United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

APR 15 2004

Dr. Nelmon Oliveira Costa
Director, Department of Inspection for
Products of Animal Origin/SDA
Pecuaria e Abastecimento (MAPA)
Ministry of Agriculture
Block D, 4th Floor, Room 407
70043-900 Brasilia DF
Brazil

Dear Dr. Costa:

The Food Safety and Inspection Service has completed an on-site audit of Brazil's meat inspection system. The audit was conducted from August 29 – September 24, 2003. Comments from Brazil have been included as an attachment to the final report. Enclosed is a copy of the final audit report.

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

Sincerely,

Sally Stratmoen JD

Sally Stratmoen
Director
International Equivalence Staff
Office of International Affairs

Enclosure

EQUAL OPPORTUNITY IN EMPLOYMENT AND SERVICES

cc: William Westman, Agricultural Counselor, U.S. Embassy, Brasilia
Colleen Magro, Trade Specialist, Embassy of Brazil, Washington, D.C.
Jeanne Bailey, FAS Area Officer
Amy Winton, State Department
Linda Swacina, Deputy Administrator, FSIS
Donald Smart, Director, Review Staff, PEER
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Sally Stratmoen, Director, IES, OIA
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Country File—Brazil-final to CVO Aug03

FINAL

APR - 1 2004

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

August 29 through September 24, 2003

Food Safety and Inspection Service
United States Department of Agriculture

TABLE OF CONTENTS

1. INTRODUCTION

2. OBJECTIVE OF THE AUDIT

3. PROTOCOL

4. LEGAL BASIS FOR THE AUDIT

5. SUMMARY OF PREVIOUS AUDITS

6. MAIN FINDINGS
   6.1 Government Oversight
   6.2 Headquarters Audit

7. ESTABLISHMENT AUDITS

8. LABORATORY AUDITS

9. SANITATION CONTROLS
   9.1 SSOP
   9.2 Sanitation

10. ANIMAL DISEASE CONTROLS

11. SLAUGHTER/PROCESSING CONTROLS
   11.1 Humane Handling and Slaughter
   11.2 HACCP Implementation
   11.3 Testing for Generic *Escherichia coli*
   11.4 Testing for *Listeria Monocytogenes*

12. RESIDUE CONTROLS

13. ENFORCEMENT CONTROLS
   13.1 Daily Inspection
   13.2 Testing for *Salmonella*
   13.3 Species Verification
   13.4 Monthly Reviews
   13.5 Inspection System Controls

14. CLOSING MEETING

15. ATTACHMENTS TO THE AUDIT REPORT

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority – Department of Inspection for Products of Animal Origin (DIPOA)
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
SSOP	Sanitation Standard Operating Procedures
E. coli	*Escherichia coli*
Salmonella	*Salmonella* species

1. INTRODUCTION

The audit took place in Brazil from August 29 through September 24, 2003.

An opening meeting was held on August 29, 2003, in Brasilia with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Brazil's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the Department of Inspection for Products of Animal Origin, and/or representatives from the regional and local inspection offices.

2. OBJECTIVE OF THE AUDIT

This 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, one regional inspection office, three government residue laboratories, two private microbiology laboratories performing analytical testing on United States-destined product, nine meat slaughter and processing establishments, and two cold storage facilities.

Competent Authority Visits			Comments
Competent Authority	Central	1	
	Regional	1	
	Local	11	Establishment level
Laboratories		5	
Meat Slaughter Establishments		4	
Meat Processing Establishments		5	
Cold Storage Facilities		2	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved on-site visits to 11 establishments: four slaughter establishments, five processing establishments and two cold storage facilities. The third part involved visits to three government residue laboratories and two private microbiology laboratories. Microbiology laboratories at Sao Jose dos Quatro Marcos/Mato Grosso and at Ituiutaba/Minas Gerais were conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella*. Residue laboratories in Pedro Leopoldo, Campinas and Porto Alegre were conducting analyses of field samples for Brazil's national residue control program.

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, (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs and a testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. Brazil's inspection system was assessed by evaluating these five risk areas.

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

At the opening meeting, the auditor explained 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, monthly supervisory visits to certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella*.

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 with the exception of the following equivalent measures:

1. Establishment employees collect samples.
2. Private laboratories analyze samples.
3. Plant is suspended the first time it fails to meet a *Salmonella* performance standard.

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 Pathogen Reduction/HACCP regulations.

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address: www.fsis.usda.gov/OPPDE/FAR/index.htm

The last two audits of Brazil's inspection system have shown some problems. Of the problems identified in the FSIS audit of January 2002, the following had been corrected by the audit in October/November 2002:

- Monthly review deficiencies were observed in seven establishments.
- Sanitation Standard Operating Procedures (SSOP) implementation deficiencies were observed in five establishments.
- SSOP corrective action deficiencies were observed in two establishments.
- SSOP record deficiencies were observed in three establishments.
- HACCP program monitoring deficiencies were observed in five establishments.
- HACCP program verification/validation deficiencies were observed in eight establishments.
- HACCP program corrective action deficiencies were observed in five establishments.
- HACCP record deficiencies were observed in five establishments.
- Grounds and pest control deficiencies were observed in four establishments.
- Insufficient light intensity was observed in two establishments.
- Construction/maintenance deficiencies were observed in four establishments.
- Sanitary operation deficiencies were observed in one establishment.

Of the problems identified in the FSIS audit of January 2002, the following had NOT been fully corrected by the audit in October/November 2002:

- Sanitation Standard Operating Procedures implementation deficiencies were observed in one establishment.

The following deficiencies were identified during the FSIS audit of October 2002:

- Written SSOP in nine establishments.
- SSOP document implementation in three establishments.
- SSOP signed/dated in one establishment.
- SSOP implementation, including monitoring in one establishment.
- HACCP contents in three establishments.

- HACCP records documenting implementation in four establishments.
- HACCP verification/validation in one establishment.
- Sanitary operations in five establishments.
- Construction/maintenance in one establishment
- Employee hygiene in one establishment.
- Grounds and pest control in three establishments.

6. MAIN FINDINGS

6.1 Government Oversight

The control of Brazil's meat inspection service is under the Minister of Agriculture and Supply with the Department of Inspection for Products of Animal Origin specifically supervising the slaughter and inspection of meat products. Regional offices provide oversight of inspection in the regions with supervisors providing guidance for inspection activities. These supervisors audit the activities of establishments outside their own areas of responsibility.

6.1.1 CCA Control Systems

DIPOA has the organizational structure and staffing to ensure uniform implementation of U.S. requirements, however, enforcement of FSIS requirements continues to be a problem.

6.1.2 Ultimate Control and Supervision

DIPOA has ultimate control and supervision over official activities of all employees and certified establishments.

6.1.3 Assignment of Competent, Qualified Inspectors

No deficiencies were found in this category. All assigned inspectors are generally paid by DIPOA although the following was learned during the exit meeting:

1. It is possible for the Brazilian Inspection Service to use the services of establishment-paid inspection personnel (auxiliaries) in the "extreme" situation. The "extreme" situation was defined as not having enough government inspectors. This is provided for in Brazilian law. The unacceptability of this practice for the U.S. exporting establishments has been previously pointed out to Brazilian inspection officials by FSIS officials.

2. Additionally, in the "extreme" situation, state employees (states like Sao Paulo, Rio de Janeiro, etc.) can be used for inspection purposes in slaughter or processing establishments that are exporting products to the U.S.

Under normal circumstances, there are sufficient numbers of inspectors assigned to U.S.-certified establishments. However, enforcement of FSIS requirements continues to be a problem.

6.1.4 Authority and Responsibility to Enforce the Laws

In over half of the establishments audited, DIPOA inspectors were not enforcing FSIS requirements.

6.1.5 Adequate Administrative and Technical Support

DIPOA has adequate administrative and technical support and the ability to support a third-party audit.

6.2 Headquarters Audit

The auditor conducted a review of inspection system documents at inspection offices in the audited establishments. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the United States.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

The following concern arose as a result the examination of these documents.

- No proper follow-up of corrective actions was found in one supervisory and one internal report in two establishments.

6.3.1 Audit of Regional and Local Inspection Sites

The Regional Office in Paranagua, state of Parana, was visited to discuss oversight and enforcement activities.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 11 establishments: four slaughter establishments, five processing establishments and two cold storage facilities. Two establishments were delisted by the Brazilian Inspection Service due to poor sanitary operations, ineffective implementation of SSOP and HACCP programs, and monthly supervisory reviews with reported deficiencies in many cases not properly corrected or not within the maintained time limit.

One establishment received a Notice of Intent to Delist from the Brazilian Inspection Service due to insufficient SSOP and HACCP implementation documentation.

This establishment may retain its certification for export to the United States provided that they correct all deficiencies noted during the audit within 30 days of the date the establishment was reviewed.

Specific deficiencies are noted in the attached individual establishment review forms.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

Three government residue-testing laboratories were audited: one in Pedro Leopoldo, one in Campinas, and one in Porto Alegre. Two private microbiology laboratories were audited: one in Quatro Marcos and one in Ituiutaba.

The microbiology laboratories testing for generic *E. coli* and *Salmonella* were using AOAC approved methods.

1. MPN of *E. coli* (LST – BGB broth – EC broth incubated 45°C).

2. Dry rehydratable film method – Petrifilm Plate Method / *E. Coli.*

Deficiencies noted in the three residue laboratories are discussed in Section 12 of this report.

9. SANITATION CONTROLS

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

9.1 SSOP

Based on the on-site audits of establishments, and except as noted below, Brazil's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, and good product handling and storage practices.

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 eight establishments audited were found to meet the basic FSIS regulatory requirements with no deficiencies. In the other three establishments, the following deficiencies were observed:

- Pre-operational deficiencies were observed in the boning area in one establishment. Pieces of fat and meat were found on the conveyor belt and skinning equipment. This area was released for operation after corrective action was completed by the cleaning crew.

- In one establishment, many cartons had been damaged by fork lifts, exposing product that was likely contaminated.

- A product re-inspection table was dusty. *This was a repeat finding.*

- In one establishment, the hindquarters of beef carcasses were contacting employees' platforms in the boning room.

- In one establishment, dripping condensate from overhead refrigeration units, rails, and ceilings that were not cleaned/sanitized daily, was falling onto beef carcasses in three coolers. This deficiency was not recorded in the daily sanitation report and was not described as a deficiency in the SSOP program. *This was a repeat deficiency.*

- Non-dripping condensation from the ceiling and at the entrance to the offal processing room was observed in the viscera cooler in one establishment.

- In the slaughter area in one establishment, an employee was observed contaminating a carcass by removing a hoof and not washing his hands before contacting the carcass with his contaminated hand.

- In one establishment, maxilla and mandibula separating equipment was contacting the wall and there was no sanitizing equipment in the room.

9.2 Sanitation

The following deficiencies were noted:

- In one establishment, a bucket used for edible product purposes was set directly on the floor in the beef extract area.

- In one establishment, the facility corridors were in total disarray, creating the potential for rodent harborage. *This was a repeat finding.*

- In two establishments, the doors to the outside were not sealed properly to prevent rodent or other pest entry. *This was a repeat finding.*

- In two establishments, extensive structural damage was noted throughout the facilities and many of the ceiling areas were wet due to roof damage.

- In one establishment, the chlorination system for the water used for cleanup of the dock and reinspection areas was broken.

- In one establishment, the employee dressing room was in complete disarray. Street clothes and personal items were stored with clean work clothes. Numerous insects and spiders were observed.

- Hand-washing equipment in the restroom was hand operated.

- "Snow" was falling and had fallen in the freezer. Not all cartons were covered or protected.

- The rodent/insect control program was not clearly described and the corrective actions taken were not sufficient in one establishment.

- Numerous flies were observed in the slaughter room in one establishment.

- Washing of dirty containers was observed to be deficient in the offal processing area in one establishment.

- Hand-operated waste receptacles were observed in the frozen meat receiving room, shipping room, and canned beef area in one establishment.

- No liquid soap was found at the hand washing area in the canned beef area in one establishment.

- Sanitizers were not maintained at the required temperature in the offal processing room and mincing room in two establishments. This deficiency was corrected by the establishment management in one establishment. *This was a repeat deficiency.*

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

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, humane handling and humane slaughter, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: 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 and implementation of a generic *E. coli* testing program in slaughter establishments. The following deficiencies were noted:

- There was a low light level at the product re-inspection table in two establishments. *This was a repeat finding.*

- Carcass brands were not legible on approximately 40% of the carcasses at one establishment.

- In one establishment, there was no specific designated area for U.S.-destined export product in the freezer. Whatever space was available at the time of export was used.

11.1 Humane Handling and Slaughter

The following deficiency was noted:

- Drinking water for animals was missing in the suspect pen in one establishment.

11.2 HACCP Implementation.

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of the nine establishments where they were required. In five establishments, the HACCP requirements were effectively implemented.

In the other four establishments, the following HACCP implementation deficiencies were observed.

- On-site HACCP verification was not properly performed at a sufficient frequency.
- Verification frequencies were not identified.
- The pre-shipment review did not reflect the current situation at the establishment. The CCPs have changed but the old CCP list was used for the pre-shipment review.
- The HACCP program included the same CCP for intestinal/ingesta contamination and temperature deviation.

11.3 Testing for Generic *E. coli*

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

Four of the 11 establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in two of the four slaughter establishments.

- Generic *E. coli* testing was deficient in two slaughter establishments. These establishments were analyzing results using the table for the excision method while performing the sponging testing method.

11.4 Testing for *Listeria monocytogenes*

None of establishments audited were producing ready-to-eat products for export to the United States. Therefore, the HACCP plans in these establishments did not have to be reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to occur.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

Three government residue testing laboratories were audited: one in Pedro Leopoldo, one in Campinas, and one in Porto Alegre.

Brazil was not following their 2003 residue plan and the following deficiencies were noted:

- Nitrofurazon was not being analyzed.
- Ivermectine was not being analyzed.
- Chloramphenicol was not being analyzed.
- Sulfonamide samples have not been collected for 6 months.
- Maintenance records are not kept for sample holding temperatures.
- Recordkeeping in the Porto Alegre laboratory in respect to trace back to standards for trace elements was incomplete
- The FSIS method and tissue for Diethylstilbestrol (DES) analysis were not being used.
- The appropriate method for antibiotic testing was not being used.

13. ENFORCEMENT CONTROLS

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

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments.

13.2 Testing for *Salmonella*

Brazil has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measures:

- Establishment employees collect *Salmonella* samples.

- Samples are analyzed in private laboratories.

- Brazil suspends an establishment the first time it fails to meet a *Salmonella* performance standard.

Four of the 11 establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* was properly conducted in all four establishments.

13.3 Species Verification

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

13.4 Monthly Reviews

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

13.5 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between establishments; and prevention of commingling of product intended for export to the United States with product intended for the domestic market.

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

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

14. CLOSING MEETING

A closing meeting was held on September 24, 2003 in Brasilia 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.

Dr. Oto Urban
International Audit Staff Officer

15. ATTACHMENTS

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

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
9/16/03	Quatro Marcos Ltda, private laboratory

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
DIPOA	Quatro Marcos Sao Jose dos Quatro Marcos, Matto Grosso Brazil	Quatro Marcos Sao Jose dos Quatro Marcos,

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. Oto Urban	Dr. Carlos Eduardo Tedesco da Silva

	Residue Code/Name ▶			Sal	Eco
	REVIEW ITEMS	ITEM #			
SAMPLING PROCEDURES	Sample Handling	01	EVALUATION CODE	A	A
	Sampling Frequency	02		A	A
	Timely Analyses	03		A	A
	Compositing Procedure	04		O	O
	Interpret Comp Data	05		O	O
	Data Reporting	06		A	A
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A
	Correct Tissue(s)	08		A	A
	Equipment Operation	09		O	O
	Instrument Printouts	10		O	O
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	O	O
	Recovery Frequency	12		O	O
	Percent Recovery	13		O	O
	Check Sample Frequency	14		A	A
	All analyst w/Check Samples	15		A	A
	Corrective Actions	16		A	A
	International Check Samples	17		A	A
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE	A	A
OTHER REVIEW		19	EVAL. CODE		
		20			

SIGNATURE OF REVIEWER: (for Oto Urban DVM)

DATE: 10/16/03

U.S. FORM 9530-4 (4/92)

FOREIGN COUNTRY LABORATORY REVIEW (Comment Sheet)	REVIEW DATE	NAME OF FOREIGN LABORATORY
	9/16/03	Quatro Marcos Ltda, private laboratory

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
DIPOA	Quatro Marcos Sao Jose dos Quatro Marcos, Matto Grosso Brazil	Quatro Marcos Sao Jose dos Quatro Marcos,

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. Oto Urban	Dr. Carlos Eduardo Tedesco da Silva

RESIDUE	ITEM NO.	COMMENTS
		No comments.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	9/18/03
NAME OF FOREIGN LABORATORY	Bertin Ltda, private laboratory
FOREIGN GOV'T AGENCY	DIPOA
CITY & COUNTRY	Ituiutaba, Minas Gerais Brazil
ADDRESS OF LABORATORY	Ituiutaba, Minas Gerais
NAME OF REVIEWER	Dr. Oto Urban
NAME OF FOREIGN OFFICIAL	Dr. Carlos Eduardo Tedesco da Silva

	Residue Code/Name ▶			Sal	Eco
	REVIEW ITEMS	ITEM #			
SAMPLING PROCEDURES	Sample Handling	01	EVALUATION CODE	A	A
	Sampling Frequency	02		A	A
	Timely Analyses	03		A	A
	Compositing Procedure	04		O	O
	Interpret Comp Data	05		O	O
	Data Reporting	06		A	A
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A
	Correct Tissue(s)	08		A	A
	Equipment Operation	09		O	O
	Instrument Printouts	10		O	O
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	O	O
	Recovery Frequency	12		O	O
	Percent Recovery	13		O	O
	Check Sample Frequency	14		A	A
	All analyst w/Check Samples	15		A	A
	Corrective Actions	16		A	A
	International Check Samples	17		A	A
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE	A	A
OTHER REVIEW		19	EVAL. CODE		
		20			

SIGNATURE OF REVIEWER: (for Oto Urban DVM) DATE: 10/16/03

Designed on FormFlow Software

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE 9/18/03	NAME OF FOREIGN LABORATORY Bertin Ltda, private laboratory
FOREIGN GOV'T AGENCY DIPOA	CITY & COUNTRY Ituiutaba, Minas Gerais Brazil	ADDRESS OF LABORATORY Ituiutaba, Minas Gerais
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Dr. Carlos Eduardo Tedesco da Silva	

RESIDUE	ITEM NO.	COMMENTS
		No comments.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE: Sept 1, 2 & 3	NAME OF FOREIGN LABORATORY: LARA CAMPINAS	
FOREIGN GOV'T AGENCY: LARA GOVERNMENT OF BRASIL	CITY & COUNTRY: CAMPINAS, S.P BRAZIL	ADDRESS OF LABORATORY: CAMPINAS, S.P.
NAME OF REVIEWER: DR. B. P. DEY	NAME OF FOREIGN OFFICIAL: DR. JOSE GUEDES DEAK DIRECTOR	

	Residue Code/Name ▶		200	*400	500**
	REVIEW ITEMS	ITEM #	EVALUATION CODE		
SAMPLING PROCEDURES	Sample Handling	01	A	A	↑
	Sampling Frequency	02	A	A	
	Timely Analyses	03	A	A	
	Compositing Procedure	04	N/A	N/A	
	Interpret Comp Data	05	N/A	N/A	
	Data Reporting	06	A	A	
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	
	Correct Tissue(s)	08	A	A	
	Equipment Operation	09	A	A	
	Instrument Printouts	10	A	A	
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	
	Recovery Frequency	12	A	A	
	Percent Recovery	13	A	A	
	Check Sample Frequency	14	A	A	↑
	All analyst w/Check Samples	15	A	A	
	Corrective Actions	16	A	A	
	International Check Samples	17	N/A	N/A	
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE		
OTHER REVIEW		19	EVAL. CODE		
		20			

USED AS MATRIX FOR ANALYSIS

URINE IS BEING

SIGNATURE OF REVIEWER: DATE:

FSIS FORM 9820-4 (10/90) PRINTED ON FormFlow Software

* 400 Pb & Cd is only. FOR Air samples are being to Porto Alegre.

** 500 Analytical method for urine analysis Estimated.

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL

RESIDUE	ITEM NO.	COMMENTS

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE: 9/10-9/12

NAME OF FOREIGN LABORATORY: LARA, PORTO ALEGRE

FOREIGN GOVT AGENCY: LARA GOVERNMENT OF BRASIL

CITY & COUNTRY: PORTO ALEGRE BRASIL

ADDRESS OF LABORATORY: LARA, PORTO ALEGRE

NAME OF REVIEWER: DR. B. P. DEY

NAME OF FOREIGN OFFICIAL: DR. CARLOS RAFAEL SFOGGIA - DIRECTOR
DR. JOAO-VIANNE FREITAS - ASST. DIRECTOR

	Residue Code/Name ▶			200*	203	203	800	900	400
	REVIEW ITEMS	ITEM #							
SAMPLING PROCEDURES	Sample Handling	01	EVALUATION CODE	A	↑	↑	↑	↑	A
	Sampling Frequency	02		A					A
	Timely Analyses	03		A					A
	Compositing Procedure	04		N/A					N/A
	Interpret Comp Data	05		N/A					N/A
	Data Reporting	06		A					A
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	CHLORAMPHENICOL (ELISA)	CHLORAMPHENICOL (HPLC/UV)	NO SAMPLE FOR 6 MONTHS	METABOLITE OF NITROFURANS ARE ANALYZED IN CAMPINAS	A
	Correct Tissue(s)	08		A					A
	Equipment Operation	09		A					A
	Instrument Printouts	10		N/A					A
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	A	NOT DONE			NOT DONE	A
	Recovery Frequency	12		A					A
	Percent Recovery	13		A					A
	Check Sample Frequency	14		A					A
	All analyst w/Check Samples	15		A					A
	Corrective Actions	16		A					A
	International Check Samples	17		N/A					N/A
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE						
OTHER REVIEW		19	EVAL. CODE						
		20							

SIGNATURE OF REVIEWER: DATE:

FSIS FORM 8620-4 (8/88) — Designed on FormFlow Software

*200 (ANTIBIOTICS) Only performing STOP TEST

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE	NAME OF FOREIGN LABORATORY	
FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	

REBIQUE	ITEM NO.	COMMENTS
ALL	1.	No maintenance record is kept on sample holding refrigerator in the sample receiving area.
200	2	The screen test is not sensitive enough to detect antibiotic residue in beef tissue
400	3	Trace back record for standards is not ~~documented~~ well recorded on reagents prepared from standards
800	4	Centrifuge not functioning properly.

OPM 9520-4 (9/95)

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE: Sept 3, 4, 5 and 8, 9

NAME OF FOREIGN LABORATORY: LARA PEDRO LEOPOLDO, MR

FOREIGN GOV'T AGENCY: LARA GOVERNMENT OF BRAZIL

CITY & COUNTRY: PEDRO LEOPOLDO MR

ADDRESS OF LABORATORY: LARA, PEDRO LEOPOLDO MR

NAME OF REVIEWER: DR. B. P. DEY

NAME OF FOREIGN OFFICIAL: DR. TOMAZ de AQUINO PORFIRTO, DIRECTOR

	Residue Code/Name			200	400	800 *	[redacted]	500	900	941
	REVIEW ITEMS	ITEM #								
SAMPLING PROCEDURES	Sample Handling	01	EVALUATION CODE	A	↑	A	[redacted]	↑	↑	↑
	Sampling Frequency	02		A	SAMPLE DIVERTED TO PORTO ALEGRE LAB.	A				
	Timely Analyses	03		A		A				
	Compositing Procedure	04		N/A		N/A		AS MATRIX	NITROFURAN COMPOUNDS	
	Interpret Comp Data	05		N/A		N/A				
	Data Reporting	06		A		A				
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A	A		URINE BEING USED FOR ANALYSIS	METABOLITES OF NITROFURAN BEING ANALYZED IN VERMICELLI	NOT BEING ANALYZED
	Correct Tissue(s)	08		A	A	A				
	Equipment Operation	09		A	A	A				
	Instrument Printouts	10		N/A	A	A				
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	A	A	A				
	Recovery Frequency	12		N/A	A	A				
	Percent Recovery	13		N/A	A	A				
	Check Sample Frequency	14		A	A	A				
	All analyst w/Check Samples	15		A	A	A				
	Corrective Actions	16		A	A	A				
	International Check Samples	17		N/A	N/A	N/A	N/A			
REVIEW	Corrected Prior Deficiencies	18	EVAL. CODE							
OTHER REVIEW		19	EVAL. CODE							
		20								

SIGNATURE OF REVIEWER: DATE:

* 400 Sample being diverted to Porto Alegre

* 800: Performs confirmatory analysis only.

FSIS FORM 9530-4 (12/88) PRINTED BY FormFlow Software

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE	NAME OF FOREIGN LABORATORY

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL

RESIDUE	ITEM NO.	COMMENTS
ALL	1	No maintenance record is kept on sample holding refrigerator in the sample receiving area.
200	2.	Using a non-sensitive screen test for bovine tissue.
500	3	Using urine as analytical matrix which is different than FSIS
400	4	Atomic absorption unit is not functioning. All samples are diverted to Porto Alegre Laboratory.
900	5	Analyzed for Metabolites of Nitrofurans by Campinas Lab.
941	6	No analysis for Ivermectin is being carried out.

FSIS FORM 9520-4 (9/95)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Ferreira International LTDA Av. Zoello Sola Tres Rios-Rio de Janeiro	09 - 05 - 03	SIF-13	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

BRAZIL – Est. 13. – 9/5/03

46 The water temperature in the boning room sanitizer was bellow required level (79C). This was corrected immediately by the establishment officials.

46 Plastic covering for edible product was contacting the floor in the cooler. This deficiency was corrected immediately by the establishment employee.

61. NAME OF AUDITOR

Dr. Otto Urban

62. AUDITOR SIGNATURE AND DATE

10/16/03 (for Otto Urban DVM)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
B.F. Productos Alimenticias LTDA. Av. Central s/n – Frigorifico BARRETOS-Sao Paulo	09-01-2003	SIF 76	BRAZIL
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
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17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	X
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

BRAZIL – Est. SIF 76 9-1-03

46 A bucket used for edible product purpose was set directly on the floor in the beef extract area. This deficiency was immediately corrected by the establishment management.

51/53 Carcass stamps were not clear in about 40% of cases. This deficiency was discussed with the inspection service and proper corrective action is going to be taken.

61. NAME OF AUDITOR

Dr. Otto Urban

62. AUDITOR SIGNATURE AND DATE

10/16/03 (for Otto Urban DVM)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
BE-Comercio e Industria, Importacao e Exportacao Ltd. Hulha Negra, Rio Grande do Sul	09 – 09 - 03	STF-226	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
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Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
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19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	
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24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

BRAZIL – Est. 226 9-9-03

19 On-site HACCP verification was not properly performed with not sufficient frequency level. This was corrected by the establishment management.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

10/16/03 (for Oto Urban DVM)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Bertin LTDA Parque Industrial de Lins LINS-Sao Paulo	09 - 02 - 03	337	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
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Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
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23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

BRAZIL - Est. 337 09-02-03

10. Pre-operational deficiencies were observed in the boning area. Pieces of fat and meat were found on the conveyor belt, and skinner equipment. This area was released for operation after corrective action was completed by the cleaning crew.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

10/16/03 (for Dr. Urban DVM)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Kerry do Brasil Ltda, Rua Cristiano Alves da Silva 15, Tres Corasoes, M.G.	09 - 24 - 03	SIF-471	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
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Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
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Part C - Economic / Wholesomeness	
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24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	O
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

BRAZIL - Est. SIF-471 09-22-03

No comments.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

10/16/03 (for Dr. Urban DVM)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Bertin Ltda, Vila Miisa s/n Ituiutaba, M.G.	09 – 18 - 03	SIF-504	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
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9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
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12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
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19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	O
24. Labeling - Net Weights	O
25. General Labeling	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	X
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

BRAZIL – Est. 504 9-18-03

54 Drinking water for animals was missing in the suspect pen. This deficiency was scheduled for the next day correction by the establishment officials.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

10/16/03 (for Oto Urban DVM)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
BF- Productos Alimentarios LTDA Tres Rios-Rio de Janeiro	09 – 05 - 03	SIF-036	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan.	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

BRAZIL – Est. 2427 9-5-03

* This establishment sporadically exports product to the U.S. At the time of this audit, there was no production performed for the U.S. market.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

10/16/03 (for Oto Urban DVM)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Sadia S/A Av. Governador Manoel Ribas Paranagua-Parana	09 – 03- 03	SIF-785	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have faled to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	O
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O
16. Records documenting implementation and monitoring of the HACCP plan.	O
17. The HACCP plan is signed and dated by the responsible establishment individual.	O
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	O
19. Verification and validation of HACCP plan.	O
20. Corrective action written in HACCP plan.	O
21. Reassessed adequacy of the HACCP plan.	O
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	X
39. Establishment Construction/Maintenance	X
40. Light	X
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	X
44. Dressing Rooms/Lavatories	X
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	X
59.	

60. Observation of the Establishment

BRAZIL – Est. 785 9-3-03

10.Many cartons had been damaged by fork lifts (exposed product that was likely contaminated). No corrective action was taken either by the establishment or the inspection service.
10.Product re-inspection table dusty (repeat finding). No corrective action was taken either the establishment or the inspection service.
38. Corridors in facility were in total disarray, creating good opportunity for rodent harborage (repeat finding).
38Doors to the outside were not sealed properly to prevent rodent or other pest entry (repeat finding).
39. Extensive structural damage noted throughout facility, many of the ceiling areas were wet due to roof damage.
40Low light level at product re-inspection table (repeat finding).
43.The chlorination system was broken (water used for cleanup of dock and reinspection areas). No immediate corrective action was taken by the establishment management.
44.Dressing room was in complete disarray. Street clothes and personal items were stored with clean work clothes. Numerous insects and spiders observed. No immediate corrective action was taken either by the establishment of the inspection service.
44. Hand-washing equipment in the restroom was hand operated.
46. Snow" was falling/had fallen in the freezer. Not all cartons were covered/protected. No corrective action was taken either by the establishment or the inspection service.
51.Inspection service documented problems but there was no effective corrective actions taken.
58. This establishment was delisted by the Brazilian Inspection Service.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

10/16/03 (for Oto Urban DVM)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Frigorifico Extremo do Sul Capao do Liao, Rio Grande do Sul	09 - 10 - 03	SOF-1651	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	O
24. Labeling - Net Weights	O
25. General Labeling	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	X
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	X
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	X
59.	

60. Observation of the Establishment

BRAZIL – Est.1651 9-10-03

19/51 Verification frequencies were not identified. This deficiency was scheduled for correction by the establishment management.

22/51 The pre-shipment review did not reflect the current situation at the establishment. The CCPs have changed but the old CCPs list was used for the pre-shipment review. This was corrected immediately by the establishment management

27/51 The written procedure indicates that sponging method is used for *E. coli* testing but excision criteria is used for calculating the result of the test.

38/39 The structural problems (holes under doors) were observed in the shipping area. This was scheduled for correction. The establishment rodent control program indicates presence of rodents to a varying degree at different times.

58 Notice of Intend to Delist was issued to this establishment because of SSOP and HACCP documentation deficiencies,

61. NAME OF AUDITOR

Dr. Otto Urban

62. AUDITOR SIGNATURE AND DATE

10/16/03 (for Otto Urban DVM)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Brafrigo S/A Itajai, Santa Catarina	09 – 04 - 03	SIF-2427	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	O
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O
16. Records documenting implementation and monitoring of the HACCP plan.	O
17. The HACCP plan is signed and dated by the responsible establishment individual.	O
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	O
19. Verification and validation of HACCP plan.	O
20. Corrective action written in HACCP plan.	O
21. Reassessed adequacy of the HACCP plan.	O
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60 Observation of the Establishment

BRAZIL – Est. 2427 8-4-03

39 There was a space under the door connecting the mechanical room with the loading dock. This is going to be sealed by the establishment to prevent the entrance of rodents to the loading dock.

61. NAME OF AUDITOR

Dr. Ote Urban

62. AUDITOR SIGNATURE AND DATE

10/16/03 (for Ote Urban DVM)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Quatro Marcos Ltda, Sao Jose dos Quatro Marcos, M.S.	09 – 16 - 03	SIF-3031	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	X
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	X
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	X
37. Import	
38. Establishment Grounds and Pest Control	X
39. Establishment Construction/Maintenance	X
40. Light	X
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	X
58.	X
59.	

80. Observation of the Establishment

BRAZIL – Est. 3031 9-16-03

10 Hindquarter of beef carcasses were contacting employees' platform in the boning room. The establishment officials scheduled this deficiency for later corrective action.

10/12/13 Dripping condensate, from overhead refrigeration units, rails, and ceilings that was not cleaned/sanitized daily, was falling onto beef carcasses in three coolers. This deficiency was not immediately corrected either by the establishment officials or the inspection service officials. This deficiency was not recorded in the daily sanitation report neither was described as a deficiency in the SSOP program (repeated deficiency).

10 Non-dripping condensation from ceiling and at the entrance to the offal processing room was observed in the viscera cooler. The corrective action consisted from removing product from the direct condensation area.

10 The carcass contamination was observed by the employee removing hoof, not washing his hands and contacting carcass with his contaminated hand in the slaughter house. This deficiency was not corrected by the establishment officials.

10 Maxilla and mandibula separating equipment was contacting the wall and did not have any sanitizing equipment in the room. No corrective action was scheduled.

18 The HACCP program included the same CCP for intestinal/ingesta contamination and temperature deviation. This deficiency was scheduled for correction by the establishment officials.

27 The generic *E. coli* testing is performed by the sponging method but excision criteria table is used for evaluation of data (results). This deficiency was discussed with the establishment and government officials.

36 There was no designated area for U.S. destined export product in the freezer. The available space at the time of export is used. Corrective action was promised by the inspection officials.

38/39 Gaps observed at the bottoms and sides of doors in the shipping room, and frozen meat receiving room (repeated deficiency). The establishment officials and the inspection officials promised corrective action.

38 Rodent/Insect program was not clearly described and the corrective action taken was not sufficient. The establishment officials promised to correct this deficiency.

38 Numerous flies were observed in the slaughter room. Neither establishment nor GOG inspection officials took corrective action (repeated deficiency).

39 Inadequate light was observed at the frozen product receiving re-inspection table. The inspection official promised prompt corrective action (repeated deficiency, different inspection area).

45 Washing of dirty containers was observed to be deficient in the offal processing area. This deficiency was immediately corrected by the inspection official.

46 Hand-operated waste receptacles were observed in the frozen meat receiving room, shipping room, and canned beef area. No corrective action was taken or scheduled either by the establishment officials of the inspection personnel.

46 No liquid soap was found at the hand washing area in the canned beef area. No immediate corrective action was observed by the establishment management.

47 The sanitizer was not maintained at the required temperature in the offal processing room (78C). This deficiency was corrected by the establishment management (repeated deficiency).

51 Inspection service documented problems but there was no effective corrective actions taken.

57 Monthly supervisory reviews reported many different deficiencies but in many cases there is either not the proper corrective action taken or the time limit is not maintain.

58 This establishment was delisted by the Brazilian inspection service because of the repeated deficiencies and lack of corrective action taken.

81. NAME OF AUDITOR

Dr. Oto Urban

82. AUDITOR SIGNATURE AND DATE

10/16/03

FEDERAL PUBLIC SERVICE
MINISTRY OF AGRICULTURE, CATTLE RAISING AND SUPPLY – MAPA
BUREAU OF AGRICULTURE AND CATTLE RAISING SAFETY - SDA
DEPARTMENT OF INSPECTION OF PRODUCTS OF ANIMAL ORIGIN – DIPOA
INTERNATIONAL COMMERCE CONTROL DIVISION – DCI

Doc. 281/2004/DCI/DIPOA Brasília, 03/12/2004

FROM: Director, International Commerce Control Division-DCI of the Department of Inspection of Products of Animal Origin-DIPOA

TO: Mr. William W. Westman – MD Counselor for Agriculture Affairs, U.S. Embassy in Brazil/Brasília – Fax 312-7659

Subject: Information regarding Corrective Measures implemented by the brasilian establishments visited by FSIS Inspector, Dr. Oto Urban, between 8/29/2003 and 10/24/2003.

Attached please find those corrective measures implemented by the brasilian establishments visited by FSIS Inspector, Dr. Oto Urban, between 8/29/2003 and 10/24/2003, , in response to the Report submitted by FSIS to this Department.

Sincerely,

MARCELO VIEIRA MAZZINI
(illegible)

Agreed :
03/12/04
José Augusto E. Peixoto
Federal Inspector
Veterinary Doctor
DIPOA Sub-Director

FIS 13		
Non-Compliance	Corrective Measures	When
SANITARY OPERATIONS		
Water temperature in the room sterilizer was below required levels (illegible)	Situation was immediately corrected by installing electrical resistance to increase and maintain the temperature at (illegible)	Immediately
Plastic packaging of food products were touching the freezer floor	Immediately corrected, by new personnel training in Good Production Practices and Operational Procedures	Immediately

FIS 76		
Non-compliance	Corrective Measures	When
SANITATION		
One tray used for food products was placed directly on the floor of the room for meat extraction	Those employees directly envolved in this infraction were informed of this occurrence including supervisors. Further training took place of all those parties envolved in this process, with special focus on the risks of product contamination.	Immediately
INSPECTION Carcass stampls were illegible in approximately 40% of the cases. This deficiency was discussed with the inspection service.	FIS promoted identification of those establishments responsible for raw-materials, filling out the Record of Meat Reception from third parties with all raw-materials identification, communicating with administration for ensuring adequate procedures are followed	Immediately

FIS 226		
Non-Compliance	Corrective Measures	When
HAPPC		
On-site HAPPC verification was not being adequately performed, and not frequentely enough	Daily verification is being done by a quality control employee trained in HAPPC. Items such as (illegible) and schedule were included. As suggested by the inspector, weekly verification was taken out.	Immediately

FIS 337		
Non-compliance	Corrective Measures	When
Export requirements		
Pre-operational deficiencies were observed in the boning room. Pieces of fat and meat were found in the transport tray and skinner. This area was released for operation after corrective measures were implemented by the sanitation team.	Non-compliances were immediately corrected and as a preventative measure new training of the personnel responsible for sanitation activities. Competencies for HAPPC activities were redirected for sector supervisors (verification was previously attributed to the sanitation service supervisor). Quality control employees were retrained with special enfasis on the verification of all equipment, mainly record preparation. In addition, federal inspection promoted agent recycling and inspected all equipment and facilities during the next thirty days, independently from performing IUs' lottery. Presently each IU are verified at least once a month.	Immediately

FIS 504		
Non-compliance	Corrective Measure	When
Ante-mortem inspection:		
Water tub in observation pen was empty. Correction of this deficiency was programmed for the following day by company employees.	Build stone drinking tub	Immediately

FIS 785		
Non-compliance	Corrective Measure	When
HOPP:		
Many cardboard boxes were damaged by stocking equipment (exposed product subject to possible contamination). Corrective action had not been taken either by the establishment or by the inspection service.	Products were segregated and transported to an adequate location. The quality control department performs inspection every 2 hours to remove any product that is damaged during transport.	Immediately
Dusty reinspection tables (recurrence). Corrective action had not been taken either by the establishment or by the inspection service	Cleaning was performed and employee was designated to perform this task. Further training took place to ensure proper compliance with HOPP requirements. PVC curtains were also installed in the acess doors to block out dirt.	Immediately
ESTABLISHMENT:		
Establishment hallways totally unorganized, presenting ideal conditions for rodent habitat (recurrence).	Hallways were cleaned and organized, structure was reformed and access doors were shut. Hallway access control was implemented, (illegible) was removed, mosaic was placed on the walls and cleaning team was assigned hallway duty.	4/10/2004
Outdoor access doors inadequately sealed to avoid rodent access or other pests (recurrence)	It was determined to close and seal these doors as an internal procedure. Access structure was reformed and doors replaced. Implement preventive and corrective measures as stated in HPPO	3/30/2004
Extensive structural damage to the establishment. Large ceiling area wet due to such damage.	Individual was assigned to correct this deficiency, i.e., repair, clean and (illegible) this area. The entire ceiling was replaced. New ceiling built with more adequate moist resistant materials. Implement preventive and corrective measures as stated in HPPO	Immediately
Poor lighting of reinspection table (recurrence)	Replacement with better lighting. Daily lighting inspection.	Immediately
Chlorination system of water destined for cleaning reinspection areas was broken. Corrective measures had not been implemented by the establishment.	Water chlorination system repair was immediately ordered. Daily local inspection. Use alternative system for adequate water storage.	4/30/2004
Changing rooms were totally unorganized. Clothes and personnal items were stored together with clean uniforms. Presence of numerous spiders and insects. Corrective measures had not been implemented by the establishment or inspection service.	Cleaning and organizing changing rooms. Talk with personnel about hte need for cleanliness and organization. Weekly inspection plan implementation. Paint and remodel area.	Immediately
Manual flush commode	Install mechanical flush commode. Compliance with MAPA	Immediately
Snow observed in freezer tunnel. Not all bozes were covered and/or protected. Corrective measures had not been implemented by the establishment or inspection service.	Immediate cleaning of of chambers and head proteection with plastic. Clean snow.	4/30/2004
INSPECTION:		
Inspection service recorded problems, but did not take corrective measures.		Immediately

FIS 1651		
Non-Compliance	Corrective Measures	When
CCPPA/Inspection		
Inspection frequency was not specified. This deficiency was programmed for correction by company management	Inspection frequency were identified during CCPPA review on 09/15/2003	Immediately
Pre-shipment review did not reflect the reality in the establishment. CCPs were changed but the old CCPs list was in use during pre-shipment review. This deficiency was immediately corrected by company management	Pre-shipment inspection records was performed with respective CCPs on 9/15/2003	Immediately
ESTABLISHMENT		
Structural problems were identified (holes over doors) in shipping area. Corrective measures were programmed.	Structural problems (holes over doors) were immediately corrected.	Immediately
Rodent control program shows rodent presence at dirrefent times in different stages	Rodent program was reviewed together with rodent control company contracted. It was decided to remove garbage disposal that was too close to women's changing room (place where rodent presence was found). Responsible employee was also instructed to (illegible) in case of (illegible).	Immediately
E. Coli TESTING:		
Written procedure indicates Swab was the method used to evaluate the presence of *E. coli.*, but the table of destructive methos was used to evaluate test results.	For new E. coli testing 241 previous samples were tested, resulting in safety limit of 2 CPU/cm2 and critical limit of 4 CPU/cm2	Immediately

FIS 2427		
Non-Compliance	Corrective Measures	When
ESTABLISHMENT		
There was a space underneath the door that connects the mechanical room to the shipping area that must be closed by the establishment to block out rodents.	Closing of space underneath door that connects mechanical room with shipping area. Door was replaced with automatic action door.	Immediately

FIS 3031		
Non-Compliance	Corrective Measures	When
HPPO:		
Carcass rump was in contact with platforms in boning room. Company personnel recorded this deficiency for further corrective action	Adjust platforms with added protection to avoid touching meat	Immediately
Condensation with dripping over refrigeration units, tracks and ceiling that were not cleaned daily. Dripping over carcasses in three freezers. Corrective measures had not been implemented by the establishment or inspection	Operational oversight correction that was identified was causing the deficiency	Immediately

ANSWERS TO THE U.S.A. MISSION
QUESTIONNAIRE ABOUT RESIDUES

ITEM 12 – RESIDUE CONTROL AND HAND-WRITTEN COMMENTS AT THE END OF THE REPORT.

Brazil was not following their 2003 residue plan and the following deficiencies were noted: Lara/RS; Lara/SP and Lara/MG.

- **Nitrofurazon was not being analyzed.**

Lara/Campinas acquired the LC-MS equipment which was installed in June of 2003, with subsequent performance of acceptance tests. In September there was an operations training program, the validation process will be finalized in April 2004 and, beginning in May 2004, Laboratories will be accredited for this purpose. During this time interval, tests will be performed by Laboratories authorized by DIPOA. Additionally, we inform that CLA is making LC-MS equipment available for LARA/RS.

DIPOA/MAPA has been performing constant monitoring of the metabolites in this drug in poultry meat and industrialized eggs since February 2003. More than 20,000 samples have already been done in laboratories authorized by DIPOA and no indications of the indiscriminate use of this drug were found.

PNCR 2004 foresees testing in swine (60 samples), poultry (932 samples) and equines (60 samples), besides the inclusion, beginning in May 2004, of 60 samples for bovines to be tested in accredited or authorized laboratories.

- **Ivermectine was not being analyzed.**

At LARA/MG, 63 samples were performed from November through December of 2003. Additionally, PNC 2004 foresees 245 samples for bovines.

- **Chloramphenicol was not being analyzed.**

PNCR 2004 foresees 60 samples for each species (bovines, swine, poultry and equines).

- **Sulfonamide samples have not been collected for 6 months.**

The samples were not collected during a period of 6 months due to the fact that the samples foreseen in PNCR 2003 were drawn during the 1st semester of 2003. The PNCR 2004 foresees 374 samples for bovines, 342 for swine, 156 for poultry and 60 for equines. In this context, the samples will undergo drawing distributed throughout the whole year, thus avoiding random distribution concentrated in 6 months.

- **Maintenance records are not kept for sample holding temperatures**

This non-conformity event was corrected and thermometers were made available for recording maximum and minimum temperatures in refrigerators and freezers.

- **Recordkeeping in the Porto Alegre laboratory in respect to trace back to standards for trace elements was incomplete.**

This non-conformity event detected in Lara/RS was corrected, as can be seen in standard operational procedure POP – code SFQ/PQL/ 005/001/04.

- **The FSIS method and tissue for Diethylsilbestrol (DES) analysis were not being used.**

As far as the DES testing, we are not using the FSIS method where the matrix is liver. Detection is done by mass spectrometry coupled with the gas chromatographic (CG-EM), however the monitoring using liver is being performed at the Laboratory accredited for the radioimmunoassay technique (RIA) and suspected results confirmed by CG-EM at Lara/SP.

We consider the methodology being used to be equivalent to the methodology proposed by FSIS.

- **The appropriate method for antibiotic testing was not being used.**

The method used is FSIS, USDA, Microbiology Laboratory Guidebook Section 6316, 1974 recommended by Codex Alimentarius, which has the sensitivity required by the LMRs adopted in Brazil.

However, the auditor remarked that there is a more sensitive triage method in the market, which is available for sale in the United States. Said method uses another microorganism, different from the one used in Brazil. We are now reviewing operations to prepare for the use of this methodology at LARAs/MG and RS.

FINAL COMMENT AT THE END OF THE REPORT ITEM NR. 04

- **Centrifuge not functioning perfectly.**

As far as the comment about the centrifuge, we inform that we have already requested the replacement Lara/RS.

Arsenic Testing

The spectrophotometer equipment for atomic absorption where arsenic testing is performed presented problems, however the tests were performed in another Laboratory of the same chain. Corrective action was taken and, after servicing of the equipment, all tests were normalized at Lara/SP.

- **Atomic absorption is not functioning. The samples are diverted to Porto Alegre Laboratory.**

The spectrophotometry equipment for atomic absorption was not working during the auditing period due to problems with part replacements, since said equipment was purchased 10 years ago.