore subject to all FSIS regulations.

- In one establishment, three assigned inspectors were being paid directly by the establishment.

All deficiencies observed during the previous September 2003 routine annual audit had been corrected and verified. No repeat deficiencies were observed during the June 2004 enforcement audit.

The following deficiency was identified during the November 2004 FSIS enforcement audit of Costa Rica's meat inspection system:

- In one slaughter establishment, Costa Rica was not following the equivalent measure for generic *E. coli* sample collection. Government inspection officials were collecting the *E. coli* samples for analysis at the establishment's laboratory.
 - At that time in Costa Rica, an equivalence determination for generic *E. coli* testing had been made that official government inspectors take the samples and those samples are analyzed by government laboratories.

All deficiencies observed during the previous June 2004 enforcement audit had been corrected and verified. No repeat deficiencies were observed during the November 2004 enforcement audit.

6. MAIN FINDINGS

6.1 Government Oversight

Meat inspection activities are centrally located in San Jose and are administered by the MAGDSA. MAGDSA is a subdivision within the MAG Division of Animal Health. The Chief of MAGDSA has direct authority over all meat establishments, including those certified to export meat to the United States. The official list of establishments is maintained and controlled by the Chief of MAGDSA. New official guidelines and regulations are issued by the CCA headquarters in San Jose.

Implementation of inspection activities is accomplished by the Veterinarian-in-Charge of each official establishment, with oversight from headquarters. Verification of implementation is accomplished by monthly supervisory reviews conducted by the Chief of MAGDSA. The central headquarters office has the legal and regulatory authority to administer the meat inspection program. There are no other levels of authority.

Department of the National Laboratory for the Veterinary Service [Departamento de Laboratori Nacional de Servicios Veterinarios (Lanaseve)], the national reference laboratory in San Jose is subdivision of MAGDSA. Costa Rica's Lanaseve Microbiology Laboratory and Lanaseve Residue Laboratory are both located in San Jose near MAGDSA Headquarters. Both are subdivisions to the Division of Animal Health. The two divisions of the government laboratory perform both chemical and microbiological testing of meat products.

MAGDZE employs approximately 17 veterinarians, eight of which are located in establishments. MAGDZE also employs 14 auxiliary inspectors in establishments to aid in carrying out its domestic and export meat inspection programs and related enforcement activities. Total personnel dedicated to the inspection and certification of products of animal origin is about 33. MAGDZE is a subdivision under the MAG Division of Animal Health, which employs about 191 people.

6.1.1 CCA Control Systems

MAGDSA has the organizational structure and staffing to ensure uniform implementation of United States requirements.

6.1.2 Ultimate Control And Supervision

Control of inspection activities and supervision of non-veterinary inspectors at the establishment level is the responsibility of the Veterinarian-in-Charge. The Veterinarians-in-Charge are directly supervised by the Chief of the Meat Inspection Division. Staffing appeared adequate in individual establishments.

6.1.3 Assignment of Competent, Qualified Inspectors

The central headquarters is responsible for ensuring adequate training of inspectors before assignment to an official establishment. On the job training is carried out by the Veterinarian-in-Charge in each establishment. Continuous daily inspection by official government inspectors was provided for each of the three establishments certified to export meat products to the United States.

6.1.4 Authority and Responsibility to Enforce the Laws

The CCA and the official inspection personnel have the authority and responsibility to enforce United States' requirements. The Chief of MAGDZE and the Veterinarians-in-Charge at each establishment are authorized to enforce the government of Costa Rica's meat inspection legislation and United States' import requirements, including animal health and welfare, control of animal disease, veterinary medicines, and the production of safe foods of animal origin. The Chief of MAGDZE and the Veterinarians-in-Charge at each establishment have the legal authority to suspend operations and delist certified establishments to prevent the export of unsafe meat to the United States.

6.1.5 Administrative and Technical Support

MAGDSA has the ability to support a third-party audit.

6.2 Headquarters Audit

The auditor met with the Chief of the Meat Inspection Division and other government officials at MAG and MAGDZE headquarters to obtain a better understanding of the oversight and enforcement responsibilities of the government of Costa Rica. In addition, the

auditor was informed of the legislative and budgetary reforms and changes the government has undertaken to enhance Costa Rica's inspection system.

6.2.1 Audit of Regional and Local Inspection Sites

Costa Rica has no other offices other than the central headquarters office in San Jose. Results of the audits of the inspection offices located in the individual establishments are reported in Section 13 of this report.

The auditor concluded that:

- All relevant regulations, notices, and other inspection documents and records were disseminated from headquarters to the three establishments. This activity was accomplished by hard copy and e-mail.
- Inspection personnel demonstrated adequate knowledge of inspection requirements relative to the export of meat to the United States.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of three establishments. Two of the establishments audited conducted both slaughtering and processing operations. The third establishment audited was only conducting processing operations and was receiving all product from one of the aforementioned slaughter and processing establishments. No establishments were delisted by MAGDSA or received a Notice of Intent to Delist (NOID).

Specific deficiencies are noted on the attached Foreign Establishment Audit Checklists.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDIT

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

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 laboratories were reviewed:

The Ministerio de Agricultura y Ganaderia Seccion de Microbiologia de Alimentos (MAG microbiology laboratory) in San Jose and the MAG Lanaseve Residue laboratory (MAG residue laboratory) in San Jose.

The following deficiency was noted:

- The residue laboratory is using muscle tissue to analyze diethylstilbestrol instead of liver and kidney tissue.

9. SANITATION CONTROLS

As previously stated, FSIS focuses on five areas of risk to assess an exporting country's meat inspection system. The first of these risk areas that the audit team reviewed was Sanitation Controls.

Costa Rica's meat inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene and practices, and good product handling and storage practices.

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

9.1 SSOP

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 the three establishments audited were found to meet the basic FSIS regulatory requirements.

- In two of the three establishments audited, the specific deficiencies for SSOP on-going requirements were not implemented.

The specific deficiencies are noted in the attached Foreign Establishment Audit Checklists.

9.2 Sanitation

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

The specific deficiencies are noted in the attached Foreign Establishment Audit Checklists.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS audit team reviewed was Animal Disease. These controls include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The audit team determined that the inspection system of Costa Rica had adequate controls in place. No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit. The Animal and Plant Health Inspection Service (APHIS) continues to have import restrictions on pork products due to the presence in Costa Rica of Hog Cholera (Classical Swine Fever).

11. SLAUGHTER/PROCESSING CONTROLS

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

The controls also include the implementation of HACCP systems in all establishments and implementation of a testing program for generic *E. coli* in slaughter establishments.

11.1 Humane Handling and Humane Slaughter

Controls for the humane handling and humane slaughter of cattle were in place and being followed as required.

11.2 HACCP Implementation

All establishments certified to export meat products to the United States, with the exception of facilities dedicated to cold storage, are required to have adequately developed and implemented HACCP programs. The HACCP programs were evaluated according to the criteria employed in the United States' domestic inspection program.

All three establishments audited were required to meet the HACCP requirements and had adequately implemented them.

11.3 Testing for Generic *E. coli*

Costa Rica has adopted the FSIS regulatory requirements for generic *E. coli* testing with the exception of the following equivalent measures. Establishment personnel collect samples of product for generic *E. coli* testing and analysis is conducted in official government laboratories.

Costa Rica was following the equivalent measure in the two slaughter establishments audited, except for the following deficiencies:

- In one establishment, Costa Rica did not follow the equivalence determination for generic *E. coli* sample collection. Government inspection officials were collecting the *E. coli* samples for analysis at a government laboratory.
- In a second slaughter establishment, Costa Rica again did not follow the equivalence determination for generic *E. coli* sample collection. Establishment personnel were collecting the *E. coli* samples for analysis at a private laboratory.

- In Costa Rica an equivalence determination for generic *E. coli* testing has been made that establishment personnel collect the samples and those samples are analyzed by government laboratories.

11.4 Testing for *Listeria monocytogenes*

None of the three establishments audited was producing ready-to-eat meat products for export to the United States. As a result, the FSIS requirements for *Listeria monocytogenes* testing do not apply.

12. RESIDUE CONTROLS

The fourth of the five risk areas FSIS audit team reviewed was Residue Controls. These 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.

The following deficiency was noted:

- The residue laboratory is using muscle tissue to analyze diethylstilbestrol instead of liver and kidney tissue.

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 and the testing program for *Salmonella* species.

13.1 Daily Inspection in Establishments

Daily inspection was being conducted as required in the three establishments audited.

13.2 Testing for *Salmonella*

Costa Rica has adopted the FSIS regulatory requirements for testing for *Salmonella* species.

Two of the three 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 for slaughter establishments.

Testing for *Salmonella* was properly conducted in both slaughter establishments where it was required.

13.3 Species Verification

Species verification was being conducted as required.

13.4 Monthly Reviews

In all three establishments, monthly supervisory reviews 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.

Controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other countries for further processing.

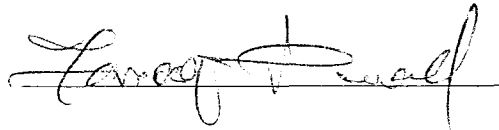
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on October 27, 2005, in San Jose 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

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

15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Forms

Foreign Country Response to Draft Final Audit Report *(no comments received)*

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Coopemontecillos Montecillos, Alajuela Box 290 Alajuela Costa Rica	2. AUDIT DATE Oct. 19, 05	3. ESTABLISHMENT NO. 0008	4. NAME OF COUNTRY Costa Rica
5. NAME OF AUDITOR(S) Dr. Farooq Ahmad		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.	X	38. Establishment Grounds and Pest Control	X
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	X	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

Costa Rica

Est. # 0008 (slaughter/processing)

Date of audit: Oct. 19, 2005

- 12/51 When the organic solution was sprayed to the carcasses, it was splashing on the overhead carcass rail and dripping back on the carcasses. 9 CFR 416.15 (a)

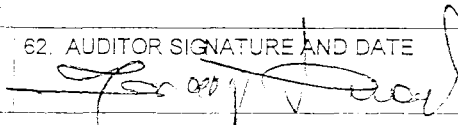
- 28/51 Government inspection officials were collecting the generic *E. coli* samples for analysis at a government laboratory.
Costa Rica has one equivalence determination, which was issued in February 2005. Establishment personnel collect samples of product for generic *E. coli* and analysis is conducted in official government laboratories.

- 38 The hallway outside door had an open space at the bottom which may allow the entry of pest and rodents into the establishment. 9 CFR 416.2 (b) (3)

61. NAME OF AUDITOR

Dr. Farooq Ahmad

62. AUDITOR SIGNATURE AND DATE

 12/27/05

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION El Arco La Ribera de Belen Heredia Costa Rica	2. AUDIT DATE Oct. 14, 05	3. ESTABLISHMENT NO. 0012	4. NAME OF COUNTRY Costa Rica
5. NAME OF AUDITOR(S) Dr. Farooq Ahmad		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	
		45. Equipment and Utensils	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46. Sanitary Operations	
18. Monitoring of HACCP plan.		47. Employee Hygiene	X
19. Verification and validation of HACCP plan.		48. Condemned Product Control	
20. Corrective action written in HACCP plan.		Part F - Inspection Requirements	
21. Reassessed adequacy of the HACCP plan.		49. Government Staffing	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		50. Daily Inspection Coverage	
Part C - Economic / Wholesomeness		51. Enforcement	X
23. Labeling - Product Standards		52. Humane Handling	
24. Labeling - Net Weights		53. Animal Identification	
25. General Labeling		54. Ante Mortem Inspection	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		55. Post Mortem Inspection	
Part D - Sampling Generic E. coli Testing		Part G - Other Regulatory Oversight Requirements	
27. Written Procedures		56. European Community Directives	O
28. Sample Collection/Analysis	X	57. Monthly Review	
29. Records		58.	
Salmonella Performance Standards - Basic Requirements		59.	
30. Corrective Actions			
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Costa Rica

Est. # 0012 (slaughter processing)

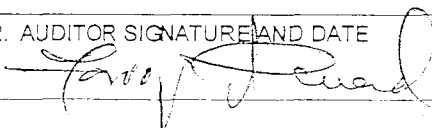
Date of audit: Oct. 14, 2005

- 28/51 Establishment personnel were collecting the generic *E. coli* samples for analysis at a private laboratory. Costa Rica has one equivalence determination, which was issued in February 2005. Establishment personnel collect samples of product for generic *E. coli* and analysis is conducted in official government laboratories.
- 47/51 In the locker room, the clean aprons were stored on the open shelves and they were coming in contact with the employees' back packs. 9 CFR 416.5 (b)

61. NAME OF AUDITOR

Dr. Farooq Ahmad

62. AUDITOR SIGNATURE AND DATE



12/27/05

Country Response Not Received