



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

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Dr. Yayo Vicente  
Director, Servicio Nacional de Salud Animal (SENASA)  
Ministerio de Agricultura y Ganaderia (MAG)  
Apartado 3-3006 Cenada  
Heredia  
Costa Rica

Dear Dr. Vicente:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Costa Rica's meat inspection system April 17 through April 28, 2008. Comments received from the government of Costa Rica are 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,

*Don Carlson, acting Director*

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

Enclosure





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

**APRIL 17 THROUGH APRIL 28, 2008**

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



## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

|                   |   |
|-------------------|---|
| AI                | Auxiliary Inspector   |
| BSE               | Bovine Spongiform Encephalopathy  |
| CCA               | Central Competent Authority   |
| CVO               | Chief Veterinary Officer  |
| DIPOA             | <i>Direccion de Inocuidad Productos Origen Animal</i> , Division of Zoo Sanitary Export and Quarantine  |
| <i>E. coli</i>    | Generic <i>Escherichia coli</i>   |
| FSIS              | Food Safety and Inspection Service  |
| LANASEVE          | <i>Laboratorio Nacional de Servicios Veterinarios</i> , National Residue and Microbiology Veterinary Laboratory   |
| MAG               | <i>Ministerio de Agricultura y Ganaderia</i> , Ministry of Agriculture and Livestock  |
| MAGDZE            | <i>Departamento de Servicios Zoonosolarios Internacionales Zoonosolario de Exportacion y Cuarentena Animal</i> , Division of Zoo Sanitary Export and Quarantine |
| NOID              | Notice of Intent to Delist  |
| PBIS              | Performance Based Inspection System   |
| PR/HACCP          | Pathogen Reduction/ Hazard Analysis and Critical Control Point Systems  |
| SENASA            | <i>Servicio Nacional de Salud Animal</i> or National Service of Animal Health   |
| RTE               | Ready-to-Eat  |
| SPS               | Sanitation Performance Standards  |
| SRM               | Specified Risk Material   |
| SSOP              | Sanitation Standard Operating Procedures  |
| <i>Salmonella</i> | <i>Salmonella</i> Species   |
| VIC               | Veterinarian-In-Charge  |







The last two FSIS audits of Costa Rica's inspection system were conducted in October 2005 and February 2007.

The following deficiencies were identified during the audit in October 2005:

- Organic solution sprayed on carcasses was splashing to overhead carcass rails and was dripping back onto the carcasses;
- Establishment's corrective action records did not include preventive measures in its SSOP program;
- Deficiencies were observed with implementation of the pest control program;
- In the locker room, clean aprons were stored on the open shelves and were coming in contact with the employees' backpacks;
- Costa Rica was not following the equivalence measure for generic *E. coli* sample collection allowing government officials to collect the *E. coli* samples for analysis at a government laboratory. The establishment personnel were collecting the *E. coli* sample for analysis at a private laboratory; and
- The residue laboratory was using muscle tissue to analyze for diethylstilbestrol (DES) instead of liver and kidney.

The following deficiency was observed during the audit in February 2007:

- Samples for analysis of organophosphates and DES were sent to the University of San Jose laboratory and to Panama's government laboratory due to the temporary malfunctioning of equipment.

## 6. MAIN FINDINGS

### 6.1 Government Oversight

Meat inspection activities are centrally located in Heredia and are administered by the office of the *Servicio Nacional de Salud Animal* (SENASA) or National Service of Animal Health and its subdivision, *Direccion de Inocuidad Productos Origen Animal* Division of Zoo Sanitary Export and Quarantine (DIPOA). SENASA is under the umbrella of the *Ministerio de Agricultura y Ganaderia*, Ministry of Agriculture and Livestock (MAG). The DIPOA has direct oversight of the local inspection offices. The function of Regional Offices is for animal health only.

The DIPOA is Costa Rica's CCA and is responsible for providing government oversight of Costa Rica's meat inspection programs. The SENASA has direct authority over the National Laboratory of Residue and Micro Analysis in Heredia, the official government laboratory of Costa Rica. This official government laboratory performs chemical and microbiological analytical testing of meat products exported to the U.S. The official guidelines and regulations are issued by the CCA headquarters in Heredia.



All inspection personnel assigned to certified establishments undergo initial and continuing training, as well as participation in practical, on-the-job training under the combined supervision of the CVO and the VIC.

All official veterinarians are qualified veterinarians who have obtained their veterinary degrees from accredited veterinary colleges in Brazil and Costa Rica. Inspectors are required to have a high school diploma with a major in livestock or agriculture.

The government of Costa Rica has competent inspection personnel in both certified establishments.

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

The official inspection personnel are authorized to enforce the government of Costa Rica's meat inspection legislation and U.S. import requirements including: animal health and welfare; control of animal disease; veterinary medicines; and the production of safe foods of animal origin. The CVO of DIPOA and the VIC at each certified establishment have the legal authority to suspend operations and delist certified establishments to prevent the export of unsafe meat to the U.S.

#### 6.1.5 Adequate Administrative and Technical Support

The DIPOA has adequate administrative and technical support to operate Costa Rica's meat inspection system and to ensure its compliance with U.S. requirements. The CCA has the ability to support a third party audit.

#### 6.2 Headquarters Audits

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

- Methods of payment to inspection personnel;
- Proper distribution of relevant legislation to inspection personnel;
- Process of hiring, qualifications and assignment of inspection personnel to the U.S.-certified establishments;
- Internal review reports;
- Other supervisory visits to establishments that were certified to export to the U.S.
- New laws and implementation of documents such as regulations, notices, directives, and guidelines;
- Sampling and laboratory analyses for residues;
- Sampling and laboratory analyses for microbiological samples;
- Humane slaughter of livestock;
- Sanitation, slaughter and processing inspection procedures and standards;
- Control of products from livestock with conditions such as cysticercosis;
- Control of inedible and condemned materials;
- Export product inspection and control including export certificates; and

- Enforcement records, including examples of criminal prosecution and seizure and control of noncompliant product.

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

## 7. ESTABLISHMENT AUDITS

The FSIS auditor visited the two slaughter/processing establishments and one processing establishment that have been certified by SENASA as eligible to export to the U.S. None was delisted or issued a Notice of Intent to Delist (NOID) by Costa Rica because of failure to meet basic U.S. requirements.

## 8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis is placed on the application of procedures and standards that are equivalent to U.S. requirements.

Residue laboratory audits focus on: sample handling; sampling frequency; timely analysis; data reporting; analytical methodologies; tissue matrices; equipment operation and printouts; detection levels; recovery frequency; percent recoveries; intra-laboratory check samples; and quality assurance programs, including standards books and corrective actions.

Microbiology laboratory audits focus on: analyst qualifications; sample receipt; timely analysis; analytical methodologies; analytical controls; recording and reporting of results; and check samples. If private laboratories are used to test U.S. samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP (PR/HACCP) requirements. (Two private laboratories were used in Costa Rica for analyses of generic *E. coli*.)

The following laboratory was audited:

The SENASA *Laboratorio Nacional de Servicios Veterinarios*, (LANASEVE), National Residue and Microbiology Veterinary Laboratory.

The findings in this laboratory will be discussed in Sections 11.3 (Testing for generic *E. coli*), 12 (RESIDUE CONTROLS), and 13.2 (Testing for *Salmonella* species and *E. coli* O157:H7) of this report.

## 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, Costa Rica's inspection system had controls in place for SSOP programs, good personal hygiene practices, and good product handling and storage practices.

## 9.1 Sanitation Standard Operating Procedures

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met according to the criteria employed in the U.S. domestic inspection program.

The following deficiencies were reported:

- During the pre-operational sanitation inspection in the frozen patties processing room, a conveyor belt was observed with several wires missing which made it difficult to clean; and
- During operational sanitation inspection in the boning room, a conveyor belt was observed with several cracks in the contact surface which made it difficult to clean.

## 9.2 Sanitation Performance Standards

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

The following deficiency was reported:

- While condensate was being removed from a rail in the cooler, it was observed that carcasses were not moved from beneath the rail to avoid contamination.

## 10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditors reviewed was Animal Disease Controls. These controls include: ensuring adequate animal identification; 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 reported.

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

## 11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls included the following areas: ante-mortem inspection procedures; ante-mortem disposition; humane handling and humane slaughter of livestock; post-





permitted in U.S.-eligible product. Mechanically-separated beef is ineligible for use in U.S.-eligible product and air-injection stunning is not permitted in Costa Rica.

- In two of the three establishments, the DIPOA was not enforcing some of the U.S. requirements.

#### 14. CLOSING MEETING

A closing meeting was held on April 28 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*  
Oto Urban, DVM  
Senior Program Auditor

*by*  
Don Carlson, DVM







### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION  
EL ARREO  
Lo Ribera, Belen  
Heredia  
Costa Rica

2. AUDIT DATE  
04/21/2008

3. ESTABLISHMENT NO.  
12

4. NAME OF COUNTRY  
Costa Rica

5. NAME OF AUDITOR(S)  
Oto Urban, DVM

6. TYPE OF AUDIT  
 ON-SITE AUDIT  DOCUMENT AUDIT

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

| Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements  | Audit Results | 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              |               |
| <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.          |               | 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                                 | 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. |               | 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. <input type="text"/>                                |               |
| 30. Corrective Actions   |               | 59.   |               |
| 31. Reassessment   |               |   |               |
| 32. Written Assurance  |               |   |               |







