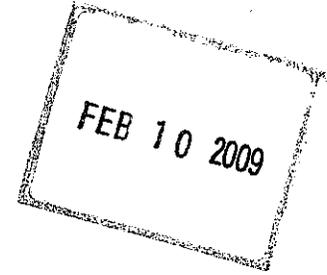




United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250



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

Dear Dr. Oliveira da Costa:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Brazil's meat inspection system June 11 through July 22, 2008. Comments to the draft final report from Brazil have been included as an attachment to the final report. Enclosed is a copy of the final audit report. We apologize for the delay in the submission of this report

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 205-3873, by facsimile at (202) 720-0676, or electronic mail at [manzoor.chaudry@fsis.usda.gov](mailto:manzoor.chaudry@fsis.usda.gov).

Sincerely,

*by Don Carlson, acting Director*

For Manzoor Chaudry  
Deputy Director  
International Audit Staff  
Office of International Affairs

Enclosure

U. S. DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
OFFICE OF INTERNATIONAL AFFAIRS  
INTERNATIONAL AUDIT STAFF  
WASHINGTON, DC  
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FEB 10 2009

**MEMORANDUM**

TO: Alan Hrapsky, Counselor  
US Embassy, Brasilia  
Avenida Das Nacoes, Lote No. 3  
70403-900 Brasilia, DF Brazil

FROM: Manzoor Chaudry  
Deputy Director  
International Audit Staff, OIA, FSIS, USDA

SUBJECT: FSIS FINAL AUDIT REPORT FOR BRAZIL

Dear Mr. Hrapsky,

Please deliver the attached final audit report to Dr. Nelmon Oliveira da Coasta, Director, Department of Inspection for Products of Animal Origin, Ministry of Agriculture and Provisions, Division of International Commerce Control. Please contact me via email at [manzoor.chaudry@fsis.usda.gov](mailto:manzoor.chaudry@fsis.usda.gov), if you have any further questions.

Best regards,

*by Don Carlson, acting Director*  
*Manzoor*

Manzoor Chaudry

cc list:

Alan Hrapsky, Counselor, US Embassy, Brasilia  
Emerson Kloss, Second Secretary, Embassy of Brazil  
OSTA/FAS  
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AJ Ogundipe, IES, OIA  
Brazil Country File

FSIS:OIA:IAS:DIRECTOR:202-205-3873:Brazil  
FINAL AUDIT LETTER February 9, 2009

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

**JUNE 11 THROUGH JULY 22, 2008**

**Food Safety and Inspection Service  
United States Department of Agriculture**

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## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority (DIPOA)
DIPOA	Department of Inspection of Products of Animal Origin
MAPA	Ministry of Agriculture, Livestock and Supply
SDA	Agriculture and Livestock Defense Secretariat
CGPE	International Export and Import Programs Coordination Division
DFA	Delegate for Federal Agriculture Office at State Level
SFA	Superintendent for the Federal Agriculture Office at the State Level
SIPAG	Federal Inspection of Products of Animal Origin at the State Level
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
SSOP	Sanitation Standard Operating Procedures
<i>E. coli</i>	<i>Escherichia coli</i>
<i>Salmonella</i>	<i>Salmonella</i> species

## 1. INTRODUCTION

The audit took place in Brazil from June 11 through July 22, 2008.

An opening meeting was held on June 11, 2008 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 of Products of Animal Origin (DIPOA) and/or representatives from the Service of Federal Inspection of Products of Animal Origin at the State Level (SIPAG).

## 2. OBJECTIVE OF THE AUDIT

This audit was a routine annual audit with special emphasis on humane handling and slaughter of livestock. 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 DIPOA, located in Brasilia; two SIPAG Offices located in two Federal Agriculture Offices at the State Level (Goiania and Sao Paulo); one government residue laboratory located in Porto Alegre; two private microbiology laboratories, one located in Lins and one located in Sao Paulo; eight meat slaughter and processing establishments and three meat processing establishments.

Competent Authority Visits			Comments
Competent Authority	Central	1	
	Regional (State)	2	
	Local	11	Establishment level
Microbiology Laboratories		2	
Residue Laboratories		1	
Meat Slaughter and Processing Establishments		8	
Meat Processing Establishments		3	

## 3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters or regional offices. The third part involved on-site visits to eleven

establishments: eight slaughter and processing establishments and three processing establishments. The fourth part involved visits to one government residue laboratory and two private microbiology laboratories. The LANAGRO residue laboratory was conducting analyses of field samples for Brazil's national residue control program. The LACI and SFDK microbiology laboratories were conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella*.

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.

- Establishment employees collect *Salmonella* carcass samples.
- *Salmonella* carcass samples are analyzed by private laboratories.
- Brazil suspends an establishment the third 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:

[http://www.fsis.usda.gov/Regulations\\_&Policies/Foreign\\_Audit\\_Reports/index.asp](http://www.fsis.usda.gov/Regulations_&Policies/Foreign_Audit_Reports/index.asp)

The following deficiencies were identified during the FSIS audit of Brazil's meat inspection system conducted August 16 through September 12, 2006:

- One of the eight establishments audited received a NOID for failure to consider stabilization performance standards in the establishment's hazard analysis.
- One of the eight establishments audited did not meet SSOP requirements.
- One of the eight establishments audited did not meet SPS requirements.
- Two of the eight establishments audited did not meet HACCP design and implementation requirements.
- Two of the eight establishments audited did not meet HACCP recordkeeping requirements.
- Not all inspection officials were employed by the Ministry of Agriculture.

Deficiencies identified during the August 16 through September 12, 2006 audit were found to be corrected during the August/September 2007 audit.

The following deficiencies were identified during the FSIS audit of Brazil's meat inspection system conducted in August 14 through September 13, 2007:

- One of the eight establishments audited did not meet SSOP requirements.
- One of the eight establishments audited did not meet SPS requirements.
- One of the eight establishments audited did not meet HACCP requirements.
- Three of the eight establishments audited did not meet HACCP recordkeeping requirements.
- One of the eight establishments audited did not meet corrective actions written in the HACCP plan and documented in the records. Actions taken to prevent recurrence of fecal contamination were not effective.

## 6. MAIN FINDINGS

### 6.1 Government Oversight

There have been no changes in the organizational structure and staffing since the previous audit in FY 2007.

The Department of Inspection of Products of Animal Origin (DIPOA) is under the Ministry of Agriculture, Livestock and Supply. DIPOA, Brazil's CCA, is responsible for providing government oversight for Brazil's meat inspection program. The International Export and Import Programs Coordination Division (CGPE) is one of the offices in DIPOA. DIPOA's responsibilities are to: Develop and manage export and import programs and policies including auditing procedures and certification of new establishments; manage the regulation and rule making process; develop and manage

field implementation strategies for FSIS food safety requirements; and coordinate field inspection activities nationwide. Each State in Brazil has a Superintendent for the Federal Agriculture Office (SFA) at the State Level. Federal Superintendents are political appointees of the Minister of Agriculture. On June 16, 2005, Ministry Order Number 300 was issued creating the structure of Service of Federal Inspection of Products of Animal Origin at the State Level (SIPAG). SIPAG Offices operate within the scope of the national organization of inspection operations coordinated by DIPOA and are responsible for the coordination and performance of inspection operations in the establishments located within the State. Each SIPAG office has a Chief that is in charge of the Inspection of Agricultural Products.

In addition, there are regional offices operating within the States. These regional offices are officially referred to as: Regional Technical Units of Agriculture, Livestock, and Supplies (UTRA). UTRA offices were established to support the activities of SIPAG offices and their units for the collection and processing of data in relation to inspection, livestock protection and also to furnish supplies, transportation and staffing for SIPAG offices. UTRA offices perform mainly administrative functions, however, the Chief of UTRA offices routinely conduct periodic supervisory reviews of U.S.-certified establishments.

#### 6.1.1 CCA Control Systems

The CCA maintains legal and supervisory control of SIPAG offices to ensure uniform implementation of inspection activities in all States containing U.S.-certified establishments.

DIPOA maintains records of audits conducted by their audit staff and evaluates the audits of each establishment's self control programs, the performance evaluation of the in-plant inspection team and all supporting documentation for export health certificates. The monthly supervisory audits are carried out by the Regional Supervisors in each State.

#### 6.1.2 Ultimate Control and Supervision

CGEP/DIPOA conducts audits of 40 % of the export establishments in each State, every six months. The CGEP/DIPOA audit team audits the SIPAG offices, establishment programs, and implementation of inspection programs within the establishments and the export health certificates with all supporting documentation produced by the veterinarian of the establishment. This same audit system is used to evaluate the performance of the inspection staff in the establishments.

Periodic supervisory reviews, including assessing and evaluating job performance of the veterinary inspector in-charge, are conducted by the State supervisors that are not assigned as a veterinarian in-charge of the same U.S.-certified establishment.

The following deficiencies in the control and supervision of Brazil's meat inspection system were observed:

- DIPOA officials did not demonstrate that they have effective oversight to ensure the accountability of the SIPAG officials and effective supervision of inspection activities at the establishment level.
- SIPAG did not demonstrate that it has adequate supervision over the Regional Veterinary Supervisors and inspectors in the certified meat establishments.
- The Regional Veterinary Supervisors did not demonstrate that they have adequate supervision over the inspectors in the certified meat establishments.
- Verification by all SIPAG offices of the implementation of U.S. requirements was inadequate.

### 6.1.3 Assignment of Competent, Qualified Inspectors

#### Veterinary Inspectors:

Veterinarians must possess a degree in veterinary medicine; submit an application for and pass a Civil Service test; pass a written test for initial training for theory/classroom training; and undergo on-the-job training for three to six months. Newly hired veterinarians are on probation for two years and are evaluated every six months during the probationary period.

#### Agents Non-Veterinary Post-mortem Inspectors:

Agents must possess an equivalent to a High School degree; submit an application for and pass a Civil Service test; pass a written test for initial training for theory/classroom training; and undergo on-the-job training for three to six months. Newly hired agents are on probation for two years and are evaluated every six months during the probationary period.

The following deficiencies in the assignment of competent, qualified inspectors of Brazil's meat inspection system were observed:

- In one processing establishment, inspection coverage was not provided during first shift processing operations when U.S.-eligible product was produced.
- The formal training of inspection personnel in the principles of HACCP/Pathogen Reduction was not sufficient to ensure enforcement of U.S. requirements.
- In newly-listed establishments, DIPOA inspection officials had inadequate or no formal training in HACCP/Pathogen Reduction for enforcement of U.S. requirements.

#### 6.1.4 Authority and Responsibility to Enforce the Laws

Records of Non Conformity (RNC) are issued for compliance deficiencies. An action plan must be submitted by the establishment addressing the non conformities identified during monthly supervisory reviews and DIPOA audits. The veterinarian in-charge of the establishment must evaluate and approve the action plan. The SIPAG office also evaluates the action plan and approves or disapproves the action plan and returns it to the veterinarian in-charge. The veterinarian in-charge verifies corrective actions and upon completion, returns the action plans, with verification dates, to SIPAG. Repeated noncompliance and failures to meet export requirements may, and have, led to suspension of the establishment's ability to export to the U.S. and other countries. Suspensions are issued by the CCA (DIPOA) with input from the veterinarian in-charge and the respective SIPAG office. Enforcement actions, mainly fraud, are handled through the legal system. Supporting documentation is presented to the Police and is handled through the court system. Fines are levied by DIPOA through the legal system (criminal court).

The sanitation, slaughter, and processing inspection procedures, and the standards and legal authority to enforce these requirements, are outlined and specified in a Brazil inspection law referred to as *Regulations for the Inspection of Industrial Sanitation for Products of Animal Origin (RIISPOA)*. The CCA has the authority and responsibility to ensure the enforcement of the inspection laws, and it has developed inspection policies and procedures by adopting FSIS inspection procedures to ensure effective enforcement of U.S. requirements. Circular 540/2006, implemented August 8, 2006, provides SIPAG with the authority to issue fines and other penalties to establishments for repetitive non-compliances identified by the State supervisor during periodic supervisory reviews. Not all FSIS requirements were enforced, for example:

- Two establishments were delisted for noncompliance with the implementation requirements for SSOP, SPS, and HACCP programs, lack of inspection coverage when U.S.-eligible product was produced, and lack of enforcement by the Government of Brazil (GOB) meat inspection officials.
- Seven establishments each received a Notice of Intent to Delist (NOIDs) for inadequate implementation of HACCP, SSOP, and SPS requirements and lack of enforcement of inspection requirements by the GOB meat inspection officials.
- In all 11 establishments, some SSOP requirements were not met.
- In nine of the 11 establishments, some SPS requirements were not met.
- In 10 establishments, some HACCP implementation requirements were not met.
- In all 11 establishments, the periodic supervisory reviews performed by the SIPAG/DIPOA did not adequately verify the implementation of HACCP, SSOP, and SPS requirements.

- In six establishments, DIPOA inspection officials were not verifying the reliability and effectiveness of the SSOP adequately to ensure that the establishment met the FSIS requirements.
- In four establishments, DIPOA inspection officials had conducted pre-operational and operational sanitation SSOP verifications but no deficiencies had been reported during periods ranging from two to six months.
- In six establishments, documentation of corrective actions taken in response to deficiencies identified during pre-operational and operational sanitation inspection did not include procedures to ensure appropriate disposition of product(s) that could be contaminated.
- In two establishments, DIPOA inspection officials did not review and determine the adequacy of corrective actions taken when a deviation from a Critical Limit (CL) occurred.
- In one establishment, DIPOA inspection officials were not verifying the adequacy of the establishment's HACCP plan for the first-shift operations to determine if it met FSIS requirements.
- In one establishment, DIPOA inspection officials were not verifying the adequacy of the establishment's HACCP plan for the second-shift processing operations to determine if it met FSIS requirements for direct measurement at a CCP.
- In two establishments, DIPOA inspection officials did not remove Specified Risk Materials (SRMs) (tonsils) in a sanitary manner during the post-mortem inspection.
- In one establishment, an establishment employee was not removing SRMs (spinal cords) in a sanitary manner to ensure that there was no cross-contamination with edible product (broken pieces of spinal cords were contacting edible parts of the carcasses).
- In five establishments, DIPOA inspectors at the post-mortem inspection stations were not incising and observing lymph nodes or the masticatory muscles of beef heads properly.

#### 6.1.5 Adequate Administrative and Technical Support

The Department of General Coordination of Laboratory Support at the Agriculture Ministry, Coordenação-Geral de Apoio Laboratorial – (CGAL/SDA/MAPA) is the oversight body that coordinates laboratory activities and conducts audits of government and private laboratories. There has been a system in place for the selection of auditors trained in ISO-17025 principals to conduct audits of residue laboratories since September 2007.

Residue laboratories: All auditors are employees of the Ministry of Agriculture. Audits started in September of 2007 to meet the yearly audit requirement for 2007.

Microbiology laboratories: A similar system is in place and coordinated by CGAL to audit all government and private microbiology laboratories one time per year. Internal audits are conducted by CGAL one time per year. CGAL was conducting two audits per year of government and private laboratories during the FY 2007 audit.

The following deficiencies in the administrative and technical support system were observed:

- The formal training of inspection personnel in the principles of HACCP/Pathogen Reduction was not sufficient to ensure enforcement of U.S. requirements.
- DIPOA made a commitment to FSIS on June 28, 2005, (letter # 83/CGPE /DIPOA/05) that certified microbiological laboratories would be audited bimonthly, jointly with the Coordination Office of Laboratory Support (CGAL). These audits were not being conducted at the frequency described.

## 6.2 Headquarters Audit

The auditor conducted a review of inspection system documents at the headquarters in Brasilia, and two SIPAG offices in Goiania (State of Goias) and Sao Paulo (State of Sao Paulo). 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.
- 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.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of 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.

Concerns identified as a result of examination of these documents will be reported in other sections of the report.

### 6.3.1 Audit of Regional and Local Inspection Sites

SIPAG offices are responsible for direct implementation of U.S. requirements and inspection oversight activities in establishments certified to produce products destined for export to the U.S. The auditor conducted reviews of two SIPAG offices located in Goiania and Sao Paulo and the inspection offices at the 11 establishments audited to assess the effectiveness of the delivery and implementation of inspection programs. The Chief for the Inspection of Animal Products and/or his designee, in each SIPAG

office and the veterinarian in-charge of each establishment audited were interviewed and the following records were reviewed:

- Internal audit reports conducted by CGPE.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training programs and records for inspectors.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with disease conditions and of inedible and condemned materials.
- Export product inspection and control.
- Enforcement records, consumer complaints and control of noncompliant product.
- Microbiology sampling and laboratory analyses for residues.
- Inspection records which included verification of the establishment's HACCP, SSOP, SPS, humane handling and slaughter of livestock, and SRM's control programs.
- Guidelines for testing for *Salmonella* and *E.coli*. testing in raw product.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Performance evaluation procedures and records.
- Conflict of interest polices and records.

Concerns identified as a result of examination of these documents will be reported in other sections of the report.

## 7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 11 establishments (eight slaughter establishments and three processing establishments). Two establishments were delisted for noncompliance in the implementation requirements for SSOP, SPS, and HACCP programs; no inspection coverage when U.S.-eligible product was produced; and lack of enforcement by the Government of Brazil (GOB) meat inspection officials. Seven establishments each received a Notice of Intent to Delist (NOID) for inadequate implementation of SSOP, SPS, and HACCP programs, and lack of enforcement of FSIS requirements.

These seven establishments may retain their eligibility for export to the United States provided that they correct all deficiencies noted during the audit within 30 days of the date the establishments were 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.

The following residue laboratory was reviewed:

The government residue testing laboratory LANAGRO, located in Porto Alegre, Rio Grande do Sul, was conducting tests on product destined for export to the U.S. for sulfas, arsenic, cadmium, lead, and mercury. The following deficiencies were observed:

- The Laboratory Quality Assurance (QA) officials performed an internal audit on September 3 through 29, 2007, that covered a 1-year period. A total of 10 deficiencies were observed such as: No personnel training program; no calibration records for thermometers, ovens, standard weights, reference weight, and micropipets; no SOP for equipments; identification of environmental safety issues; no documentation of equipment that returns after repair; and standards without original certificates.
- A follow-up audit was performed to evaluate the compliance with the issued Corrective Action Reports (CARs) on April 8, 2008, by the QA officials. Two of the 10 identified deficiencies were corrected and another two deficiencies were disputed by the laboratory Director. Agreed-upon correction dates were not complied with for the rest of the identified deficiencies.
- There were no records documenting that the identified deficiencies were corrected and no new dates were established for the implementation of 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.

One private microbiology laboratory, LACI, located in Lin, Sao Paulo, was conducting tests for *Salmonella* in bovine carcasses (DIPOA enforcement sampling), bovine carcass testing for generic *E. coli*, and for *Listeria spp.* (food-contact surfaces and environment) for RTE products from meat establishments.

The following deficiencies were noted:

- DIPOA made a commitment to FSIS on June 28, 2005, (letter # 83/CGPE /DIPOA/05) that certified microbiological laboratories would be subjected to bimonthly audits, jointly with the Coordination Office of Laboratory Support (CGAL). Bimonthly audits were not implemented by CGAL/DIPOA and only five audits were conducted by CGAL since June 28, 2005.
- CGAL/DIPOA officials conducted an audit of the LACI microbiology laboratory on December 7, 2005; however, CGAL officials did not verify the corrective

actions taken for the deficiency identified in the follow-up audit, nor did the laboratory officials have any records to document corrective actions taken.

- CGAL/DIPOA instructed the LACI laboratory officials on December 7, 2005, to implement bimonthly internal audits. The laboratory officials did not follow these instructions and had conducted only five internal audits since December 7, 2005.
- The private microbiology laboratory, SFDK, located in Sao Paulo, was conducting tests for *Salmonella* in bovine carcasses (DIPOA enforcement sampling), bovine carcass testing for generic *E. coli*, and testing for *Listeria spp.* (food contact surfaces and environment) for RTE products from meat establishments. The bimonthly audits were not implemented by CGAL/DIPOA and only three audits were conducted by CGAL since June 28, 2005.

## 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.

Based on the on-site audits of establishments and except as noted elsewhere in this report, 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, good personal hygiene practices, and good product handling and storage practices.

In addition, 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, 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 all 11 establishments were found to not adequately meet the FSIS regulatory requirements.

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

### 9.2 Sanitation

In eight of the 11 establishments, some of the sanitation performance standards (SPS) requirements were not met.

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

## 10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS 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. The auditor determined that Brazil's inspection system had adequate controls in place. No deficiencies were noted.

There have 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 reviews is 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.

### 11.1 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 11 establishments. Ten of the 11 establishments audited had not adequately implemented their HACCP plans.

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

### 11.2 Testing for Generic *E. coli*

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

Eight 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 all eight slaughter establishments.

## 11.2 Testing for *Listeria monocytogenes*

Five of the 11 establishments audited were producing ready-to-eat products for export to the United States. In accordance with United States requirements, the HACCP plans in these establishments had been reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to occur.

No deficiencies were observed.

## 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.

One government residue laboratory (LANAGRO) located in Porto Alegre, Rio Grande Do Sul was audited:

The following deficiencies were observed:

- The Laboratory Quality Assurance (QA) officials performed an internal audit September 3 through 29, 2007, that covered a 1-year period. A total of 10 deficiencies were observed, including the following:
  - No personnel training program; no calibration records for thermometers, ovens, standard weights, or reference weights; no SOP for equipment; lack of identification of environmental safety issues; no evidence of equipment returned after repair; and lack of original certificates for reference standards.
- A follow-up audit was performed on the previously issued Corrective Action Reports (CARs) on April 8, 2008, by the QA officials. Only two of the 10 deficiencies identified had been corrected and laboratory officials disagreed with two other deficiencies in the QA official's findings. Agreed-upon correction dates were not complied with for the rest of the identified deficiencies.
- There were no records to verify that the deficiencies identified were corrected, and no new target dates had been established for the corrective actions.

Brazil's National Residue Testing Plan for 2008 was being followed and was on schedule.

## 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 with the exception:

- All establishments were staffed with full-time veterinarians and non-veterinary inspectors. Continuous daily inspection was provided for all certified slaughter and processing establishments. However, in processing establishments, DIOPA inspection officials did not provide daily inspection coverage for the first shift processing operations when product for the United States was produced.

### 13.2 Testing for *Salmonella*

Brazil has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measure(s).

- Establishment employees collect *Salmonella* carcass samples.
- *Salmonella* carcass samples are analyzed by private laboratories.
- Brazil suspends an establishment the third time it fails to meet a *Salmonella* performance standard.

Eight 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 eight establishments.

### 13.3 Species Verification

Species verification was being conducted in those establishments in which it was required.

No deficiencies were observed.

### 13.4 Periodic Supervisory Reviews

During this audit it was found that in all establishments visited, periodic supervisory reviews of certified establishments were being performed and documented as required. The following deficiencies were observed:

- The Regional Veterinary Supervisors did not demonstrate that they had adequate supervision over the inspectors in the certified meat establishments.
- The periodic supervisory reviews performed by the Regions did not adequately verify the implementation of HACCP, SSOP, and SPS requirements.
- Supervision by SIPAG/DIPOA veterinary inspection officials over the second-shift and third-shift inspectors was inadequate or lacking.

### 13.5 Inspection System Controls

The CCA was required to demonstrate that all government inspectors assigned to establishments certified for U.S. export were being paid by the government.

- The CCA continues to use veterinary inspectors and non-veterinary agents who are employed by the municipalities, in spite of assurances that the system to convert all veterinary inspectors and agents to Ministry of Agriculture employees is in place. The list of federal SIF inspection personnel has been published in the *Diario Oficial da Uniao* and officials stated yet again that, at some future time, they will be positioned to replace municipal contract SIF employees.
- Although some veterinary inspectors and non-veterinary inspectors are paid by the Municipalities, supervision and oversight is provided by the National Government.

Records of salary payment for federal and municipal inspectors and receipts for payment by inspectors to the establishment for meals and transportation were reviewed.

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 with the following exceptions:

- Two of the 11 establishments audited were delisted.
- Seven of the 11 establishments audited each received a Notice of Intent to Delist (NOID).
- In all 11 establishments, some SSOP requirements were not met.
- In nine of the 11 establishments audited, some SPS requirements were not met.
- In 10 of the 11 establishments audited, one or more HACCP problems were reported.
- The periodic supervisory reviews performed by the Regional Supervisors did not adequately verify the implementation of HACCP, SSOP, or SPS requirements.
- In three establishments, there was no supervision over the second shift inspectors by DIPOA inspection officials.
- In two establishments, supervision over the second shift inspectors by DIPOA inspection officials was inadequate.
- In one establishment, DIPOA inspection officials did not provide daily inspection coverage for the first shift operations when product for the United States was produced.
- In one establishment, DIPOA officials were not verifying the adequacy and effectiveness of the establishment's first-shift pre-operational and operational sanitation SSOP to ensure that FSIS requirements were met.
- In two establishments, DIPOA inspection officials were either not verifying, or not adequately verifying, the adequacy of the establishment's HACCP plan for the first shift processing operation.

- In two establishments, DIPOA inspection officials did not review and determine the adequacy of corrective actions taken when a deviation from Critical Limits occurred.
- In five establishments, DIPOA inspectors at the post-mortem inspection stations were not incising and observing the lymph nodes or the masticatory muscles of beef heads properly.

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

Lastly, 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 July 22, 2008, in Brasilia with the CCA. At this meeting, the preliminary findings from the audit were presented by the auditor.

The CCA understood and accepted the findings.

*For*  
Faizur R. Choudry, DVM  
Senior Program Auditor

*by* Don Carlson, DVM

## 15. ATTACHMENTS

Individual Foreign Establishment Audit Forms  
Foreign Country Response to Draft Final Audit Report (when it becomes available)

United States Department of Agriculture  
Food Safety and Inspection Service

**Foreign Establishment Audit Checklist**

1. ESTABLISHMENT NAME AND LOCATION Ferrelra International Ltd. Tres Rios, Rio de Janeiro	2. AUDIT DATE 06/16/2008	3. ESTABLISHMENT NO. SIF 13	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X	37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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.	X	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	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		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.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58. Notice of Intent to Delist (NOID)	X
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

## 60. Observation of the Establishment

Establishment SIF 13, Ferrela International Ltd. , Tres Rios, RJ, Brazil; June 16, 2008. Processing

10/51. a) Product residues and pieces of meat from the previous day's operations were observed in the processing room on ready-for-use food-contact surfaces (plastic screens and metal racks for beef jerky).

b) Condensate from ceilings and an upper panel of a door in the equipment washing room was dripping onto cleaned/sanitized plastic screens and racks. Cleaned/sanitized plastic screens and racks for edible product were being splashed from the floor water during washing of unclean containers with a pressure hose in the washing room. [Regulatory references: 9 CFR 416.13(b) and 416.17]

11/51. Establishment officials were not routinely evaluating the adequacy and effectiveness of the Sanitation Standard Operating Procedures (SSOP) to prevent direct product contamination or adulteration. Records indicated that, during a period of several months, no pre-operational or operational SSOP deficiencies had been identified by establishment employees. [9 CFR 416.14 and 417.17]

13/51. The establishment did not properly document corrective actions for the deficiencies identified, to prevent recurrence of direct product contamination or adulteration. [9 CFR 416.16(a) and 416.17]

15/51. The establishment's HACCP plan did not address the frequency and procedures of the calibration of process-monitoring instruments in the on-going verification activities. [9 CFR part 417.4(a)(2)(i), 9 CFR part 417.2 (c) 7, and 417.8]

51. a) DIPOA inspection officials had inadequate supervision over the second shift inspectors. [9 CFR 327.2(a)(2)(i)(B)]

b) Second-shift DIPOA inspection officials did not have adequate HACCP/Pathogen Reduction training. [9 CFR 417.7]

58. After consideration of the above findings, the DIPOA/MAPA veterinary officials issued a Notice of Intent to Delist (NOID). Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States

61. NAME OF AUDITOR  
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Dr. Faizur R. Choudry*

United States Department of Agriculture  
Food Safety and Inspection Service

**Foreign Establishment Audit Checklist**

1. ESTABLISHMENT NAME AND LOCATION JBS S/A Barretos, Sao Paulo	2. AUDIT DATE 07/03-04/08	3. ESTABLISHMENT NO. SIF 76	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements		Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP			33. Scheduled Sample	
8. Records documenting implementation.			34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>			<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.			37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.			38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.			39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>			40. Light	X
14. Developed and implemented a written HACCP plan.	X		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	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>			45. Equipment and Utensils	
18. Monitoring of HACCP plan.	X		46. Sanitary Operations	X
19. Verification and validation of HACCP plan			47. Employee Hygiene	X
20. Corrective action written in HACCP plan.	X		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.			<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>			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	
<b>Part D - Sampling Generic E. coli Testing</b>			55. Post Mortem Inspection	X
27. Written Procedures			<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis			56. European Community Directives	O
29. Records			57. Monthly Review	X
<b>Salmonella Performance Standards - Basic Requirements</b>			58. Notice of Intent to delist (NOID)	X
30. Corrective Actions			59.	
31. Reassessment				
32. Written Assurance				

## 60. Observation of the Establishment

Establishment SIF 76, JBS, Barretos, SP, Brazil; July 03-04, 2008. Slaughter/Processing

10/51. a) Grease and black discoloration from the previous day's operations were observed on food-contact surfaces (hooks for beef carcasses), ready for use in the slaughter room. b) Meat and fat particles were observed on a plastic conveyor belt and flaking paint was seen on supports along both sides of the conveyor belt in the boning room. c) Fat and meat residues from the previous day's operations were observed on food contact surfaces of a cooker ready for use in the processing room. d) Pieces of fat from the previous day's operations were observed in the sausages stuffer, ready for use in the processing room. e) Fat residues from the previous day's operations were observed in a chute for edible product and in a stomach denuder, ready for use in the tripe room. f) Paint was observed on food-contact surfaces (hooks for tripe) ready for use in the tripe room. g) Beef forequarters were contacting non-food-contact surfaces (posts) in the boning room. h) Blood was observed on viscera pans and beef head hooks, ready for use in the slaughter room. i) An unclean shackle chain in the slaughter room was contacting the skinned parts of beef hindquarters at the first leg transfer station. [Regulatory references: 9 CFR 416.13 and 416.17]

14/51. a) The establishment's flow chart did not describe all process steps and product flow: Empty can receiving and storage, packaging materials, the retained rail for carcasses, incubation of cans, and removal of eyes and tonsils were not included. [9 CFR 417.2(a)(2) and 417.8]

b) The establishment did not include Specified Risk Materials (receiving of animals, removal of eyes, tonsils and distal ileums), packaging materials at the reception, or storage of cans in the hazard analysis to determine the food safety hazards reasonably likely to occur in the process and identify preventive measures that the establishment could apply to control those hazards. [9 CFR 417.2(a)(1) and 417.8]

18/51. a) The establishment's HACCP plan did not adequately list the monitoring procedures for Critical Control Point (CCP) 4 B to ensure compliance with the Critical Limit (CL). [9 CFR 417.2(c)(4) and 417.8]

b) The establishment's HACCP plan did not adequately describe a maximum or minimum value to a physical, biological, or chemical hazard that must be controlled at a CCP 3 B to prevent, eliminate, or reduce the hazard to an acceptable level. [9 CFR 417.2(c)(3) and 417.8]

20/51. The establishment did not take corrective actions adequately when deviations from a CL (121.1°C) at CCP 4 B occurred. The corrective actions taken did not fully document that (1) the cause of the deviation was eliminated, (2) the CCP was brought under control, (3) measures to prevent recurrence were established, and (4) no product that was adulterated as a result of the deviation entered commerce. [9 CFR 417.3(a) and 417.8]

22/51. The HACCP verification records for CCP 1B did not contain the verification times or the signature or initials of the person performing the verification. [9 CFR 417.4(a)(2) and 417.5 and 9 CFR 417.8]

39/51. a) Fat and meat residues were observed in the processing room on a support structure above edible product. [9 CFR 416.2(b) and 416.17]

b) An accumulation of black residue was observed in a chute through which cleaned/sanitized six-pound cans were passing to the product filling line. The chute was not constructed to prevent product adulteration. [9 CFR 416.2(b)(1) and 416.17]

40/51. There was insufficient light (200 lux) at the beef head washing cabinet to ensure that sanitary conditions were maintained and product was not adulterated. [9 CFR 416.2(c)]

46/51. Water was observed in empty 6-pound and 12-ounce cans after washing/sanitizing and before filling with product. [9 CFR 416.4 and 318.301(a)(3) and 416.17]

47/51/56. An employee was observed handling a dirty shackle chain and contacting the hide and, without washing his hands, handling exposed carcasses at the first leg-transfer station in the slaughter room. [9 CFR 416.5(a) and 416.17]

51. a) DIPOA inspection officials were not verifying the adequacy and effectiveness of the SSOP adequately to ensure that the establishment met the FSIS requirements. Records indicated that the inspection officials had conducted operational sanitation SSOP verifications for the first and second shift operations but no deficiencies had been observed since the first of the year. [9 CFR 416.17]

b) DIPOA inspection officials had no supervision over the second-shift inspectors. [9 CFR 327.2(a)(2)(i)(B)]

d) Second-shift DIPOA inspection officials did not have adequate HACCP/PR training. [9 CFR 417.7]

55/51. A government inspector at the post-mortem head-inspection station was not incising and observing the masticatory muscles or lymph nodes properly. [9 CFR 310.1]

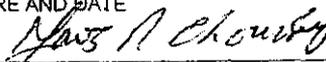
57/51. Periodic supervisory reviews were routinely conducted by the Regional Veterinarians, but there was no record of any findings concerning the aforementioned HACCP, SSOP, and SPS non-compliances. [9 CFR 416.17]

58. Following a review of the findings by the FSIS auditor, the establishment was issued a Notice of Intent to Delist (NOID). Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

61. NAME OF AUDITOR

Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE



United States Department of Agriculture  
Food Safety and Inspection Service

**Foreign Establishment Audit Checklist**

1. ESTABLISHMENT NAME AND LOCATION Comercio e Industria, Importacao e Exportacao Ltd. Hulha Negra, Rio Grande de Sul	2. AUDIT DATE 07/08-09/08	3. ESTABLISHMENT NO. SIF 226	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.	X	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	X
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	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.	X	46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQU/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	X
<b>Salmonella Performance Standards - Basic Requirements</b>		58. Notice of Intent to Delist (NOID)	X
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

## 60. Observation of the Establishment

Establishment SIF 226, Comercio e Industria, Importacao e Exportacao. Hulha Negra, Brazil; July 08-09, 2008. Processing

10/51. a) A piece of plastic from the previous day's operations was observed on the food-contact surface of a meat grinder ready for use in the processing room. b) Product residue was observed on a food-contact surface at the end of a conveyor belt in the processing room. c) Fat and meat residues from the previous day's operations were observed on food contact surfaces of a beef mixer ready for use in the processing room. d) Water left over from washing/sanitizing from the previous day's operations was observed inside ready-for-use cookers in the processing room. All these deficiencies were observed during pre-operational sanitation inspection. [Regulatory references: 9 CFR 416.13 and 416.17]

14/51. a) Microbial hazards in the can-cooling step were not included in the hazard analysis, and the hazard analysis did not identify the preventive measures the establishment could apply to control those hazards. b) Physical hazards in the empty can storage room had not been included in the hazard analysis, and the hazard analysis did not identify the preventive measures the establishment could apply to control those hazards. [9 CFR 417.2(a)(1) and 417.8]

18/51. a) The establishment's HACCP plan did not adequately list the monitoring procedures for Critical Control Point (CCP) 1 B (beef jerky) to ensure compliance with the Critical Limit (CL). [9 CFR 417.2(c)(4) and 417.8]  
b) The establishment's HACCP plan did not list the maximum or minimum value for the physical hazard identified (bone) that must be controlled at a CCP 1F to prevent, eliminate, or reduce it to an acceptable level. [9 CFR 417.2(c)(3) and 417.8]

22/51. a) The HACCP monitoring records for the corrective actions at CCPs 1B and 2B did not contain the signatures or initials of the monitors. [9CFR 417.4(a)(2) and 417.5 and 9CFR 417.8]

39/51. An elevator chute for transferring edible product was not sealed properly to prevent the entry of insects and other vermin. [9 CFR 416.2(b) and 416.17]

42/51 A buildup of rust and black extraneous materials was observed inside the pipes in the potable-water storage tanks. Also, rough and broken cement walls and ceilings around the windows on the potable water tanks were not adequately maintained to prevent adulteration. [9CFR 416.2(e)(3) and 416.17]

46/51. a) Fat and extraneous materials were observed under a scale in the processing room during pre-operational sanitation inspection. b) Pieces of plastic and extraneous materials were found inside the washing cabinet for empty cans. d) Dust and debris were observed in a chute through which washed and sanitized empty cans were passing to the product-filling line. [9 CFR 416.4(d) and 416.17]

51/57. a) Periodic supervisory reviews were routinely conducted by the Regional Veterinarians, but there was no record in their reports of any findings concerning the aforementioned HACCP, SSOP, and SPS non-compliances. [9 CFR 416.17]  
b) DIPOA inspection officials were not verifying the adequacy and effectiveness of the SSOP adequately to ensure that the establishment met the FSIS requirements. Records indicated that DIPOA inspection officials found four deficiencies during pre-operational sanitation inspection and nine deficiencies for Sanitation Performance Standards (SPS) during the operational sanitation inspection for the first- and second-shift operations during the previous five months. [9 CFR 416.17]  
c) DIPOA inspection officials had inadequate supervision over the second-shift inspectors. [9 CFR 327.2(a)(2)(i)(B)]  
d) The second-shift DIPOA inspection officials did not have adequate HACCP/Pathogen Reduction training. [9 CFR 417.7]

58. Following a review of the findings by the FSIS auditor, the establishment was issued a Notice of Intent to Delist (NOID). Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

61. NAME OF AUDITOR  
Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Faizur R. Choudry*

United States Department of Agriculture  
Food Safety and Inspection Service

**Foreign Establishment Audit Checklist**

1. ESTABLISHMENT NAME AND LOCATION Bertin Ltda Lins, Sao Paulo	2. AUDIT DATE 6/30 & 7/1/08	3. ESTABLISHMENT NO. SIF 337	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above		39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.	X	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	X
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.	X	46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	X
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	X
Salmonella Performance Standards - Basic Requirements		58. Notice of Intent to Delist (NOID)	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Establishment SIF 337, Bertin Ltd, Lins, SP, Brazil; June 30 & July 01, 2008. Slaughter/Processing

10/51. a) Product residues, pieces of meat, and broken screen links from the previous day's operations were observed on food-contact surfaces (plastic screens for beef jerky), ready for use in the processing room. b) Cleaned/sanitized, ready-for-use equipment in the processing room was being splashed with water from the floor during cleaning. c) Necks and forefeet of long beef carcasses in the slaughter room were contacting wet floors and a rail guard after final washing of carcasses. d) Tonsils were not removed in a sanitary manner. [Regulatory references: 9 CFR 416.13 and 416.17]

14/51. a) The establishment's flow chart did not describe all process steps and product flow (the retained-carcass rail was not included). [9 CFR 417.2(a)(2) and 417.8]

b) Specified Risk Materials were not included in the hazard analysis to determine the food safety hazards reasonably likely to occur in the production process and identify the preventive measures the establishment could apply to control those hazards. [9 CFR 417.2(a)(1) and 417.8]

18/51. a) The establishment's written HACCP plan did not adequately list the monitoring procedures for Critical Control Point (CCP) 1B to ensure compliance with the Critical Limit (CL). [9 CFR 417.2(c)(4) and 417.8]

b) The establishment's HACCP plan did not adequately list the verification procedures and frequencies for the calibration of process-monitoring instruments and corrective actions for CCPs 3B and 11B to ensure compliance with the monitoring program. [9 CFR 417.2(c)(7) and 417.8]

20/51. The establishment did not take corrective actions adequately when deviations from a CL (72°C product temperature) at CCP 17B occurred on June 27, 2008, due to failure of the temperature monitoring instrument. There were no records that documented that (1) the cause of the deviation was eliminated; (2) the CCP was brought under control after corrective actions (including calibration of the instrument) were taken; or (3) measures to prevent recurrence were established. [9 CFR 417.3(a) and 417.8]

22/51. a) The HACCP-monitoring records were not signed or initialed for the CL for zero tolerance for feces, ingesta, and milk at CCP 1B by the establishment employee making the entries. [9 CFR 417.5(b) and 417.8]

b) The HACCP verification records did not document the results of on-going verification activities for CCP 1B, including the times when they were performed, the signature or initials of the person performing the verification, quantifiable values observed by direct measurement, or the calibration of process-monitoring instruments. [9 CFR 417.4(a)(2) and 417.5 and 9 CFR 417.8]

39/51. A rusty beam was observed in the slaughter room above the carcass rail after final washing. [9 CFR 416.2(b) and 416.17]

42/51. The potable water storage tank was found with deteriorated loose plastic and rough, broken cement ceilings inside three windows on its roof. There was a strong possibility of adulteration of the water. [9 CFR 416.2(e)(3)]

46/51. A measurable amount of water was observed in empty 12-ounce and 6-pound cans after washing/sanitizing and before filling. [9 CFR 416.4 and 318.301(a)(3) and 416.17]

51. a) DIPOA inspection officials were not verifying the adequacy and effectiveness of the SSOP adequately to ensure that the establishment met FSIS requirements. Records indicated that the inspection officials had conducted pre-operational sanitation SSOP verifications but no deficiencies had been reported since the first of this year. [9 CFR 416.17]

b) DIPOA inspection officials had no supervision over the second-shift inspectors. [9 CFR 327.2(a)(2)(i)(B)]

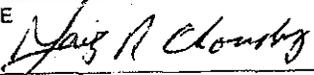
c) DIPOA inspection officials were not fully verifying the adequacy of the HACCP plan(s) for the second shift operations to determine if it met FSIS requirements for direct measurement at a CCP. [9 CFR 417.8]

d) The second shift DIPOA inspection officials did not have adequate HACCP/Pathogen Reduction training. [9 CFR 417.7]

55/51. A DIPOA inspector at the post-mortem inspection station was not incising and observing the masticatory muscles of beef heads properly. [9 CFR 310.1]

57/51. a) Periodic supervisory reviews were routinely conducted by the Regional Veterinarians, but there was no record of any findings concerning the aforementioned HACCP, SSOP, and SPS non-compliances. [9 CFR 416.17]

58. Following a review of the findings by the FSIS, the establishment was issued a Notice of Intent to Delist (NOID). Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

61. NAME OF AUDITOR Faizur R. Choudry, DVM	62. AUDITOR SIGNATURE AND DATE 
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United States Department of Agriculture  
Food Safety and Inspection Service

**Foreign Establishment Audit Checklist**

1. ESTABLISHMENT NAME AND LOCATION  JBS S/A Andradina, Sao Paulo	2. AUDIT DATE 07/14-15/08	3. ESTABLISHMENT NO. SIF 385	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X	37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.	X	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	X
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	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		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.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	X
<b>Salmonella Performance Standards - Basic Requirements</b>		58. Delisted	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

## Establishment SIF 385, JBS, Andradina, SP, Brazil; July 14-15, 2008. Slaughter/Processing

10/51. a) Meat residue was observed inside the carcass splitting saw, ready for use in the slaughter room. b) Black specks and other extraneous material were observed on viscera conveyor pans, ready for use in the slaughter room. c) Fat and meat protein build-up was observed on the meat conveyor "spiral" in the cooker, ready for use in the corned-beef processing room (it was not possible to verify sanitary conditions without dismantling the equipment). d) Beef products in plastic tubes were contacting employees' work platform and boots a processing room. e) Condensate was dripping into a container for edible beef broth from an overhead chute for cooked beef in the corned-beef processing room. f) Meat and fat residues were observed on a plastic panel at the end of a conveyor belt used to prevent meat from falling from the conveyor belt, ready for use in the corned beef processing room. g) Pieces of meat, fat, rubber, stones, metal, and residue left over from sanitizing agents were observed in the meat broth collecting tanks, ready for use, in the beef extract room. h) Primary plastic wrapping materials were contacting employees' boots and street clothes during wrapping of meat in the boning room. [Regulatory references: 9 CFR 416.13 and 416.17]

11/51. Establishment officials were not routinely evaluating the adequacy and effectiveness of the Sanitation Standard Operating Procedures (SSOP) to prevent direct product contamination or adulteration. [9 CFR 416.14 and 417.17]

13/51. Documentation of corrective actions taken in response to deficiencies identified during pre-operational and operational sanitation did not include some of the required parts of the corrective actions. [Regulatory references: 9CFR 416.15(b), 9CFR 416.16(a), and 9CFR 416.17]

14/51. Physical hazards were identified in the hazard analysis as reasonably likely to occur at the reception of empty cans, but the establishment did not identify the preventive measures it could apply to control those hazards. [9 CFR 417.2(a)(1) and 417.8]

20/51. The establishment failed to take corrective actions fully when deviations from Critical Limits (CL) at Critical Control Point (CCP) 121C occurred. There were no records that documented that (1) the cause of the deviation was eliminated; (2) the CCP was brought under control after corrective action was taken; (3) measures to prevent recurrence were established, and (4) no product that was adulterated as a result of the deviation entered commerce. [9 CFR 417.3(a) and 417.8]

40/51. There was insufficient light intensity at the beef head washing cabinet to ensure that sanitary conditions were maintained and product was not adulterated. [9 CFR 416.2(c)]

51. a) DIPOA inspection officials were not verifying the adequacy and effectiveness of the SSOP adequately to ensure that the establishment met FSIS requirements. Records indicated that DIPOA inspection officials had found only seven deficiencies during pre-operational and operational sanitation SSOP verifications during the previous three months. [9 CFR 416.17]

b) One DIPOA veterinarian did not have adequate HACCP/Pathogen Reduction training. [9 CFR 417.7]

57/51. Periodic supervisory reviews were routinely conducted by the Regional Veterinarians, but there was no documentation of any findings concerning the aforementioned HACCP and SSOP non-compliances. [9 CFR 416.17]

58. Due to non-compliance with implementation the requirements of SSOP, SPS, HACCP programs and lack of enforcement by the Government of Brazil (GOB) meat inspection officials, this establishment did not meet FSIS requirements. All the above deficiencies were discussed with GOB meat inspection officials and they agreed to remove Establishment SIF 0385 from the list of establishments eligible to export meat and meat products to the United States, effective July 15, 2008.

61. NAME OF AUDITOR  
Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Faizur R. Choudry*

United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION JBS S/A Goiania, Goias	2. AUDIT DATE 06/12-13/08	3. ESTABLISHMENT NO. SIF 862	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	X
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.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Establishment SIF 862, JBS S/A, Goiania, Goias, Brazil; June 12-13, 2008. Slaughter/Processing

10/51. a) Paint residues were observed on food-contact surfaces (working tables and pans) in the offal, tripe, and casing rooms during pre-operational sanitation inspection. [Regulatory references: 9 CFR 416.13(a) and 416.17]

b) An employee's boots were contacting food-contact surfaces at the hindquarter-trimming station in the boning room. [9 CFR 416.13(b) and 416.17]

22/51. a) The HACCP monitoring records were not signed or initialed by the establishment employee making the entries when a deviation from a critical limit occurred. [9 CFR 417.5(b) and 417.8]

b) The HACCP verification records did not document the results of a direct measurement (quantifiable values) at CCP 1B. [9 CFR part 417.5(a)(3) and 417.8]

39/51. Doors to offal, tripe, boning, and dry storage rooms were not sealed properly to prevent the entry of vermin. [9 CFR 416.2(a)(b) and 416.17]

41/51. Beaded condensate was observed on overhead pipes in the carcass-washing room. [9 CFR 416.2 (d) 416.17]

45/51. Employees' scabbards were not designed to facilitate thorough cleaning and to ensure that their use would not cause the adulteration of product during processing. It was not possible for inspection program employees to determine whether they were in sanitary condition. [9 CFR 416.3(a)(b) and 416.17]

The auditor was assured by the inspection officials and/or establishment personnel that all deficiencies found in this audit would be scheduled for correction

61. NAME OF AUDITOR  
Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Faizur R. Choudry*

United States Department of Agriculture  
Food Safety and Inspection Service

**Foreign Establishment Audit Checklist**

1. ESTABLISHMENT NAME AND LOCATION  Independencia S/A Janauba, Minas Gerais (MG)	2. AUDIT DATE 06/23/2008	3. ESTABLISHMENT NO. SIF 2471	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X	37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	X
14. Developed and implemented a written HACCP plan.	X	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	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	X
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	X
<b>Salmonella Performance Standards - Basic Requirements</b>		58. Notice of Intent to Delist (NOID)	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Establishment SIF 2471, Independencia, Janauba, Minas Gerais, Brazil; June 23, 2008. Slaughter/Processing

10/51. a) Forelegs of beef carcasses were contacting non-food-contact surfaces (employees' working platforms) in the beef carcass quartering room. b) Beef carcasses moving on the rail from carcass quartering area to boning room were contacting the floor. c) Beef carcasses were contacting non-food-contact surfaces (a plastic drain hose) at the carcass splitting station in the slaughter room. d) Tonsils (Specified Risk Materials, or SRMs) were not removed in a sanitary manner by the DIPOA inspector during the post-mortem inspection (his knife and meat hook, and also the beef tonsils, were contacting the edible parts of the heads). [9 CFR 416.13(b)(c) and 416.17]

11/51. Establishment personnel were not routinely evaluating the adequacy and effectiveness of the Sanitation Standard Operating Procedures (SSOP) to prevent direct product contamination or adulteration. [9 CFR 416.14 and 417.17]

13/51. Establishment employees were not adequately describing the deficiencies or the documenting of corrective actions taken in response to deficiencies identified during pre-operational and operational sanitation inspection. The written descriptions did not include some of the required parts of corrective actions. [9 CFR 416.15 (b) and 416.16(a) and 416.17]

14/51. a) The establishment's flow chart did not describe all process steps and product flow (the rail for carcasses retained for post-mortem inspection was not included). [9 CFR 417.2(a)(2) and 417.8]

b) Tonsils (SRMs) were not included in the hazard analysis to determine the food safety hazards reasonably likely to occur in the production process and identify the preventive measures the establishment could apply to control those hazards. [9 CFR 417.2(a)(1) and 417.8]

22/51. a) The HACCP monitoring records were not signed or initialed by the establishment employee making the entries when a deviation from a critical limit occurred. [9 CFR 417.5(a)(3) and 9 CFR 417.8]

b) The HACCP verification records did not document the results of ongoing verification; they did not include times when the verification was performed; signatures or initials of the persons performing the verification; observed, quantifiable values (direct measurement of Critical Limits at CCP 1B), or the calibration of process-monitoring instruments. [9 CFR 417.4(a)(2) and 417.5 and 9 CFR 417.8]

39/51. Numerous gaps at the junctions of ceilings and walls in the offal packaging materials storage room were not sealed properly to prevent the entrance of rodents and other vermin. [9 CFR 416.2(b) and 416/17]

40/51. Light at the beef head washing cabinet was not of sufficient intensity to ensure that sanitary conditions were maintained and product was not adulterated. [9 CFR 416.2(c)]

47/51. An employee at the first hind-leg transfer station was observed touching the hide and, without washing his hands, handling cleaned/sanitized beef hooks. [9 CFR 416.5(a) and 416.17]

51. DIPOA inspection officials were not verifying the adequacy and effectiveness of the SSOP adequately to ensure that the establishment met FSIS requirements. Records indicated that the inspection officials had conducted pre-operational and operational sanitation SSOP verifications, but no deficiencies had recorded for the previous two months. [9 CFR 416.17]

55/51. A government inspector at the post-mortem inspection station was not incising and observing the lymph nodes or the masticatory muscles of beef heads properly. [9 CFR 310.1]

57/51. Periodic supervisory reviews were routinely conducted by the Regional Veterinarians, but there was no record of any findings concerning the aforementioned HACCP, SSOP, and SPS non-compliances. The Central Competent Authority (CCA Brasilia) DIPOA had conducted a review on June 3, 2008, but the inspection officials did not fully document the corrective actions taken for the identified SSOP deficiencies. [9 CFR 416.17]

58. Following a review of the findings by the FSIS auditor, the establishment was issued a Notice of Intent to Delist (NOID). Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

61. NAME OF AUDITOR  
Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Faizur R. Choudry*

United States Department of Agriculture  
Food Safety and Inspection Service

**Foreign Establishment Audit Checklist**

1. ESTABLISHMENT NAME AND LOCATION International Food Company Industria de Alimentos Itupeva, SP	2. AUDIT DATE 06/26/2008	3. ESTABLISHMENT NO. SIF 3673	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X	37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.	X	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	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		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.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	X
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	X
<b>Salmonella Performance Standards - Basic Requirements</b>		58. Delisted	X
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

## 60. Observation of the Establishment

Establishment SIF 3673, International Food Company, Industria de Alimen, Itopeva, SP, Brazil; June 26, 2008. Processing

10/51. a) Blood residue from the previous day's operation was observed on a food contact surface (tumbler) in the processing room. b) Water was splashing from the floor of a washing facility onto the brine filters during a washing operation and clean filters were contacting non-food-contact surfaces in the processing room. c) A plastic hose in the processing room was contacting non food contact surfaces (electrical wires and a brine pressure pump) and, without being washed or sanitized, was used to transfer marination solution from the container into the tumbler. d) Condensate was dripping from the bottom part of a working table in the processing room onto edible product (meat juices) and a container with edible product was placed very close to an employees' working platform, with a strong potential for contamination. e) Screens used for edible product in the processing room were broken and deteriorated. f) Ready-to-use metal racks in the equipment room were found with product residues. g) Condensate was dripping onto clean racks from an upper panel door and wall through which these racks were being transported to the waiting room. [Regulatory references: 9 CFR 416.13 and 416.17]

11/51. Establishment officials were not routinely evaluating the adequacy and effectiveness of the Sanitation Standard Operating Procedures (SSOP) to prevent direct product contamination or adulteration. Many of the steps written in the cleaning procedures in the establishment's SSOP were not followed. [9 CFR 416.14 and 417.17]

13/51. Documentation of corrective actions taken in response to deficiencies identified during pre-operational and operational sanitation inspection did not include procedures to ensure appropriate disposition of product(s) that could be contaminated. [9CFR 416.15(b), 9CFR 416.16(a), and 9CFR 416.17]

14/51. a) The establishment flow chart did not describe all process steps and product flow (liquid smoking of beef jerky was not included in the flow chart). [9 CFR 417.2(a)(2) and 417.8]  
 b) Specified Risk Materials were not included in the hazard analysis to determine the food safety hazards reasonably likely to occur in the production process and to identify the preventive measures the establishment could apply to control those hazards. [9 CFR 417.2(a)(1) and 417.8]  
 c) Injection of brine solution in the product was included in the hazard analysis to determine the food safety of hazards reasonably likely to occur in the production process, but the document did not identify the preventive measures the establishment could apply to control those hazards. [9 CFR 417.2(a)(1) and 417.8]

20/51. Beef jerky was not receiving heat penetration treatment equally in the smoke house as described in the written HACCP plan, due to overlapping of jerky pieces. Establishment officials identified the deviation (unforeseen hazard) but failed to take any corrective actions for the non-compliance as required under the HACCP plan. [9 CFR 417.3(b) and 417.8]

50/51. DIPOA inspection officials did not provide daily inspection coverage for the first shift operations when product for the United States was produced. [9 CFR 327.2(a)(2)(ii)(D)]

51. a) DIPOA officials were not verifying the adequacy and effectiveness of the establishment's first-shift pre-operational and operational sanitation SSOP to ensure that FSIS requirements were met. [9 CFR 416.17]  
 b) Records indicated that the inspection officials had conducted pre-operational and operational sanitation SSOP verifications for the second and third shift operations but no deficiencies were noted since January 2008. [9 CFR 416.17]  
 c) DIPOA inspection officials were not verifying the adequacy of the establishment's HACCP plan for the first shift processing operation. [9 CFR 417.8]  
 d) First and third-shift DIPOA inspection officials did not have adequate HACCP/Pathogen Reduction training. [9 CFR 417.7]

57/51. Periodic supervisory reviews were routinely conducted by the Regional Veterinarian, but there was no record of any findings concerning the aforementioned HACCP and SSOP non-compliances. The DIPOA regional supervisor had not provided inspection coverage for the first shift operations. [9 CFR 416.17 and 417.8 and 327.2(a)(2)(ii)(D)]

58. Due to non-compliance with implementation the requirements of SSOP, SPS, and HACCP programs, lack of inspection coverage when US-eligible product was produced, and other lack of enforcement by the Government of Brazil (GOB) meat inspection officials, this establishment did not meet FSIS requirements. All the above deficiencies were discussed with GOB meat inspection officials and they agreed to remove Establishment SIF 3673 from the list of establishments eligible to export meat and meat products to the United States. effective June 26, 2008.

61. NAME OF AUDITOR  
Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Faizur R. Choudry*

United States Department of Agriculture  
Food Safety and Inspection Service

**Foreign Establishment Audit Checklist**

1. ESTABLISHMENT NAME AND LOCATION Marfrig Industria e Comercio de Alimentos S/A Bataguassu, Mato Grosso do Sul	2. AUDIT DATE 07/16-17/08	3. ESTABLISHMENT NO. SIF 4238	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	X
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	X
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	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	X
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		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	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	X
<b>Salmonella Performance Standards - Basic Requirements</b>		58. Notice of Intent to Delist (NOID)	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment SIF 4238, Marfrig Industria e Comercio de Alimentos, Bataguassu, July 16-17, 2008. Slaughter/Processing

10/51. a) Hair was observed on several beef foreshanks in one carcass cooler. b) Heads and tongues of long beef carcasses were being cross-contaminated by contact with a dirty hide puller at the hide removal station. c) Dirty water was dripping from an employee's platform onto beef forequarters at the first carcass washing station. [Regulatory references: 9 CFR 416.13 and 416.17]

13/51. Documentation of corrective actions taken in response to deficiencies identified during pre-operational and operational sanitation did not include some of the required parts of corrective actions. [9 CFR 416.15(b), 416.16(a), and 416.17]

39/51. Open spaces at the junctions of walls and ceilings and exhaust fans between the machinery room and the dry-storage room were not sealed to prevent the entry of insects, rodents, and other vermin. [9 CFR 416.2(a)(b) and 416.17]

40/51. a) There was insufficient light intensity at the beef head washing cabinet to ensure that sanitary conditions were maintained and product was not adulterated. b) There was insufficient of light intensity at the monitoring station for CCP 1 B (absence of visible contamination with feces, ingesta, and milk on beef carcasses) in the slaughter room. [9 CFR 416.2(c) and 416.17]

42/51. One potable water storage tank was found with deteriorated, wet insulation between metal panels and water leaking through the insulation. Open spaces at the junctions of walls and ceilings were also observed. The potable-water storage tank was not adequately maintained to prevent adulteration of the water. [9CFR 416.2(e)(3)and 416.17]

47/51. An employee at the mechanical hide removal station in the slaughter room was observed handling a dirty hide puller chain and, without washing his hands, handling skinned heads. [9 CFR 416.5(a) and 416.17]

51. None of the five DIPOA veterinarians assigned to this newly certified establishment had had training in the principles of HACCP/Pathogen Reduction. [9 CFR 417.7]

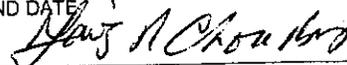
55/51. The masticatory muscles of beef heads were not properly incised and observed during post-mortem inspection. [9 CFR 310]

57/51. Periodic supervisory reviews were routinely conducted by the SIPANG/DIPOA office, but there was no documentation of any findings concerning the aforementioned SSOP and SPS non-compliances or of the fulfillment of HACCP/Pathogen Reduction training requirements for inspection personnel. [9 CFR 416.17 and 417.8]

58. Following a review of the findings by the FSIS auditor, the establishment was issued a Notice of Intent to Delist (NOID) by the Central Competent Authority (CCA). Consequently, the CCA must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

61. NAME OF AUDITOR  
Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE



United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Vale Grande Industria e Comercio de Alimentos Ltda Matupa,	2. AUDIT DATE 06/18/2008	3. ESTABLISHMENT NO. SIF 4490	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP	X	33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	X
14. Developed and implemented a written HACCP plan.	X	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	X
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	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.	X	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.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		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	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58. Notice of Intent to Delist (NOID)	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Establishment SIF 4490, Vale Grande Industria e Comercio de Alimentos, Matupa, Brazil; June 18, 08. Slaughter/Processing

7/51. The written Sanitation Standard Operating Procedures (SSOP) did not specify the frequency with which the establishment would conduct operational sanitation procedures. [Regulatory references: 9 CFR 416.12(d) and 416.17]

10/51. a) Exposed beef carcasses were contacting non food contact surfaces in various areas on the slaughter floor and in the carcass-quarterming room. b) Fat residue and black discoloration from the previous day's operations was observed on food-contact surfaces (posts) in the coolers. e) Broken and deteriorated conveyor belts were observed in the boning room. f) Condensate was dripping from a refrigeration unit onto edible product in the offal cooler. [9 CFR 416.13(b)(c) and 416.17]

13/51. Documentation of corrective actions taken in response to deficiencies identified during pre-operational and operational sanitation inspection did not include procedures to ensure appropriate disposition of product(s) that could be contaminated. [9CFR 416.15(b), 9CFR 416.16(a), and 9CFR 416.17]

14/51. Specified Risk Materials (SRMs) were not included in the hazard analysis to determine the food safety hazards reasonably likely to occur in the production process and identify the preventive measures the establishment could apply to control those hazards. [9 CFR 417.2(a)(1) and 417.8]

18/51. a) The establishment's HACCP plan did not adequately list the monitoring procedures for Critical Limits (CL) at Critical Control Point (CCP) 1B to ensure compliance. [9 CFR 417.2(c)(4) and 417.8]

b) The establishment's HACCP plan did not adequately list the verification procedures for the calibration of process-monitoring instruments, direct observation of monitoring activities, or corrective actions. [9CFR 417.2(c)(7), 417.4(a)(2) and 417.8]

22/51. The establishment personnel did not record the time when corrective actions were taken in response to a deviation from a CL at a CCP 3F (metal detection) occurred on June 16, 2008 or the signature or initials of the person recording them. The establishment employee also did not record the product code(s) or the product name or identity, and the corrective actions taken were not verified. [9CFR 417.5(a)(3) and (b) and 417.17]

39/51 Gaps at both sides of the entrance door to the dry storage room were not sealed properly to prevent the entrance of rodents and other vermin. One corner of the dry storage room had a big opening from the floor to the ceiling. Evidence of rodent presence was observed during the monitoring of the pest control program on March 20, 2008 by an establishment employee. Plant management did not take any preventive measures as required in the written program. [9 CFR 416.2(b) and 416/17]

40/51. There was insufficient light intensity at the beef head washing cabinet to ensure that sanitary conditions were maintained and product was not adulterated. [9 CFR 416.2(c)]

42/51. The potable-water storage tank was observed with loose metal panels on the roof and around the tank window frames. These openings were not sealed properly to prevent the entrance of dust, vermin, and rain water. [9CFR 416.2(e)(3)]

51. a) DIPOA inspection officials did not review and determine the adequacy of corrective actions taken when a deviation from a CL occurred. [9 CFR 417.8(c)]

b) DIPOA inspection officials did not have adequate HACCP/Pathogen Reduction training. [9 CFR 417.7]

c) DIPOA inspection officials had inadequate supervision over the second-shift inspectors. [9 CFR 327.2(a)(2)(i)(B)]

58. Following a review of the findings by the FSIS, the establishment was issued a Notice of Intent to Delist (NOID). Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

61. NAME OF AUDITOR  
Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

*Faizur R. Choudry*

United States Department of Agriculture  
Food Safety and Inspection Service

**Foreign Establishment Audit Checklist**

1. ESTABLISHMENT NAME AND LOCATION Bertin Ltda Mozarlandia, Goias	2. AUDIT DATE 06/19/08	3. ESTABLISHMENT NO. SIF 4507	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements		Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP			33. Scheduled Sample	
8. Records documenting implementation.			34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>			<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.			38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.			39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>			40. Light	
14. Developed and implemented a written HACCP plan.			41. Ventilation	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.			42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.			43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.			44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>			45. Equipment and Utensils	
18. Monitoring of HACCP plan.			46. Sanitary Operations	
19. Verification and validation of HACCP plan.			47. Employee Hygiene	X
20. Corrective action written in HACCP plan.			48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.			<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>			50. Daily Inspection Coverage	
23. Labeling - Product Standards			51. Enforcement	X
24. Labeling - Net Weights			52. Humane Handling	
25. General Labeling			53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/ParK Skins/Moisture)			54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>			55. Post Mortem Inspection	X
27. Written Procedures			<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis			56. European Community Directives	O
29. Records			57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>			58.	
30. Corrective Actions			59.	
31. Reassessment				
32. Written Assurance				

Establishment SIF 4507, Bertin, Mozarlandia, Goias, Brazil; June 19, 2008. Slaughter/Processing

10/51. a) An establishment employee was not removing the spinal card (a Specified Risk Material or SRM) in a sanitary manner to ensure that there was no cross-contamination with edible product: Broken pieces of spinal card were contacting edible parts of the carcass. b) Meat was contacting non-food-contact surfaces (floors and non-food-contact surfaces of containers on the floor) in the boning room. c) Water from a hand-wash facility at the carcass-splitting station on the slaughter floor was dripping onto beef carcasses. d) Exposed carcasses at the leg-skinning stations were contacting an unclean shackle chain. e) Plastic wrapping materials were contacting the floor and other non-food-contact surfaces (posts) in the beef boning room. [Regulatory references: 9CFR 416.13(b)(c) and 9CFR 416.17]

11/51. Establishment officials were not routinely evaluating the adequacy and effectiveness of the Sanitation Standard Operating Procedures (SSOP) to prevent direct product contamination or adulteration. [9 CFR 416.14 and 417]

22/51. a) The records documenting verification and monitoring of Critical Limits (CL) were not initialed or signed by the person performing the monitoring and verification activities.  
b) Some records of actions taken in response to a deviation from a CL were not signed or initialed during the establishment's verification procedures. [9CFR 417.5(a)(3) and (b) and 9CFR 417.8]

39/51. Gaps below and at the sides of doors and windows in the dry storage room for packaging materials were not sealed properly to prevent the entry of vermin. [9 CFR 416.2(a) and 416.17]

41/51. Beaded condensate was observed in the slaughter room under the carcass inspection platform where the fore-legs of carcasses were passing. [9 CFR 416.2(d) and 416.17]

47/51. a) Plastic aprons for slaughter room employees, ready for use after the lunch break were soiled with blood. b) Employees' aprons were contacting the floors and other non-food contact surfaces before they entered the slaughter room. c) The lower part of a plastic door at the entrance to the slaughter room was cross-contaminating employees' boots and clean clothes. d) Establishment employees in the processing room were contacting non-food-contact surfaces with their hands, gloves, and meat hooks and handling edible product without washing their hands or sanitizing the hooks. [9 CFR 416.5(a)(b) and 416.17]

51. Newly-hired DIPOA inspection officials did not have adequate HACCP/Pathogen Reduction training. [9 CFR 417.7]

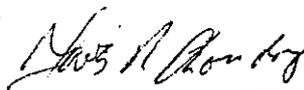
55/51. The masticatory muscles of beef heads were not properly incised and observed during post-mortem inspection. [9CFR 310]

58. Following a review of the findings by the FSIS auditor, the establishment was issued a Notice of Intent to Delist (NOID). Consequently, the Central Competent Authority must conduct an in-depth review within 30 days of the date of the audit, to determine whether corrective actions were taken and, if the corrective actions taken were not effective, to remove the establishment from the list of establishments certified as eligible to export to the United States.

61. NAME OF AUDITOR

Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE





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

Of. 40 12009 IDIPOA

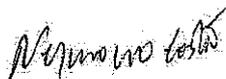
Brasília, 27 de janeiro de 2009

Sr. Conselheiro,

Apraz-me cumprimentá-lo e ao mesmo tempo acusar o recebimento do "REPORT OF AUDIT CARRIED OUT IN BRAZIL COVERING BRAZIL'S MEAT INSPECTION SYSTEM, no período de 11 de junho a 22 de agosto de 2008, pelo FSIS/USDA.

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

Atenciosamente

  
NELMON OLIVEIRA DA COSTA  
DIRETOR DO DIPOA/SDA

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

**Craver, Aurora**

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**From:** Choudry, Faizur  
**Sent:** Thursday, February 05, 2009 8:30 AM  
**To:** Craver, Aurora  
**Subject:** FW: OFICIO 10/2009/DIPOA SCANEADO  
**Attachments:** Doc1.doc

Here is the response for the Brazilian audit report

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**From:** Silva, Joao [mailto:Joao.Silva@fas.usda.gov]  
**Sent:** Wednesday, January 28, 2009 4:40 AM  
**To:** Choudry, Faizur  
**Subject:** FW: OFICIO 10/2009/DIPOA SCANEADO

Dr. Choudry,  
Please find attached the official letter Number 10, dated January 27, 2009 in response to the audit final report of Brazil covering the period of June 11-July 22, 2008.  
Joao

Translation: The first paragraph confirms the receipt of the report, while the second paragraph says that DIPOA has no comments to offer, but would like to emphasize that that all deficiencies found during the audit visit were immediately corrected.

---

**From:** ari.crespim@agricultura.gov.br [mailto:ari.crespim@agricultura.gov.br]  
**Sent:** Tuesday, January 27, 2009 2:12 PM  
**To:** Silva, Joao  
**Subject:** ENC: OFICIO 10/2009/DIPOA SCANEADO

Prezado João,  
Em anexo segue o Oficio

Um abraço

**Ari Crespim dos Anjos**  
**Coordenador Geral de Programas Especiais**  
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