



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

MAR 25 2004

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

Dear Dra. Quirós:

The Food Safety and Inspection Service completed an on-site audit of Costa Rica's meat inspection system. The audit was conducted from September 2 - 11, 2003. A copy of the final report is enclosed.

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

Sincerely,

Sally Stratmoen
Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc: Alan D. Hrapsky, Attaché, US Embassy, San Jose
Laura Dachner, Minister Counselor, Embassy of Costa Rica
Jeanne Bailey, FAS Area Officer
Amy Winton, State Department
Linda Swacina, Deputy Administrator, FSIS
Karen Stuck, Assistant Administrator, OIA, FSIS
Donald Smart, Director, Program Review, OPEER, FSIS
Sally Stratmoen, Director, IES, OIA, FSIS
Clark Danford, Director, IEPS, OIA, FSIS
Mary Stanley, Director, IID, OIA, FSIS
Shannon McMurtrey, IES, OIA, FSIS
Country File

FINAL



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

SEPTEMBER 2, THROUGH SEPTEMBER 11, 2003

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 Ministerio de Agriculturay Ganaderia, Direccion de Salud Animal (MAGDSA) of Costa Rica
MAGDSA	Ministerio de Agriculturay Ganaderia, Direccion de Salud Animal
MAG	Ministerio de Agriculturay
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 Costa Rica from September 2 through September 11, 2003.

An opening meeting was held on September 2, 2003 in San Jose, Costa Rica with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Costa Rica's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA Ministerio de Agriculturay Ganaderia, Direccion de Salud Animal (MAGDSA).

2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the following sites were visited: The headquarters of the CCA located in San Jose, Costa Rica, one laboratory performing analytical testing on United States-destined product, three cattle slaughter establishments, and one meat processing establishment.

Competent Authority Visits			Comments
Competent Authority	Central	1	
Laboratories		1	
Meat Slaughter and Processing Establishments		3	
Meat Processing Establishments		1	

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. The third part involved on-site visits to four establishments: Three slaughter establishments and one processing establishment. The fourth part involved visits to one government laboratory that conducts both microbiology and residue analysis. Lanaseve Laboratory conducts analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*) and *Salmonella* and conducts analyses of field samples for Costa Rica's national residue control program.

Program effectiveness determinations of Costa Rica's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures, (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*. Costa Rica'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 Costa Rica 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 Costa Rica's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Costa Rica. 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 Costa Rica under provisions of the Sanitary/Phytosanitary Agreement. Costa Rica's meat inspection officials are responsible for taking generic *E. coli* samples, and Costa Rica's government laboratories are responsible for sample analysis.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

5. SUMMARY OF PREVIOUS AUDITS

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

The following concerns arose as a result of the FSIS audit of Costa Rica's meat inspection system conducted in July of 2001.

- Condensation was observed in two establishments.
- Hand wash facilities in the locker rooms were not supplied with hot water in three establishments.
- Floor repairs were needed in one establishment.
- Door seals for outside doors were not sufficient in one establishment.

All non-compliances identified during the July 2001 audit were found to be corrected during the July 2002 audit.

The following concerns arose as a result of the FSIS audit of Costa Rica's meat inspection system conducted in July of 2002

- One establishment was issued a Notice of Intent to Delist (NOID) because not all risk areas were addressed in the hazard analysis and the generic *E. coli* program did not cite the person responsible for sampling, nor the sampling location in the establishment.
- The hazard analysis did not address each of the risk areas for each element in one establishment.
- A hose was submerged in a tank of non potable water in one establishment.
- An employee did not wash their hands after handling boxes and equipment prior to handling exposed product in one establishment.
- Two establishments did not establish a responsible person for generic *E. coli* sampling or establish a specific site in the establishment for sampling.
- One establishment did not record generic *E. coli* results on a process control chart.
- One establishment failed to demonstrated proper generic *E. coli* sampling techniques.
- One establishment did not sanitize the dehorner.

All non-compliances identified during the July 2002 audit were found to be corrected during the current audit.

6. MAIN FINDINGS

6.1 Government Oversight

Meat inspection activities are centrally organized at the Central Headquarters located in San Jose, Costa Rica. Implementation of inspection activities is accomplished by the Veterinarian-in-Charge of the official establishment. Verification of implementation is accomplished by monthly supervisory reviews conducted by the Chief of the Meat Inspection Division. The Central Headquarters Office is responsible for legal and regulatory authority for the administration of the meat inspection program. There are no other levels of authority.

In the central headquarters in San Jose, in order to gather more information on oversight, interviews were conducted with the officials responsible for:

- Field operations and inspection services
- SSOP and HACCP programs

- National Residue Program
- Microbiological sample program
- Live animal disease programs
- Export programs and U. S. regulations
- Monthly supervisory visits
- Enforcement and prosecution
- Training

In the local inspection offices interviews were conducted with the Veterinarian-in-Charge responsible for:

- Inspection services
- Enforcement and compliance
- Training

No concerns arose as a result of the interviews except as reported in Section 11.3.

6.1.1 CCA Control Systems

The Chief of the Meat Inspection Division located in the Central Headquarters Office in San Jose, Costa Rica is in charge of export activities for all certified establishments. This official performs the required monthly supervisory reviews to verify establishment compliance with FSIS requirements. The official list of certified establishments is maintained and controlled by the Chief of the Meat Inspection Division. New official inspection guidelines and regulations are issued by the Central Headquarters in San Jose. These are provided by fax, e-mail, and hard copy to the inspection offices of the individual establishments. The Chief of the Meat Inspection Division is responsible for assuring implementation of FSIS requirements by the Veterinarian-in-Charge.

6.1.2 Ultimate Control and Supervision

Control of inspection activities and supervision of non-veterinary inspectors in an establishment is the responsibility of the Veterinarian-in-Charge in both slaughter and processing establishments. The Veterinarians-in-Charge are directly supervised by the Chief of the Meat Inspection Division. The Chief of the Meat Inspection Division is responsible for program delivery and assuring export requirements are implemented in slaughter and processing establishments. Although staffing appeared to be adequate in individual establishments, problems were identified in enforcing FSIS requirements. The CCA did not have ultimate control over the supervision of government inspectors. Identified problems are reported in section 6.1.3 of this report.

6.1.3 Assignment of Competent, Qualified Inspectors

The Central Headquarters ensures adequate training to inspectors before assignment to an official establishment. On the job training is carried out by the Veterinarian-in-Charge in each establishment. Ongoing training is performed by the National Center for Food Technologist located within the University of Costa Rica. The National Center for Food Technologist is responsible for all ongoing training including HACCP training.

Inspection officials receiving formal training must pass a test and can repeat the test if necessary.

Continuous daily inspection was provided for each establishment certified to export beef products to the United States.

The following problems were identified in the assignment of competent, qualified inspectors:

- In four of the four establishments audited, control and supervision of inspectors in certified establishments were inadequate at the local level.
- In four of the four establishments audited, there were FSIS requirements that were not being enforced.
- In two of the four establishments audited, inspection records documenting the implementation of the establishment's compliance with their SSOP did not reflect the true condition of the establishment.

No full-time or part-time government employees are permitted to perform any private, establishment-paid tasks at an establishment in which they perform official duties. There are no provisions for private veterinarians to be hired under contract as part-time government employees. Non-veterinarians are not hired as part-time employees.

Full time employees are hired and receive their basic orientation training by the central office.

6.1.4 Authority and Responsibility to Enforce the Laws, Adequate Administrative and Technical Support

The CCA has the authority and responsibility to enforce U.S. requirements. Each establishment has copies of the pertinent Costa Rica and U.S. rules and regulations.

Export requirements for each establishment certified to export to the United States are verified by the Veterinarian-in-Charge using a basic check list. The checklist included SSOP, HACCP and other FSIS requirements. Verification procedures were documented in three of the four establishments audited.

Problems identified in enforcement of FSIS requirements are reported in Section 13.5 of this report.

Systems are in place for product recalls. The Costa Rica meat inspection system has the legal authority to issue a recall of products. The Agricultural Ministry works with the Ministry of Economics for legal actions against establishments performing illegal activities.

6.1.5 Adequate Administrative and Technical Support

The government of Costa Rica has adequate administrative and technical support in the central office to operate and support its inspection system, including experts, specialists and adequate facilities.

6.2 Headquarters Audit

The auditor conducted a review of inspection system documents at the Central Headquarters Office located in San Jose, Costa Rica. The records review focused primarily on food safety hazards and included the following:

- 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.
- Control of products from livestock with conditions such as Tuberculosis, Cysticercosis, Brucellosis, BSE and of inedible and condemned materials.
- Export product inspection and control including export certificates.

No concerns arose as a result of the examination of these documents.

6.3.1 Audit of Regional and Local Inspection Sites

Costa Rica has no other offices other than the Central Headquarters Office. Results of audits of the inspection offices located in the individual establishments are reported in Section 13 of this report.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of four establishments. Three were slaughter establishments and one was a processing establishment. Two establishments were delisted by Costa Rica. One was delisted for sanitation deficiencies, HACCP deficiencies and ineffective insect controls. One was delisted for HACCP deficiencies and failure to maintain facilities in an acceptable condition. Two establishments received a Notice of Intent to Delist (NOID) the establishment from Costa Rica. One establishment received a NOID for failure to implement their SSOP and HACCP deficiencies. One establishment received a NOID for HACCP deficiencies and for failure to reassess their HACCP plan for *E. coli O157:H7*.

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

Specific deficiencies are noted in the attached individual establishment audit 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. Deficiencies noted in residue laboratory audits are documented in Section 12 of this report.

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. There were no deficiencies noted.

The following laboratory was reviewed:

Lanaseve Laboratory located in San Jose, Costa Rica is a government laboratory that performs microbiology and residue testing for product exported to the United States.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focused on five areas of risk to assess Costa Rica'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 below, Costa Rica'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, and except as noted below, Costa Rica's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States domestic inspection program. The SSOP in the four establishments were found to meet the basic FSIS regulatory requirements.

The following deficiencies regarding SSOP ongoing requirements were noted:

- In one of the four establishments audited, Sanitation Standard Operation Procedures (SSOP) were not effectively implemented.
- In four of the four establishments audited, records documenting implementation, maintenance and effectiveness, and corrective actions of the Sanitation Standard Operation Procedures (SSOP) were incomplete or missing.

9.2 Sanitation

The following sanitation deficiencies were noted (further details may be found in the individual Foreign Establishment Audit Checklists, which are attached to this report):

- In two of the four establishments audited, pest controls were not effective.
- In two of the four establishments audited, construction and maintenance controls were not effective.
- In one of the three establishments audited, fluorescent lights were not adequately covered.
- In the three establishments audited, condensation was identified in product areas.
- In two of the four establishments audited, sanitation controls for equipment and utensils were not effective.
- In one of the three establishments audited, sanitation controls for sanitary operations were not effective.

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 Costa Rica's inspection system had adequate controls in place. No deficiencies were noted

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

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 auditor determined that Costa Rica's inspection system had adequate controls in place in four of the four establishments audited.

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

Deficiencies noted in slaughter/processing controls are documented in Sections 11.2 and 11.3 of this report.

11.1 Humane Handling and Slaughter

Controls for the humane handling and humane slaughter of cattle were in place except as noted in this section:

- In two of the three establishments audited, drinking water was not supplied to all cattle pens.

11.2 HACCP Implementation.

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

The HACCP programs were reviewed during the on-site audits of the four establishments. Four of the four establishments audited had not adequately implemented the HACCP requirements. The following deficiencies regarding the contents of HACCP plans audited were noted:

- In four of the four establishments audited, contents of HACCP plans did not contain all required features.

The following deficiencies regarding HACCP on-going requirements were noted:

- In one of the four establishments audited, one critical control point was not adequately monitored.
- In four of the four establishments audited, verification and/or validation activities were not adequately described in the HACCP plan.
- In one of four establishments audited, preventive measures for corrective actions for a deviation from a critical limit was not included in the HACCP plan.
- In two of the four establishments audited, HACCP plans were not reassessed for *E. coli O157: H7*.

- In three of the four establishments audited, records for documentation of the HACCP plan were not properly completed.

11.3 Testing for Generic *E. coli*

Costa Rica has adopted the FSIS requirements for generic *E. coli* testing with the exception of the following equivalent measure. Costa Rica's meat inspection officials are responsible for taking generic *E. coli* samples, and Costa Rica's government laboratories are responsible for sample analysis. Costa Rica was not following the equivalent measure in the three slaughter establishments audited.

- In three of the three slaughter establishments audited, establishment employees were taking *E. coli* samples.

Three of the four 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 not properly conducted in two of the three slaughter establishments.

- In two establishments, statistical process control procedures had not been developed, as required, to evaluate the results of testing for generic *E. coli*. The two establishments were using excision data criteria in evaluating sponge sampling results.

11.4 Testing for *Listeria monocytogenes*

None of the establishments audited were producing ready-to-eat products for export to the United States. None of the establishments were required to reassess their HACCP plans to include *Listeria monocytogenes* as a hazard reasonably likely to occur.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls.

Costa Rica's National Residue Testing Plan for fiscal year 2003 was being followed and was on schedule. The following deficiency was noted:

- Lanaseve Laboratory was not testing for Arsenic

13. ENFORCEMENT CONTROLS

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

13.1 Daily Inspection in Establishments

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

13.2 Testing for *Salmonella*

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

Three of the four 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 two of the three establishments.

- In one of the three slaughter establishments audited, *Salmonella* samples were not taken at the proper carcass sample sites.

13.3 Species Verification

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

13.4 Monthly Reviews

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

13.5 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between establishments; and prevention of commingling of product intended for export to the United States with product intended for the domestic market. Inspection controls were not effective in all four establishments audited and deficiencies should have been identified by the on-site and supervisory Costa Rica meat inspection officials before this audit. Inspection controls identified as not effective are noted:

- In four of the four establishments audited, FSIS regulatory requirements were not enforced. SSOP and HACCP deficiencies identified in the individual establishment reports were not identified by Costa Rica meat inspection officials in SSOP and HACCP verification activities as non-compliances to be corrected by the establishment.
- In two of the four establishments audited inspection records documenting the implementation of the establishment's compliance with their SSOP did not reflect the true condition of the establishment.

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.

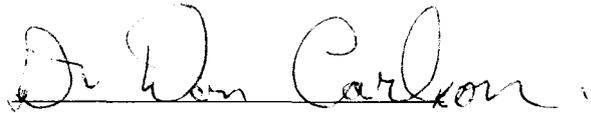
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources

14. CLOSING MEETING

A closing meeting was held on September 11, 2003 in San Jose, Costa Rica with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. Don Carlson
International Audit Staff Officer

A handwritten signature in black ink that reads "Dr. Don Carlson". The signature is written in a cursive style and is positioned to the right of the typed name.

15. ATTACHMENTS

Individual Foreign Establishment Audit Forms

Individual Foreign Laboratory Reports

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

REVIEW DATE
 09/09/03

NAME OF FOREIGN LABORATORY
 Lanaseve Microbiology Laboratory

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 Ministerio de Agricultura Y Ganaderia

CITY & COUNTRY
 San Jose, Costa Rica

ADDRESS OF LABORATORY
 Barreal de Heredia

NAME OF REVIEWER
 Dr. Don Carlson

NAME OF FOREIGN OFFICIAL
 Marietta Urena, Director

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

SIGNATURE OF REVIEWER

DATE

Don Carlson

09/09/03

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE

NAME OF FOREIGN LABORATORY

Comment Sheet

09/09/03

Lanseve Microbiology Laboratory

FOREIGN GOV'T AGENCY

Ministerio de Agricultura Y Ganaderia

CITY & COUNTRY

San Jose, Costa Rica

ADDRESS OF LABORATORY

Barreal de Heredia

NAME OF REVIEWER

Dr. Don Carlson

NAME OF FOREIGN OFFICIAL

Marietta Urena, Director

RESIDUE

ITEM NO.

COMMENTS

Comments:

Lanseve Microbiology Laboratory performs microbiological testing of product destined for export to the United States for generic *E. coli* and *Salmonella sp.*

Lanseve Microbiology Laboratory uses approved AOAC methods but is not ISO 17025 accredited.

REVIEW DATE

NAME OF FOREIGN LABORATORY

09/09/03

Lanaseve Residue Laboratory

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY

Ministerio de Agricultura Y Ganaderia

CITY & COUNTRY

San Jose, Costa Rica

ADDRESS OF LABORATORY

Barreal de Heredia

NAME OF REVIEWER

Dr. Don Carlson

NAME OF FOREIGN OFFICIAL

Marietta Urena, Director

Residue Code/Name			100	200	300	400	500	800	923	950					
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE												
	Sample Handling	01		A	A	A	A	A	A	A	A				
	Sampling Frequency	02		A	A	A	A	A	A	A	A				
	Timely Analyses	03		A	A	A	A	A	A	A	A				
	Compositing Procedure	04		O	O	O	O	O	O	O	O				
	Interpret Comp Data	05		O	O	O	O	O	O	O	O				
	Data Reporting	06	A	A	A	A	A	A	A	A					
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A					
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A					
	Equipment Operation	09	A	A	A	A	A	A	A	A					
	Instrument Printouts	10	A	A	A	A	A	A	A	A					
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A	A	A					
	Recovery Frequency	12	A	A	A	A	A	A	A	A					
	Percent Recovery	13	A	A	A	A	A	A	A	A					
	Check Sample Frequency	14	A	A	A	A	A	A	A	A					
	All analyst w/Check Samples	15	A	A	A	A	A	A	A	A					
	Corrective Actions	16	A	A	A	A	A	A	A	A	A				
	International Check Samples	17	A	A	A	A	A	A	A	A					
REVIEW	Corrected Prior Deficiencies	18	O	O	O	O	O	O	O	O					
OTHER REVIEW		19													
		20													

SIGNATURE OF REVIEWER

Dr. Don Carlson

DATE

09/09/03

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

09/09/03

NAME OF FOREIGN LABORATORY

Lanaseve Residue Laboratory

FOREIGN GOV'T AGENCY

Ministerio de Agricultura Y Ganaderia

CITY & COUNTRY

San Jose, Costa Rica

ADDRESS OF LABORATORY

Barreal de Heredia

NAME OF REVIEWER

Dr. Don Carlson

NAME OF FOREIGN OFFICIAL

Marietta Urena, Director

RESIDUE	ITEM NO.	COMMENTS
401		<p>Arsenic was not analyzed this year</p> <p>Comments:</p> <p>Lanaseve Residue Laboratory performs residue testing for Costa Rica's National Residue Program and for products destined for export to the United States. The laboratory uses AOAC approved methods but is not ISO 17025 accredited.</p>

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Coopemontecillos Montecillos, Alajuela Box 290, Alajuela Costa Rica	2. AUDIT DATE Sept. 3, 2003	3. ESTABLISHMENT NO. 0008	4. NAME OF COUNTRY Costa Rica
5. NAME OF AUDITOR(S) Dr. Don Carlson		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Costa Rica. Est. 0008. September 3, 2003

- 13/51) 1. The establishment did not record any deficiencies for condensation or flies in production areas for the months of July and August. This does not reflect the true condition of the establishment as identified by this audit.
2. Preventive measures for pre-operational and operational sanitation deficiencies were not adequately described in the daily records.
- 15/51) 1. Returned product and rework was not included in the flow chart and was not considered in the hazard analysis.
2. Critical limits were not set appropriately for metal detection.
3. Calibration of the metal detector was not included in the HACCP plan.
- 18) The quality control technician monitoring the CCP for metal detection was not aware the metal detector was not set properly.
- 19/51) 1. Initial validation documentation was missing from the hazard analysis.
2. Validation documentation was missing from the HACCP plan for establishing critical limits.
3. Validation documentation for a deviation from a critical limit was not included in the HACCP.
4. Verification was not adequately described on the monitoring form.
- 21/51) The establishment's two HACCP plans were not reassessed for *E. coli O157:H7* as required.
- 22/51) Preventive measures were not included in the HACCP plan for correctives actions for a deviation from a critical limit.
- 28/51) *E. coli* samples were taken by establishment officials and analyzed by a government laboratory. Costa Rica is approved for an equivalence measure for Costa Rica government officials to take *E. coli* samples.
- 29/51) Statistical process control procedures had not been developed, as required, to evaluate the results of testing for generic *E. coli*. The establishment was using the excision data in evaluating sponge sampling results.
- 38/51) 1. Numerous flies were observed in the slaughter room and the carcass load out room during pre-operational sanitation.
2. Three double doors opening directly to the outside were identified with four inch gaps at the bottom and two to three inch gaps between the double doors. A six foot by eight foot garage door opening to the outside of the carcass load out room was left open during at least six hours of production, resulting in a six by four foot opening to the outside. There was a direct opening connecting the carcass load out room to the hot carcass hall and the slaughter room. Beef carcasses were transferred through the carcass hall to chiller number two during production.
3. Out side entrances into welfare areas and employee entrances into boot and hand washing areas were not protected by solid doors. Strip curtains were used in lieu of doors.
4. Walls in the men's locker room, were covered with dead insects. Cobwebs were identified in a one foot by six foot area of one corner of the locker room.
5. Direct openings to the out side were not protected from flies entering the slaughter room. The main areas identified were the knocking area and the vestibule leading to the slaughter room.
- 39/51) The following deficiencies were observed during pre-operational sanitation: Slaughter room; 1. A window pane opening to the outside, was bowed in two places allowing gaps of three inches by three feet. 2. Overhead structures were rusty. 3. There were many areas of exposed insulation in the overhead of the slaughter room. Welfare facilities; 1. The inside and outside of four lockers used for employee's clothes were covered with rust and peeling paint. 2. The exhaust fan was covered with dust and rust. 3. All the employee locker door handles were covered with a black greasy residue.
- 40/51) 1. Light fixtures and covers were covered with blood, fat residue and dust. 2. The ends of fluorescent light tubes located over PCC #1 inspection area, were not sealed.
- 41) 1. Condensation was observed on the overhead structures above PCC # 1 inspection area, the viscera inspection station, the offal cooler, the pattie room, the entrance of the beef pattie freezer, the boning room and beef carcass chiller number 2.
2. Carcass chiller number 2 was checked two additional times during the audit. Each time condensation was identified over product and dripping onto employee walk ways. Appropriate corrective actions were not initiated by the establishment or by Costa Rica inspection officials.
- 45/51) The following deficiencies were observed during pre-operational sanitation: Slaughter Floor; 1. Rust and dried paint was observed on the dehorner. 2. One scabbard was stored in a hand wash sink. 3. The brisket saw housing was difficult to clean and old product residue was observed on the surface. 4. One stainless steel edible product barrel had a six inch vertical separation located on the top rim and two other stainless steel edible product barrels were cracked and separated half way around the bottom weld. 5. Dried paint was observed on the inside surface of three stainless steel edible barrels. 6. Five plastic inedible barrels were cracked and split on the top and holes, three inch diameter, were located in the bottom of the barrels.
- 46/51) Cutting boards for the head boning table were severely scored with knife cuts and were covered with dark stains.
- 51) 1. Records were not generated by Costa Rican inspection officials to verify establishment compliance with SSOP and HACCP requirements.
2. There were no deficiencies recorded for condensation or flies in production areas for the months of July and August. This does not reflect the true condition of the establishment as identified by this audit.
3. Costa Rican inspection officials were not using the proper sample sites for taking *Salmonella* Performance Standards set samples.
- 52/51) Water was not available to all cattle in the ante-mortem pens.
- 58) The Costa Rica inspection official leading the audit voluntarily removed this establishment from the list of establishments certified as eligible to export to the United States, effective as of the start of operations on the day of this audit. The FSIS auditor was in agreement with this decision.

61. NAME OF AUDITOR

Dr. Don Carlson

62. AUDITOR SIGNATURE AND DATE



United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Procecar, S.A Liberia, Guanacaste Costa Rica	2. AUDIT DATE Sept. 5, 2003	3. ESTABLISHMENT NO. 0010	4. NAME OF COUNTRY Costa Rica
5. NAME OF AUDITOR(S) Dr. Don Carlson		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	X
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	O
14. Developed and implemented a written HACCP plan.		41. Ventilation	O
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	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	O
19. Verification and validation of HACCP plan.	X	47. Employee Hygiene	O
20. Corrective action written in HACCP plan.		48. Condemned Product Control	O
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	O
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	O
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	X	56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58. Delistment	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Costa Rica. Est. 0010. September 5, 2003 Establishment 0010 has temporarily suspended operations do to the availability of cattle. The last production for export to the United States was June 15, 2003 and the last production for the domestic market was July 25, 2003.

- 13/51) Preventive measures for pre-operational and operational sanitation deficiencies were not adequately described in the daily records.
- 15/51) 1. The number of carcass to be monitored was not recorded for CCP-2 in the HACCP plan.
2. The critical limit for temperature stated in the written HACCP plan for CCP-3 was a range and was not measurable.
- 19/51) 1. Initial validation documentation was missing from the hazard analysis.
2. The frequency for verification of records and the observation component was not described in the written HACCP plan for CCP-1.
3. The frequency for verification of the observation component was not described in the written HACCP for CCP-2 and CCP-3.
4. Validation documentation for corrective actions for a deviation from critical limit was not included in the HACCP plan.
5. Validation documentation was missing from the HACCP plan for establishing critical limits.
- 22/51) 1. The frequency for monitoring CCP-3 in the written HCCP plan does not match the frequent recorded in the records documenting the monitoring of CCP-3.
2. Records for the calibration of thermometers were not made available for audit.
3. Preventive measures were not included in the HACCP plan for correctives actions for a deviation from a critical limit.
- 28/51) *E. coli* samples were taken by establishment officials and analyzed by a government laboratory. Costa Rica is approved for an equivalence measure for Costa Rica government officials to take *E. coli* samples.
- 38) Gecko droppings were identified in a corner of a separate build currently used to store packaging material for edible product.
- 39/51) 1. The walls and ceiling in the product freezer were worn, rusty and were in a state of deterioration.
2. Three foot high metal panels used to cover the floor wall junctions in the product freezer were rust, loose and not sealed.
3. One inch holes were sporadic in the freezer walls and numerous one inch holes were identified around the frame work of the freezer doors.
3. Wall panels of the holding cooler were worn and deteriorating. .
4. The floor surface of the holding cooler was cracked and eroded.
5. Exposed insulation and open end pipe coverings were identified in the over head of the slaughter room.
6. Exposed styrofoam insulation and open end pipe coverings were identified in the over head of the offal cooler.
The Costa Rica inspection official leading the audit identified the above findings.
- 51) Zero-tolerance verification by Costa Rica inspection officials was performed in the carcass cooler.
- 58) The Costa Rica inspection official leading the auditor voluntarily removed this establishment from the list of establishments certified as eligible to export to the United States, effective as of the start of operations on the day of this audit. The FSIS auditor was in agreement with this decision.

61. NAME OF AUDITOR

Dr. Don Carlson

62. AUDITOR SIGNATURE AND DATE



Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION El Arco La Riber de Belen Heredia Costa Rica	2. AUDIT DATE Sept. 8, 2003	3. ESTABLISHMENT NO. 0012	4. NAME OF COUNTRY Costa Rica
5. NAME OF AUDITOR(S) Dr. Don Carlson		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.	X	39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.	X	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	X
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	X	56. European Community Directives	O
29. Records	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59. Notice of Intent to Delist	X
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

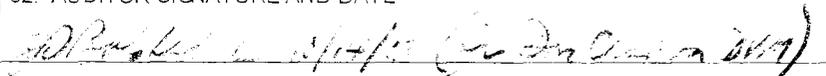
Costa Rica, Est.0012. September 8, 2003

- 10/51) 1. 180° F sanitation water used to sanitize the viscera drop pan and slide was draining onto the evisceration belt.
 2. Water was splashing from a hand wash sink and draining onto the evisceration belt.
 3. Blood was not completely removed from the evisceration belt during the sanitation process.
 4. Condensation was dripping from the overhead of the offal chiller and onto offal product.
 5. Condensation was dripping off of a five foot pipe located over the carcass organic acid spray station.
 Costa Rica inspection officials immediately corrected the above deficiencies.
6. Condensation was not identified or documented in the establishment's pre-operational and operational sanitation inspection records for the months of July and August. This did not reflect the true condition of the establishment.
- 13/51) Preventive measures for pre-operational and operational sanitation deficiencies are not adequately described in the daily records.
- 19/51) 1. Initial validation documentation was missing from the hazard analysis.
 2. On site verification was not described in the HACCP plan.
- 20/51) 1. Preventive measures were not included in the HACCP plan for correctives actions for a deviation from a critical limit.
- 22/51) 2. Preventive measures were not included in the records documenting correctives actions for a deviation from a critical limit.
- 28/51) *E. coli* samples were taken by establishment officials and analyzed by a government laboratory. Costa Rica is approved for an equivalence measure for Costa Rica government officials to take *E. coli* samples.
- 29/51) Statistical process control procedures had not been developed, as required, to evaluate the results of testing for generic *E. coli*. The establishment was using excision data in evaluating sponge sampling results.
- 41) 1. Condensation was identified on the ceiling close to the exit of number three chiller in the boning room.
 2. Condensation was identified under a refrigeration unit between two boning tables in the boning room.
 3. Condensation was identified during pre-operational sanitation under a refrigeration unit over carcasses in chiller number three.
 4. Condensation was observed during pre-operational and operational sanitation of the slaughter room. Condensation was identified on pipes, overhead structures, over employee walk ways and over product conveyor belts.
 5. Condensation was dripping from a refrigeration unit and over head structures in a non product area of chiller number two.
 Costa Rica inspection officials immediately corrected the above deficiencies.
- 45/51) 1. During pre-operational sanitation the edible plastic interlocking product belt on the boning table was identified with broken pieces and holes.
 2. During pre-operational sanitation the plastic interlocking evisceration belt was identified with holes and broken pieces.
 3. During pre-operational sanitation the drip pan protecting the evisceration belt was identified as not completely protecting the evisceration belt from contamination from the work stand.
- 51) Condensation was not identified or documented in Costa Rica's inspection records for pre-operational and operational sanitation for the months of July and August. This did not reflect the true condition of the establishment.
- 52/51) One pen containing 16 head of cattle did not have water available. Three other pens with out cattle did not have water available.
- 59) The Government of Costa Rica meat inspection official leading the audit issued a Notice of Intent to Delist if corrective actions were not in place within 30 days of this audit for failure to implement their SSOPs and for deficiencies in their HACCP plan.

61. NAME OF AUDITOR

Dr. Don Carlson

62. AUDITOR SIGNATURE AND DATE



United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Procesadora de Carnes del Rey Belen - Heredia Costa Rica	2. AUDIT DATE Sept. 4, 2003	3. ESTABLISHMENT NO. 0019	4. NAME OF COUNTRY Costa Rica
5. NAME OF AUDITOR(S) Dr. Don Carlson		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Costa Rica. Est.0019. September 4, 2003

- 13/51) Preventive measures for pre-operational and operational sanitation were not documented in the daily pre-operational and operational sanitation records.
- 15/51) Rework was not included in the flow chart and was not considered in the hazard analysis.
- 19/51) 1. Initial validation documentation was missing from the hazard analysis used to set critical control points.
2. Validation documentation was missing from the HACCP plan for establishing critical limits.
3. Validation documentation was missing from the HACCP plan for corrective actions when a deviation occurred.
4. Five consecutive monitoring records were not verified.
- 21/51) Two HACCP plans were not reassessed for *E. coli O157:H7* as required.
- 22/51) 1. There were no written procedures for calibration of the metal detector.
2. There were no records to document the calibration of the metal detector.
3. Verification procedures were not adequately described on the written records.
- 41) Condensation was observed on a refrigeration drain pipe over a product area and an employee walkway in the beef pattie room.
- 59) The Government of Costa Rica meat inspection official leading the audit issued a Notice of Intent to Delist if corrective actions were not in place within 30 days of this audit for failure to reassess their HACCP plans for *E. coli O157:H7* as required and for deficiencies in their HACCP plan.

61. NAME OF AUDITOR

Dr. Don Carlson

62. AUDITOR SIGNATURE AND DATE



Country Response Not Received