



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

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20250

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Dr. Rui Vargas  
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70043-900 Brasilia DF  
BRAZIL

Dear Dr. Vargas:

The Food Safety and Inspection Service (FSIS) has completed two on-site audits of Brazil's meat inspection system. The audits were conducted from July 11 through August 3, 2001 and from January 9 through February 6, 2002. Enclosed are copies of the two final audit reports. Comments from the Government of Brazil have been included in each report as Attachment G. I sincerely apologize for the delay in providing these final audit reports to you.

I would like to thank you for participating in the February 26, 2002 conference call to discuss the audit results from the January 2002 audit. I appreciate your efforts to address the audit findings, especially the immediate institution of monthly supervisory visits in all certified establishments. In addition, we have reviewed the corrective actions taken by the establishments and the Government of Brazil to respond to the audit findings from both the 2001 and 2002 audits. FSIS has determined that the corrective actions satisfactorily address the audit deficiencies.

If you have any questions regarding these audits or need additional information, please contact me at 202-720-3781. My fax number is 202-690-4040 and my email address is [sally.stratmoen@fsis.usda.gov](mailto:sally.stratmoen@fsis.usda.gov).

Sincerely,

Sally Stratmoen  
Acting Director  
Equivalence Division  
Office of International Affairs

Enclosures

cc:

William Westman, Agricultural Counselor, US Embassy, Brasilia

Colleen Magro, Trade Specialist, Embassy of Brazil

Karen Stuck, Acting Dep. Asst. Administrator, OIA

Robert Hoff, FAS Area Officer

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Sally Stratmoen, Acting Dir., ED, OIA

Amy Winton, State Department

Nancy Goodwin, ED, OIA

Country File (Brazil FY 2001 and 2002 Audits—Finals to CVO)



## **AUDIT REPORT FOR BRAZIL**

### **JANUARY 9 THROUGH FEBRUARY 6, 2002**

#### **INTRODUCTION**

##### **Background**

This report reflects information that was obtained during an audit of Brazil's meat inspection system from January 9 through February 6, 2002. Thirteen of the 29 establishments certified to export meat to the United States were audited. Four of these were beef slaughter and boning establishments; four were beef slaughter, boning, and conducting processing operations; two establishments were conducting processing operations and the other one was producing beef extract and other dairy products.

The last audit of the Brazilian meat inspection system was conducted in July 2001. Nine establishments were audited. The auditor found significant problems in three establishments (SIF 458, SIF 504, and SIF 4507) that were then designated as marginal/re-review. Hazard Analysis and Critical Control Points (HACCP) systems implementation was deficient in eight of the nine establishments visited.

The major concerns from the previous audit were the following.

- ◆ The lack of periodic supervisory reviews of certified establishments.
- ◆ In eight establishments, the final review of all documentation associated with the production of the product prior to shipping was not done. (SIF 76, SIF 385, SIF 421, SIF 458, SIF 504, SIF 2023, SIF 2979, SIF 4507)
- ◆ In seven establishments, the critical limits that were set were not measurable. (SIF 76, SIF 226, SIF 421, SIF 458, SIF 2979, SIF3673, and SIF 4507)
- ◆ In two establishments, the HACCP plan did not adequately address the corrective actions to be followed in response to deviations from critical limits. (SIF 2023 and SIF 4507)
- ◆ In seven establishments, the HACCP plans were not validated to determine if they were functioning as intended. (SIF 421)
- ◆ In one establishment, the HACCP plan's record-keeping system was not adequately documenting the monitoring of CCPs and/or was not including records with actual values and observations. (SIF 7)
- ◆ Convicted felons were not prohibited from owning/operating meat establishment.

During calendar year 2001 (January 1 to November 30), Brazilian establishments exported 77,741,852 pounds of beef products to the United States. Port-of-entry rejections were for

public health (274,477 pounds) – microbiological and unsound conditions (0.35% of total imports), and transportation damage and missing shipping marks (0.03% combined), labeling defects (0.1%), miscellaneous defects (0.34%), and net weight violation (0.09%).

Brazil exports only canned corned beef, canned beef, processed beef (frozen), and cured beef to the United States. Fresh beef and pork may not be imported due to the presence of Hog Cholera, Swine Vesicular Disease, and Foot and Mouth Disease in Brazil.

## PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Brazilian national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits to eight establishments (SIF 42, SIF 421, SIF 736, SIF 2015, SIF 2427, SIF 2979, SIF 3181, and SIF 3673). The third was conducted by on-site visits to 13 establishments (SIF 13, SIF 76, SIF 226, SIF 337, SIF 385, SIF 458, SIF 471, SIF 504, SIF 862, SIF 1651, SIF 2023, SIF 3031, and SIF 4507). The selection of the establishments for these audits was based on the examination of the port of entry (POE) rejection records and randomly. Seven establishments were selected because of their implication in misbranding of canned corned beef. This included four establishments that were involved in recall/market withdrawal of canned corned beef. Three establishments were selected because of concerns arising from the previous on-site audits; one newly approved establishment was substituted for an inactive approved establishment; one previously de-listed canned corned beef processing establishment, which had been re-listed by the GOV during audit was added the itinerary; one establishment was randomly selected. The fourth was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella*.

Brazil's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the generic *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

## RESULTS AND DISCUSSION

### Summary

Thirteen establishments were audited. The auditor found sanitation and other conditions to be so serious in two establishments (SIF 3031 and SIF 4507) that the establishments were delisted by the Government of Brazil (GOB). The auditor found serious problems in the remaining 11 establishments (SIF 13, SIF 76, SIF 226, SIF 337, SIF 385, SIF 458, SIF 471, SIF 504, SIF 862, SIF 1651, and SIF 2023). These 11 establishments were allowed to continue to operate and within 30 days be verified for full compliance by the GOB. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

As stated above, seven major concerns had been identified during the last audit of the Brazilian meat inspection system, conducted in July 2001.

During this new audit, the auditor determined that some of these major concerns had been addressed and corrected by the Ministerio da Agricultura, Pecuaria e Abastecimento (MAPA), Secretaria de Defesa Agropecuaria (SDA), Departamento de Inspecao de Produtos de Origem Animal (DIPOA). However, the following deficiencies identified in the July 2001 audit had not been addressed and corrected:

- ◆ The continuing problems with periodic supervisory reviews of certified establishments. *Repeat deficiency in all the establishments from last audit.*
- ◆ In eight establishments, the final review of all documentation associated with the production of the product prior to shipping was not done. *Repeat deficiency in two establishments from last audit and one establishment was not audited.*
- ◆ In seven establishments, the critical limits that were set were not measurable. *Repeat deficiency in all the establishments from last audit except corrected in one establishment.*
- ◆ In two establishments, the HACCP plan did not adequately address the corrective actions to be followed in response to deviations from critical limits. *Repeat deficiency in one establishment from last audit.*
- ◆ In one establishment, the HACCP plan was not validated to determine that it was functioning as intended. *Repeat deficiency from last audit.*
- ◆ In one establishment, the HACCP plan's record-keeping system was not adequately documenting the monitoring of CCPs and/or was not including records with actual values and observations. *This establishment was not audited.*

- ◆ Convicted felons were not prohibited from owning/operating meat establishment. *No additional information provided by the GOB officials.*

During this new audit, the following deficiencies were found:

1. Instances of actual product contamination and instances of the potential for direct product contamination.
2. Less than monthly supervisory reviews of 11 certified establishments and no monthly supervisory reviews in two establishments.
3. The continuing problems with the implementation and maintenance of SSOP in certified establishments.
4. The continuing problems with implementation and maintenance of HACCP systems in all certified establishments.
5. The exemption requirement from the species verification testing was not met in one establishment.
6. Deficiencies in the approved private laboratories for the testing of *Salmonella* concerning the laboratories' quality assurance programs.
7. Deficiencies in the residue Laboratorio Regional de Apoio Animal (LARA/MG) in Porto Alegre concerning the laboratory's quality assurance programs. In the other residue Laboratorio Regional de Apoio Animal (LARA/MG) in Pedro Leopoldo, mercury testing was not included in the trace element testing program.
8. The lack of inspectional control of devices (brands and including signature verification seals) requiring security and maintenance of inventory records.
9. Inadequate pest control prevention programs.
10. The GOB meat inspectors were reconditioning the dropped meat instead of inspecting and verifying the adequacy and effectiveness of handling and reconditioning of dropped meat in a sanitary manner by the establishment personnel.

Details are provided in the Slaughter/ Processing Controls and Laboratory Audits sections later in this report.

### Entrance Meeting

On January 9, 2002, an entrance meeting was held at the Ministerio da Agricultura, Pecuaria e Abastecimento (MAPA), Secretaria de Defesa Agropecuaria (SDA), Departamento de Inspecao de Produtos de Origem Animal (DIPOA) in Brasilia. The Brazilian government participants were Dr. Marcelo Vieira Mazzini, Chefe da Divisao de Controle do Comercio Internacional (DCI) and Dr. Andreia Garcia de Oliveira Galvao, Medico Veterinario, (DCI). The United States government participants were Ms. Kimberly L. Svec, Agricultural Attaché, American Embassy, Brasilia; Mr. Joao Faustino Silva, Agricultural Specialist, American Embassy, Brasilia; and Dr. Faizur R. Choudry, International Audit Staff Officer, Technical Service Center (TSC), Food Safety and Inspection Service (FSIS).

Topics of discussion included the following:

- ◆ Welcome by Dr. Marcelo Vieira Mazzini, Chefe da Divisao de Controle do Comercio Internacional (DCI), and explanation of the Brazilian meat inspection system.
- ◆ Discussion of the previous audit report.
- ◆ The audit itinerary and travel arrangements.
- ◆ Training programs for veterinary meat inspection officials for pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- ◆ The auditor provided: a) copy of the current Quarterly Regulatory and Enforcement Report; b) FSIS Directive 6420.1, Livestock Post-mortem Inspection Activities-enforcing the zero tolerances for fecal material, ingesta, and milk; c) FSIS Notice, Reassessment of *Listeria Monocytogenes* contamination of Ready-to-Eat Products (RTE); and d) FSIS Notice-12-98, Notification to Establishments of Intended Enforcement Actions.

### Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Brazil's inspection system in July 2001.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the eight establishments listed for records review. This records review was conducted at the headquarters of the inspection service. 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 U.S.
- Training records for inspectors.
- Label approval records such as generic labels.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Export product inspection and control including export certificates.
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding,

suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

The following concerns arose as a result the examination of these documents:

- ◆ In one establishment, the SSOP procedure did not identify the individual responsible for implementing and maintaining the activities.
- ◆ In one establishment, the records for SSOP pre-operational and operational sanitation and any corrective action taken were not being adequately maintained.
- ◆ In three establishments, the flow chart did not describe the process steps and product flow adequately.
- ◆ In seven establishments, the HACCP plan did not adequately conduct a hazard analysis that included food safety hazards likely to occur. *Repeat deficiency in one establishment from last audit.*
- ◆ In four establishments, the HACCP plan did not adequately specify critical limits for each CCP, and the monitoring frequency with which these procedures would be performed. *Repeat deficiency in one establishment from last audit.*
- ◆ In four establishments, the HACCP plan did not adequately address the corrective actions to be followed in response to deviations from critical limits.
- ◆ In seven establishments, the HACCP plans were not validated to determine if they were functioning as intended. *Repeat deficiency in one establishment from last audit.*
- ◆ In seven establishments, the HACCP plans did not adequately state the procedures that the establishment would use to verify that the plan was being effectively implemented and the frequencies with which these procedures would be performed. The on-going verification activities of the HACCP programs were not performed adequately by establishment personnel.
- ◆ In one establishment, the HACCP plan's record-keeping system was not adequately documenting the monitoring of CCPs and/or was not including records with actual values and observations.
- ◆ In six establishments, the final review of all documentation associated with the production of the product prior to shipping was not done. *Repeat deficiency in one establishment from last audit.*
- ◆ In seven establishments, the monthly supervisory visits were not performed. Only two to four internal reviews were conducted per year by the state supervisors. In one establishment, no monthly supervisory visit was performed in a year.

## Government Oversight

All inspection veterinarians and inspectors in establishments certified by Brazil as eligible to export meat products to the United States were full-time DIPOA employees, receiving no remuneration from either industry or establishment personnel.

## Establishment Audits

Twenty-nine establishments were certified to export meat products to the United States at the time this audit was conducted. Thirteen establishments (SIF 13, SIF 76, SIF 226, SIF 337, SIF 385, SIF 458, SIF 471, SIF 504, SIF 862, SIF 1651, SIF 2023, SIF 3031, and SIF 4507) were visited for on-site audits.

Two establishments (SIF 3031 and SIF 4507) were found to be unacceptable because of critical sanitation problems, findings of direct product contamination, and inadequate control of flies in the slaughter room. These establishments were delisted by the GOB. The auditor found serious problems in the remaining 11 establishments (SIF 13, SIF 76, SIF 226, SIF 337, SIF 385, SIF 458, SIF 471, SIF 504, SIF 862, SIF 1651, and SIF 2023). These 11 establishments were allowed to continue to operate and within 30 days be verified for full compliance by the GOB officials.

## Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories; intra-laboratory quality assurance procedures, including sample handling; and methodology.

The Laboratorio Regional de Apoio Animal (LARA) in Pedro Leopoldo was audited on January 16, 2002. Except as noted below, effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done. The check sample program did meet FSIS requirements.

The Laboratorio Regional de Apoio Animal (LARA/MG) in Porto Alegre was audited on January 21, 2002. This is also a reference laboratory for microbiology for the private approved laboratories. Except as noted below, effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done. The check sample program did meet FSIS requirements.

The laboratory has responsibilities in the residue testing program as well as the *E. coli* and *Salmonella* testing programs. This laboratory is providing check samples for *E. coli* and *Salmonella* testing for quality assurance programs to private approved laboratories.

The following was observed:

- ◆ Mercury testing was not included in the trace element testing program in Pedro Leopoldo Laboratory.
- ◆ Standards book for chlorinated hydrocarbons (CHC), polychlorinated biphenyls (PCBs), trace elements (TE), and chloramphenicol was not properly maintained for quality assurance program, such as: solutions prepared by the analyst were not signed and verified by the supervisor before the solutions were used; and pages were not serially numbered in Porto Alegre laboratory.

#### Establishment Operations by Establishment Number

The following operations were being conducted in the 13 establishments:

Beef slaughter and boning – four establishments (SIF 504, SIF 862, SIF 1651, and SIF 4507)

Beef slaughter, boning, canning, and cooked frozen beef – four establishments (SIF 337, SIF 385, SIF 458, and SIF 3031)

Dried beef extract in powder form and dairy products – one establishment (SIF 471)

Cooked frozen and dried beef (Jerky) – one establishment (SIF 13)

Canned corned beef – two establishments (SIF 226 and SIF 2023)

Canned corned beef, meat patties, and sausages – one establishment (SIF 76)

#### SANITATION CONTROLS

Based on the on-site audits of establishments, 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.

#### Sanitation Standard Operating Procedure (SSOP)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs in the 13 establishments were found to meet the basic FSIS regulatory requirements with the following deficiencies:

- ◆ In three establishments, the written SSOP procedure did not address pre-operational sanitation.
- ◆ In one establishment, the written SSOP did not address operational sanitation.
- ◆ In one establishment, the written SSOP pre-operational procedures did not address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
- ◆ In one establishment, the written SSOP procedure did not indicate the frequency of the pre-operational task.
- ◆ In three establishments, the SSOP procedure did not identify the individual responsible for implementing and maintaining the activities.
- ◆ In five establishments, the records for SSOP pre-operational and operational sanitation and any corrective action taken were not being adequately maintained.
- ◆ In three establishments, the daily pre-operational and/or operational sanitation SSOP deficiencies were not identified by the establishment personnel.
- In six establishments, the daily pre-operational and/or operational sanitation deficiencies were not identified and any preventive measures taken were not documented by the GOB inspection officials.
- ◆ In one establishment, the daily pre-operational sanitation was not monitored by the establishment officials to verify the adequacy and effectiveness of the sanitation SSOPs since July 2001.

Cross-Contamination: Actual product contamination and the potential for product contamination was found in all thirteen establishments audited. In some establishments, but not all, GOB officials took appropriate corrective actions. Specific findings for each establishment audited on-site can be found in Attachment F.

Examples of findings of actual product contamination include:

- ◆ In four establishments, dripping condensate from overhead exhaust tube pipe, refrigeration units, rails, beams, pipes, ducts, and ceilings, that were not cleaned/sanitized daily, was falling onto cooked ground beef, beef carcasses, packaged edible product, plastic tubes for cooked and frozen beef and containers for edible product, employees' scabbards and aprons in the coolers, offal room, at the entrance to corridor from the slaughter room, raw canned corned beef storage room, cooking room, raw cooked and frozen room, and employees' equipment and aprons cleaning room. Establishment officials retained the product, stopped the operation and took corrective action. In one of these establishments, neither establishment nor GOB inspection officials took corrective actions. In another establishment, the

corrective actions were inadequate and ineffective. *Repeat deficiency in one establishment from last audit.*

- ◆ In two establishments, the sanitizer was not maintained at the required temperature (82°C) at the de-horning station in the slaughter room and in the raw cooked and frozen room. In these two establishments, the sanitizing facility for knives was designed in such a way that it was not possible to sanitize knives completely and effectively. *Corrected immediately.*
- ◆ In one establishment, de-horning equipment was not sanitized between use on each carcass in the slaughter room. *Corrected immediately.*
- ◆ In one establishment, the automatic viscera conveyor was observed with blood, fat, pieces of meat, and hair after washing/sanitizing in the slaughter room. *Establishment officials took corrective action immediately.*
- ◆ In four establishments, exposed edible product was contacting platforms and employees' boots, dirty frame of conveyor, dirty racks and a dirty hose at the carcass splitting saw, in the boning room, slaughter room, carcass trimming station, cooking room and offal freezer. *Establishment officials ordered correction.*
- ◆ In two establishments, insanitary equipment was directly contacting edible product in the boning room, meat grinding room, and offal freezer. For example, employees' scabbards and racks for edible offal were found with dirt, fat, black discoloration, dried blood, and pieces of meat; working tables were observed with rolling edges and seams at the junctions of tables that were not sealed completely, and one conveyor belt for edible product was worn and deteriorated. *Establishment officials took corrective action temporarily and proposed permanent preventive measures to GOB officials.*
- ◆ In three establishments, water was dripping from employees' working platform onto exposed forefeet of carcasses, employees' clothes and equipment, automatic viscera conveyor after washing/sanitizing at the eviscerating platform, and hindquarter-skinning platform. *Establishment officials took corrective action temporarily and proposed permanent preventive measures to GOB officials.*

Examples of findings of potential cross-contamination of product include:

- ◆ In one establishment, overhead pipes in the surge room were observed with accumulation of dirt and product residue. *Establishment officials ordered correction.*
- ◆ In one establishment, several doors between boning and processing rooms had plastic strip curtains in direct contact with the floor that had a potential to contaminate employees' garments and edible product when passing through the doors. *Establishment officials corrected immediately.*

- ◆ In two establishments, gaps at the bottoms of all windows and numerous holes in screen windows in the potable water storage tank were not sealed properly to prevent the entrance of rainwater, dust, and other vermin. In one of these establishments, dust, ants, and a few vermin were observed inside the potable water storage tank. *In one establishment, officials took appropriate corrective action immediately and in the other establishment, officials ordered correction.*
- ◆ In one establishment, a hand-washing facility was too close to carcasses, creating the potential for splash contamination from dirty water during washing hands at the head removal station. In the same establishment, water was overflowing from the sanitizer onto the floor, creating the potential for dirty water splashing onto beef heads and employees' garments.

Personal Hygiene and Practices: In the area of personal hygiene and practices, the following deficiencies were noted:

- ◆ In two establishments, employees were not observing good hygienic work habits to prevent direct product contamination such as: the unclean electrical cable of an employee's wizzard knife was contacting the skinned leg area of a carcass; another employee was observed handling edible product while wearing dirty mesh gloves which were kept in the sink during washing hands and were not sanitized; also the mesh gloves were not covered with rubber gloves to prevent cross contamination at the head separation station in the slaughter room. In another establishment, an employee was observed picking up pieces of meat from the floor and, without washing his hands, handling edible product in the meat cooking room. Two employee were observed unwrapping frozen meat and allowing the dirty outside of wrapping material to contact the table and exposed meat in the meat grinding and cooking room. *Establishment officials took corrective action immediately.*
- ◆ In one establishment, receptacles for waste paper were not foot-operated at the hand washing stations. *Establishment officials ordered correction.*

Product Handling and Storage: In the area of product handling and storage, the following deficiencies were noted.

- ◆ In one establishment, numerous carcasses were observed with rail dust in the carcass cooler and, in same establishment, one hind quarter out of four was observed with hair, rail dust, dirt, and grease after pre-boning trim in the boning room. *Establishment officials took corrected action immediately.*
- ◆ In 10 establishments, product that contacted the floor (dropped meat) was not being reconditioned by the establishment personnel. The GOB meat inspectors were reconditioning the dropped meat instead of inspecting and verifying the adequacy and effectiveness of handling and reconditioning of dropped meat in a sanitary manner by

the establishment personnel. In one of these establishments, there was no facility to wash and sanitize the table after reconditioning dropped meat in the boning room.

- ◆ In 12 establishments, pest control prevention was inadequate. For example, in one establishment, the dry storage room for packaging materials had numerous holes through the walls and at the junction of walls and ceilings to the outside. The packaging material was not stored on racks that were high enough and away from walls to monitor pest control and sanitation programs and dust, dirt, cobwebs, and dead insects were observed in the room. Cartons were being stored directly on the floor. In the same establishment, in the can storage room, numerous holes were observed through the walls and at the junction of walls and ceilings to the outside and gaps at the bottoms and sides of four doors were not sealed properly to prevent the entry of rodents and other vermin. Dust, dirt, cobwebs, and dead insects were observed. Evidence of rodent infestation was observed on October 2, 2001 and in December 2001, in the employees' restaurant and incubation room by the outside pest control company, during their routine monitoring program. Rodenticides were replaced in the bait boxes but no other effort was made to take corrective/preventive measures either by the pest control company or establishment personnel/GOB meat inspection officials. In another establishment, the dry storage room for packaging materials was observed with dripping condensation on a wall, insects and also the packaging material was not stored on racks that were high enough and away from walls to monitor pest control and sanitation programs. Numerous holes at the junction of walls and ceilings to outside and gaps at the sides of the door in the dry storage room were not sealed properly to prevent the entrance of rodents and other vermin. Dead insects were observed in this room.

In six establishments, flies were observed in the slaughter and canning rooms. In seven establishments, doors in the dry storage room, slaughter room, boning room, shipping room, can storage and labeling rooms, processing room, edible product storage room, offal room, inedible room were not sealed properly to prevent the entry of rodents and other vermin. In another establishment, the dry storage room for packaging materials was divided into two rooms and one belongs to another company. The middle wall between these two rooms was partially completed and numerous holes at the junction of walls and ceilings to the outside were not sealed properly to prevent the entrance of rodents and other vermin. *In all the establishments officials ordered correction.*

Establishment Facilities: In the area of maintenance of establishment facilities, the following deficiencies were noted:

- ◆ In five establishments, light at the carcass, viscera, head, and retained carcass postmortem inspection stations and beef head washing cabinet was inadequate. *Establishment officials ordered correction.*

- ◆ In one establishment, flaking paint was observed on walls in one freezer and broken coving in numerous places in another freezer. *Establishment officials ordered correction.*

### ANIMAL DISEASE CONTROLS

Brazil's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

### RESIDUE CONTROLS

Brazil's National Residue Testing Plan for 2002 was being followed, and was on schedule. The Brazilian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals

### SLAUGHTER/PROCESSING CONTROLS

The fourth of the five risk areas that the auditor looks at is Slaughter/Processing Controls. The controls include the following areas: adequate animal identification; ante-mortem inspection procedures; ante-mortem disposition; humane slaughter; post-mortem inspection procedures; post-mortem dispositions; 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 a generic *E. coli* testing program in slaughter establishments. Deficiencies are discussed below.

#### HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a HACCP system. Each of these systems was evaluated according to the criteria employed in the U.S domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were reviewed during the on-site audits of twelve establishments. The auditors found the following deviations from FSIS' regulatory requirements:

- In nine establishments, the HACCP plan flow chart did not adequately describe the process steps and product flow.

- In 10 establishments, the HACCP plan did not adequately conduct a hazard analysis.
- In 11 establishments, the HACCP plan did not adequately specify critical limits for each CCP and the frequency with which these procedures would be performed. *Repeat deficiency in four establishments from last audit.*
- In nine establishments, the HACCP plan did not adequately address the corrective actions to be followed in response to deviations from critical limits. *Repeat deficiency in one establishment from last audit.*
- In 12 establishments, the HACCP plan was not validated to determine if it was functioning as intended.
- In 11 establishments, the HACCP plan did not adequately state the procedures that the establishment would use to verify that the plan was being effectively implemented and the frequencies with which these procedures would be performed. The on-going verification activities of the HACCP program were not adequately performed by the establishment personnel. *Repeat deficiency in one establishment from last audit*
- In eight establishments, the HACCP plan's record keeping system was not adequately documenting the monitoring of CCPs.
- In all 13 establishments, the on-going verification activities of the HACCP program were not adequately performed by the GOB meat inspection officials.
- In three establishments, the final review of all documentation associated with the
- production of the product prior to shipping was not done. *Repeat deficiency in one establishment from last audit.*

All the establishments producing canned corned beef (SIF 76, SIF 226, SIF 337, SIF 385, SIF 458, SIF 2023, and SIF 3031) were visited for on-site audits. This included the four establishments that were involved in recall/market withdrawal of canned corned beef. The GOB meat inspection system and each establishment demonstrated control over the identification and segregation of the products during the production process. During this audit, no unapproved and unidentified raw product was observed. The implementation of a new identification system of raw product from receiving to shipping was in compliance. In addition, establishments were not using cheek meat, head meat, and hearts in canned corned beef.

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

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

Eight out of the 13 establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the

criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The following deficiency was noted:

- In one establishment, the procedure did not designate the employee(s) responsible for collecting the samples.

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements

Additionally, establishments had adequate controls in place to prevent meat products intended for Brazilian domestic consumption from being commingled with products eligible for export to the U.S.

## ENFORCEMENT CONTROLS

### Inspection System Controls

Except as noted below, the GOB inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, the importation of only eligible livestock from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for shipment security, and products entering the establishments from outside sources.

### Testing for *Salmonella* Species

Eight out of the 13 establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

### Equivalence Determination

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

1. SAMPLE COLLECTOR: Establishment takes samples.

- Brazil has a clearly written sampling plan with instructions for sample collection and processing that will be universally followed. The plan is outlined in a document titled "Circular 271/97/DCI/DIPOA"
- Brazil has a means of ensuring that establishment sample collection activities are appropriate and laboratory performance is acceptable. Samples are taken under the direct supervision of a government inspector. Private laboratories are authorized by the government of Brazil. Laboratories are audited twice a year by the government. Check samples are provided several times a year to check the continuing effectiveness of the laboratory results. Test results are provided directly to the government inspector at the establishment.
- Brazil uses the test results to monitor establishment performance over time.
- Brazil takes immediate action any time an establishment fails to meet a *Salmonella* performance standard

## 2. LABORATORIES: Private Laboratories

- Private laboratories are authorized by the government. Laboratories are subjected to a thorough review before authorization is granted. Laboratories are audited twice a year by the government. Check samples are provided several times a year to check the continuing effectiveness of the laboratory results.
- The laboratory has properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities. Test results are provided directly to the local inspection service.

## 3. ENFORCEMENT STRATEGY.

- Brazil suspends an establishment from export to the U.S. the first time an establishment fails to meet a *Salmonella* performance standard.
- In addition to corrective actions, the establishment reassesses its HACCP plan and a second set of samples is collected. If the establishment fails to meet the performance standard on the second sample set, then the HACCP plan is audited by the Brazilian inspection service and another sample set is collected.
- If the establishment fails to meet the performance standard on the third sample set, then the establishment is suspended from domestic production. The establishment cannot be re-certified for export until it can meet the performance standard.

The following deficiencies were noted:

- Laboratories were not audited twice a year by the government.
- Check samples were not provided several times a year to check the continuing effectiveness of the laboratory results. Check samples were provided only two times a year.

## Species Verification Testing

At the time of this audit, Brazil was exempt from the species verification-testing requirement, having advised FSIS in writing that the following five conditions were being met:

1. Carcasses and products are transported between establishments in devices which are sealed with a tamper-detectable inspection seal by the Inspection Service at the originating establishment and broken by the Inspection Service at the receiving establishment.
2. Brands and sealing devices used by the Inspection Service to identify and seal product are kept under Inspection Service security.
3. Establishments are under continuous Inspection Service supervision while operating. No operations may take place without Inspection Service supervision.
4. Only one species of livestock or meat is allowed in the slaughter or processing areas at one time.
5. Product must be exported to the United States in a cargo container sealed by the Inspection Service.

During the audit, the auditor verified that these conditions continued to be met except in one establishment.

- More than one species of meat is allowed in the processing areas at one time such as beef, pork, and poultry (SIF 76).

## Monthly Reviews

These monthly reviews were being performed, as required in all 13 establishments; in 11 establishments, one to six internal reviews were conducted per year by the Brazilian equivalent to Circuit Supervisors while in two other establishments, no monthly supervisory visits had been performed. All officials were veterinarians with many years of experience. Dr. Marcello Mazzini, Chief of DCI/DIPOA was in charge of the slaughter and processing establishments.

The internal review program was applied equally to both export and non-export establishments. Internal review visits were not always announced in advance and were conducted, at times by individuals and at other times by a team of reviewers. For U.S. certified establishments, these reviews were not on a monthly basis. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central DIPOA offices in Brasilia.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, a team is empowered to conduct an in-depth review, and the results are reported to Dr. Marcello Mazzini, Chief of DCI/DIPOA for evaluation; they formulate a plan for corrective actions and preventive measures.

## Enforcement Activities

- In six establishments, inspection devices (brands) were not adequately kept under inspectional control and the inventory of inspection devices (brands) was not maintained properly by the GOB inspection officials.

## Exit Meetings

An exit meeting was conducted at the Ministerio da Agricultura, Pecuaria e Abastecimento (MAPA), Secretaria de Defesa Agropecuaria (SDA), Departamento de Inspecao de Produtos de Origem Animal (DIPOA) in Brasilia, on February 6, 2002. The Brazilian government participants were Dr. Rui Eduardo Saldanha Vargas, Director do DIPOA; Dr. Carlos Eduardo Tedesco Silva, Assessora Tecnica da DCI/DIPOA; Dr. Milene Cristine Ce, Assessora Tecnica da DCI/DIPOA; and Dr. Andreia Garcia de Oliveira Galvao, Assessora Tecnica da DCI/DIPOA. The United States government participants were Ms. Kimberly L. Svec, Agricultural Attaché, American Embassy, Brasilia; Mr. Joao Faustino Silva, Agricultural Specialist, American Embassy, Brasilia; and Dr. Faizur R. Choudry, International Audit Staff Officer, Technical Service Center (TSC), Food Safety and Inspection Service (FSIS).

The auditor explained to the GOB inspection officials that this audit is only a sample of activities and therefore is subject to the risks associated with sampling. Therefore, the possibility exists that the auditor did not observe all problems during the audit. The basis of the audit was against FSIS requirements and equivalence determinations such as: Pathogen Reduction/HACCP final rule including regulations on SSOP, *E. coli* testing and *Salmonella* performance standards.

The following deficiencies were found during this audit:

1. Instances of actual product contamination and instances of the potential for direct product contamination.
2. Less than monthly supervisory reviews of 11 certified establishments and no monthly supervisory reviews in two establishments.
3. Continuing problems with the implementation and maintenance of SSOP in certified establishments.
4. Continuing problems with implementation and maintenance of HACCP systems in all certified establishments.
5. The exemption requirement from the species verification testing was not met in one establishment.
6. Deficiencies in the approved private laboratories for the testing of *Salmonella* concerning the laboratories' quality assurance programs.
7. Deficiencies in the residue Laboratorio Regional de Apoio Animal (LARA/MG) in Porto Alegre concerning the laboratory's quality assurance programs. In the other residue Laboratorio Regional de Apoio Animal (LARA/MG) in Pedro Leopoldo, mercury testing was not included in the trace element testing program.

8. Lack of inspectional control of devices (brands and including signature verification seals) requiring security and maintenance of inventory records.
9. Inadequate pest control prevention programs.
10. The GOB meat inspectors were reconditioning the dropped meat instead of inspecting and verifying the adequacy and effectiveness of handling and reconditioning of dropped meat in a sanitary manner by the establishment personnel.

Dr. Rui Eduardo Saldanha Vargas, Director do DIPOA, stated that he would take the necessary steps to ensure that corrective actions and preventive measures would be implemented, including HACCP, SSOP, and sanitation problems.

### CONCLUSION

The Brazilian meat inspection system has major deficiencies, which demonstrate a lack of government oversight as evidenced by the findings presented in the report. However, a few improvements were observed in the individual establishments' HACCP and SSOP programs.

Thirteen establishments were audited. The auditor found sanitation and other conditions to be so serious in two establishments that the establishments were delisted by the GOB. The auditor found significant problems in the remaining 11 establishments. The deficiencies encountered during the on-site establishment audits, in some establishments, were adequately addressed to the auditor's satisfaction. The GOB meat inspection officials stated that they would ensure prompt compliance.

Dr. Faizur R. Choudry  
International Audit Staff Officer

(signed)Dr. Faizur R. Choudry

## ATTACHMENTS

- A. Data collection instrument for SSOPs
- B. Data collection instrument for HACCP programs
- C. Data collection instrument for *E. coli* testing.
- D. Data collection instrument for *Salmonella* testing
- E. Laboratory Audit Forms
- F. Individual Foreign Establishment Audit Forms
- G. Written Foreign Country's Response to the Draft Final Audit Report

### Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1. Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. identified	7. Documentation done daily	8. Dated and signed
SIF13	√	√	√	√	√	√	√	√
SIF76	√	√	√	√	√	√	no	√
SIF226	√	√	√	√	√	√	√	√
SIF337	√	√	√	√	√	no	no	√
SIF385	√	√	√	√	√	√	√	√
SIF458	√	√	√	√	√	√	no	√
SIF471	√	no	no	√	√	no	no	√
SIF504	√	√	√	√	√	√	√	√
SIF862	√	no	√	√	√	√	√	√
SIF1651	√	√	√	no	√	no	√	√
SIF2023	√	√	√	√	√	√	no	√
SIF3031	√	√	√	√	√	√	√	√
SIF4507	√	√	√	√	no	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

SIF42	√	√	√	√	√	√	√	√
SIF421	√	√	√	√	√	no	no	√
SIF736	√	√	√	√	√	√	√	√
SIF2015	√	√	√	√	√	√	√	√
SIF2427	√	√	√	√	√	√	√	√
SIF2979	√	√	√	√	√	√	√	√
SIF3181	√	√	√	√	√	√	√	√
SIF3673	√	√	√	√	√	√	√	√

### Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. review
13	√	no	√	√	√	no	√	√	no	√	√	√
76	no	no	√	√	√	no	no	no	no	√	√	√
226	no	no	√	√	√	no	no	no	no	no	√	√
337	√	no	√	√	√	no	√	no	no	no	√	√
385	no	no	√	√	√	√	no	no	no	no	√	no
458	no	no	√	√	√	no	no	no	no	no	√	√
471	no	no	√	√	√	no	no	no	no	√	√	√
504	no	√	√	√	√	√	√	no	√	no	√	√
862	no	no	√	√	√	no	no	no	no	no	√	√
1651	no	no	√	√	√	no	no	no	no	no	√	no
2023	√	√	√	√	√	no	√	no	√	√	√	√
3031	no	√	√	√	√	no	no	no	no	no	√	no
4507	√	no	√	√	√	no	no	no	no	√	√	√

No = Establishment met FSIS basic regulatory requirements of HACCP programs. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implementation.

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corrections are described	8. Plan validated	9. Adequate verification procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. review
42	no	no	√	√	√	no	no	no	no	√	√	no
421	no	no	√	√	√	no	no	no	no	√	√	no
736	√	no	√	√	√	no	no	no	no	√	√	no
2015	√	no	√	√	√	√	√	no	no	no	√	no
2427	cold	storage										
2979	no	no	√	√	√	√	√	no	no	√	√	no
3181	√	no	√	√	√	√	√	no	no	√	√	no
3673	√	no	√	√	√	no	no	no	no	no	√	no

No = Establishment met FSIS basic regulatory requirements of HACCP programs. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implementation.

### Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 13, 76, 226, 471, and 2023, which were processing establishments) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli*.
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1. Written procedure	2. Sampler designated	3. Sampling location given	4. Predominant Species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
13	cooked	frozen	beef							
76	canned	corned	beef							
226	canned	corned	beef							
337	√	√	√	√	√	√	√	√	√	√
385	√	√	√	√	√	√	√	√	√	√
458	√	√	√	√	√	√	√	√	√	√
471	Beef	extract								
504	√	√	√	√	√	√	√	√	√	√
862	√	no	√	√	√	√	√	√	√	√
1651	√	√	√	√	√	√	√	√	√	√
2023	canned	corned	beef							
3031	√	√	√	√	√	√	√	√	√	√
4507	√	√	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

Est. #	1. Written procedure	2. Sampler designated	3. Sampling location given	4. Predominant species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
42	√	√	√	√	√	√	√	√	√	√
421	√	√	√	√	√	√	√	√	√	√
736	canned	corned	beef							
2015	cooked	frozen	beef							
2427	Cold	Store								
2979	√	√	√	√	√	√	√	√	√	√
3181	√	√	√	√	√	√	√	√	√	√
3673	Cured	beef								

### Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. *Salmonella* testing is being done in this establishment.
2. Carcasses are being sampled.
3. Ground product is being sampled.
4. The samples are being taken randomly.
5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.
6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	1. Testing as required	2. Carcasses are sampled	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
SIF13	Cooked	& frozen				
SIF76	Canned	corned beef				
SIF226	Canned	corned	beef			
SIF337	√	√	N/A	√	√	√
SIF385	Canned	Corned beef	& cooked	frozen beef		√
SIF458	Canned	Corned beef	& cooked	frozen beef		
SIF471	√	√	N/A	√	√	√
SIF504	√	√	N/A	√	√	√
SIF862	√	√	N/A	√	√	√
SIF1651	√	√	N/A	√	√	√
SIF2023	Canned	corned beef				
SIF3031	√	√	N/A	√	√	√
SIF4507	√	√	N/A	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

Est. #	<i>1. Testing as required</i>	<i>2. Carcasses are sampled</i>	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
SIF42	√	√	√	√	√	√
SIF421	√	√	√	√	√	√
SIF736	Canned	Corned	beef			
SIF2015	Cooked	& frozen	beef			
SIF2427	Cold storage					
SIF2979	√	√	√	√	√	√
SIF3181	√	√	√	√	√	√
SIF3673	Cured beef					

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

REVIEW DATE  
 01/21/02

NAME OF FOREIGN LABORATORY  
 Laboratorio Regional de Apoio Animal (LARA/MG)

**FOREIGN COUNTRY LABORATORY REVIEW**

FOREIGN GOV'T AGENCY  
 Ministerio da Agricultura, Pecuaria e  
 Abastecimento

CITY & COUNTRY  
 Porto Alegre, BRAZIL

ADDRESS OF LABORATORY  
 Porto Alegre, Rio Grande do Sul

NAME OF REVIEWER  
 Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
 Dr. Rui Vargas, Director, DCI/DIPOA, Dr. Carlos Silva, & Dr. Marco Santos

Residue Code/Name			100	111	200	203	400	800	E.co	Sal				
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	O	A	A	O	A	O				
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	O	A	A	O	A	O				
	Recovery Frequency	12	A	A	O	A	A	O	A	O				
	Percent Recovery	13	A	A	O	A	A	O	A	O				
	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				
	International Check Samples	17	A	A	A	A	A	A	A	A				
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	O	O	O	O	O	O	O	O				
OTHER REVIEW		19												
		20												

SIGNATURE OF REVIEWER

DATE

**FOREIGN COUNTRY LABORATORY REVIEW**

*(Comment Sheet)*

REVIEW DATE

01/21/02

NAME OF FOREIGN LABORATORY

Laboratorio Regional de Apoio Animal (LARA/MG)

FOREIGN GOV'T AGENCY  
Ministerio da Agricultura, Pecuaria e  
Abastecimento

CITY & COUNTRY  
Porto Alegre, BRAZIL

ADDRESS OF LABORATORY  
Porto Alegre, Rio Grande do Sul

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Rui Vargas, Director, DCI/DIPOA, Dr. Carlos Silva, & Dr. Marco Santos

RESIDUE	ITEM	COMMENTS
100,111, 400,203	09	Standards book for chlorinated hydrocarbons (CHC), polychlorinated biphenyls (PCBs), trace elements (TE), and chloramphenicol was not properly maintained for quality assurance program such as: when solutions prepared by the analyst were not signed and verified by the supervisor before the solutions were used; and page: were not serially numbered.

**FOREIGN COUNTRY LABORATORY REVIEW**

FOREIGN GOV'T AGENCY Ministerio da Agricultura, Pecuaria e Abastecimento	CITY & COUNTRY Pedro Leopoldo, BRAZIL	ADDRESS OF LABORATORY Av. Romulo Joviano s/n
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NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Tomaz de Aquino Porftrio, Chefe do LARA & Dr. Marcelo Mazzini, DCI-DIPOA
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Residue Code/Name			200	203	400	500	800	923								
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE													
	Sample Handling	01		A	A	A	A	A	A							
	Sampling Frequency	02		A	A	A	A	A	A							
	Timely Analyses	03		A	A	A	A	A	A							
	Compositing Procedure	04		O	O	O	O	O	O							
	Interpret Comp Data	05		O	O	O	O	O	O							
	Data Reporting	06	A	A	A	A	A	A								
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A	A	A	A	A							
	Correct Tissue(s)	08		A	A	A	A	A	A							
	Equipment Operation	09		A	A	A	A	A	A							
	Instrument Printouts	10		A	A	A	A	A	A							
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	A	A	A	A	A	A							
	Recovery Frequency	12		A	A	A	A	A	A							
	Percent Recovery	13		A	A	A	A	A	A							
	Check Sample Frequency	14		A	A	A	A	A	A							
	All analyst w/Check Samples	15		A	A	A	A	A	A							
	Corrective Actions	16		A	A	A	A	A	A							
	International Check Samples	17	O	O	O	O	O	O								
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE	O	O	O	O	O	O							
OTHER REVIEW		19	EVAL. CODE													
		20														

SIGNATURE OF REVIEWER

DATE

**FOREIGN COUNTRY LABORATORY REVIEW***(Comment Sheet)*

REVIEW DATE

01/16/02

NAME OF FOREIGN LABORATORY

Laboratorio Regional de Apoio Animal LARA/MG

FOREIGN GOV'T AGENCY

Ministerio da Agricultura, Pecuaria e  
Abastecimento

CITY &amp; COUNTRY

Pedro Leopoldo, BRAZIL

ADDRESS OF LABORATORY

Av. Romulo Joviano s/n

NAME OF REVIEWER

Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL

Dr. Tomaz de Aquino Porftrio, Chefe do LARA &amp; Dr. Marcello Mazzini, DCI-DIPOA

RESIDUE	ITEM	COMMENTS
402		Mercury was not included in the testing program in this laboratory.

FOREIGN PLANT REVIEW FORM

01/31/02

Est. 2023  
Bertin Ltda

COUNTRY  
BRAZIL

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Carlos Eduardo Tedesco Silva

EVALUATION  
 Acceptable     Acceptable/  
Re-review     Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable    M = Marginally Acceptable    U = Unacceptable    N = Not Reviewed    O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 M	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 M	Processing equipment	62 A
Pest --no evidence	07 M	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 A
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 A
Inspector work space	13 O	Humane Slaughter	40 O	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 O	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 U	Returned and rework product	45 A	Inspector verification	73 M
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 O	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 C
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 /
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 O	Imports	81 /
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82 M
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	01/31/02	Est. 2023 Bertin Ltda	Corporanga COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Carlos Eduardo Tedesco Silva		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptat

COMMENTS:

07. Gaps at the bottoms of door in the can storage and labeling rooms were not sealed properly to prevent the entry of rodents and other vermin. Establishment officials took corrective action immediately.
17. Dripping condensate, from overhead exhaust tube pipe that was not cleaned/sanitized daily, was falling onto cooked ground beef in cooking room. Establishment officials retained the product, stop the operation and corrected condensation problem.
31. Product that contacted the floor (drop meat) was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.
34. The daily pre-operational sanitation deficiencies were not identified in the documentation by the GOB inspection officials. GOB inspection officials ordered correction immediately.
73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials
76. Periodic supervisory visits were not performed monthly. Only four internal reviews were conducted per year by the local/state officials.
82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implimentation such as specificies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP; and 8) HACCP plan was not validated to determine if it was functioning as intended.

01/23/02

Est. 1651  
Frigorifico Extremo Sul S/A

CITY  
Capao do Leao

COUNTRY  
BRAZIL

FOREIGN PLANT REVIEW FORM

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Rui Vargas, Director & Dr. Tedesco Silva

EVALUATION  
 Acceptable     Acceptable/ Re-review     Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable    M = Marginally Acceptable    U = Unacceptable    N = Not Reviewed    O = Does not apply

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(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 M	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	05 M	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 U	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 N	Inspector verification	73 M
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 M
Dry storage areas	21 M	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82 U
Personal hygiene practices	26 A	Ingredients identification	53 O		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	01/23/02	Est. 1651 Frigorifico Extremo Sul S/A	Capão do Leão COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Rui Vargas, Director & Dr. Tedesco Silva		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unaccepta

COMMENTS:

05. a) Sanitizer was not maintained at the required temperature (82C) at the de-horning station. Establishment officials took correctiv action immediately.
- b) The sanitizing facility for knives at the sticking area was designed in a way that it was not possible to sanitize knives completely an effectively. Establishment officials ordered correction immediately.
07. A few flies were observed in the slaughter room. Establishment officials indicated that they would take corrective and preventive measures immediately.
21. Gaps at the bottoms of door in the dry storage room were not sealed properly to prevent the entry of rodents and other vermin. Establishment officials ordered correction.
31. Product that contacted the floor (drop meat) was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.
73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials
76. Periodic supervisory visits were not performed monthly. Only six four internal reviews were conducted per year by the local/stat officials.
82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implimentation such as 1) flow chart that describes the process steps and product flow; 2) conduct a hazard analysis; 6) specifies critical limits for each CCP, monitoring procedures, and frequency; 7) corrective actions and preventive measures to be followed in response to deviations from critical limits; 8) HACCP plan was not validated to determine if it was functioning as intended; 9) establishment ongoing verification procedures, and the frequency with which these procedures would be performed to verify that the plan was being effectively implimented; 10) recordkeeping system that documents the monitoring of th CCPs and/or includes records with actual values and observations; 12) and the final review of all documentation associated with the production of the product prior to shipping was not done.

**FOREIGN PLANT REVIEW FORM**

REVIEW DATE

02/04/02

ESTABLISHMENT NO. AND NAME

Est. 3031  
Frigorifico Quatro Marcos Ltda

CITY

Sao Jose dos Quatro

COUNTRY  
BRAZIL

NAME OF REVIEWER  
Dr. Faiz R. Cloudry

NAME OF FOREIGN OFFICIAL  
Dr. Tedesco Silva & Dr. Andria Galvao

EVALUATION  
 Acceptable     Acceptable/ Re-review     Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable    M = Marginally Acceptable    U = Unacceptable    N = Not Reviewed    O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 U	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 M	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 M	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 A
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 M	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 U	Operational sanitation	35 M	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 A
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 A
Lighting	11 M	Antemortem inspec. procedures	38 A	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 U	Returned and rework product	45 A	Inspector verification	73 M
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 M	Residue program compliance	46 A	Single standard	76 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 M
Dry storage areas	21 M	Residue reporting procedures	48 A	Control of security items	77 U
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 C
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 I
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 /
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82 M
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

<b>FOREIGN PLANT REVIEW FORM</b> (reverse)	02/04/02	Est. 3031 Frigorifico Quatro Marcos Ltda	Sao Jose dos Quatro COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Tedesco Silva & Dr. Andria Galvao		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input checked="" type="checkbox"/> Unacceptabl

**COMMENTS:**

05. The sanitizer was not maintained at the required temperature (82C) in the raw product room for cooked and frozen beef and the sanitizing facility for knives was designed in such a way that it was not possible to sanitize knife completely and effectively.
07. 21 . a) Numerous flies were observed in the slaughter room and canned corned beef processing room. Neither establishment nor GOB inspection officials took corrective actions. b) Gaps at the bottoms and sides of door in the slaughter room, boning room, canning room, shipping room, and dry storage room were not sealed properly to prevent the entry of rodents and other vermin.
11. Inadequate light was observed at the head and viscera postmortem inspection stations. Establishment officials ordered correction.
17. a) Dripping condensate, from overhead refrigeration units, rails, and ceilings that was not cleaned/sanitized daily, was falling onto beef carcasses in two coolers. There was no product at the time of audit in one cooler. b) Dripping condensate, from overhead pipes, ducts, and beams that was not cleaned/sanitized daily, was falling onto beef carcasses at the entrance to corridor from the slaughter room. An employee was observed removing condensate, and standing on the beam with dirty boots over the carcass rail. c) Dripping condensate, from ceilings that was not cleaned/sanitized daily, was falling in the raw canned corned beef storage room. d) Dripping condensate, from overhead working platform that was not cleaned/sanitized daily, was falling onto plastic tubes for cooked and frozen beef and container for edible product in the raw cooked and frozen room. e) Dripping condensate, from ceilings that was not cleaned/sanitized daily, was falling onto employees' scabbards and aprons in the employees' cleaning room. Establishment corrective actions were inadequate and ineffective.
19. 30. a) Racks for offals were found with accumulation of dirt, dried blood, pieces of meat and edible product was contacting these racks from broken packages in the offal freezer. b) One conveyor belt for edible product was worn out and deteriorated in the boning room. Establishment officials ordered correction.
28. a) Beef carcass was contacting dirty hose at the carcass splitting station. b) Water was dripping from employees' working platform onto exposed forefeet of carcasses at the first eviscerating station. c) Water was dripping from employees' working platform onto employees' clothes and equipment underneath at the hindquarter skinning station. d) Hand washing facility was too close to carcass, potential for splash contamination from dirty water during washing hands at the head removal station. e) Water was overflowing from automatic head hook conveyor sanitizer onto floor, potential for dirty water splash from floor onto beef heads and employees' clothes.
31. Product that contacted the floor (drop meat) was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.
35. The daily operational sanitation monitoring records of establishment and GOB inspection officials did not reflect the actual sanitary conditions observed in the establishment.
73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials
76. The monthly supervisory reviews were not conducted. Only two supervisory audit was performed.
77. Inspection devices (brands) were not kept adequately under inspectional control and the inventory of inspection devices (brands) were not maintained properly by the inspection officials.
80. Because of gross product contamination, inadequate pest control program, and lack of compliance of daily operational sanitation programs and procedures, and inadequate inspectional controls, the status of this establishment is not equivalent to that required in the U.S. programs. All the above deficiencies were discussed with Dr.C. Tedesco & Dr. Andria Galvao, DIPOA, and they agreed to remove Establishment SIF 3031 from the list of establishments eligible to export meat and meat products to the United States, effective February 5, 2002.
82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implimentation such as 1) flow chart that describes the process steps and product flow; 2) conduct a hazard analysis; 7) corrective actions and preventive measures to be followed in response to deviations from critical limits; 8) HACCP plan was not validated to determine if it was functioning as intended; 9) establishment ongoing verification procedures, and the frequency with which these procedures would be performed to verify that the plan was being effectively implimented; 10) recordkeeping system that documents the monitoring of the CCPs and/or includes records with actual values and observations; 12) and the final review of all documentation associated with the production of the product prior to shipping was not done.

**FOREIGN PLANT REVIEW FORM**

REVIEW DATE: 01/15/02  
ESTABLISHMENT NO. AND NAME: Est. 4507 Bertin Ltda

CITY: Mozarlandia (Goiás)  
COUNTRY: BRAZIL

NAME OF REVIEWER: Dr. Faizur R. Choudry  
NAME OF FOREIGN OFFICIAL: Dr. Marcelo mazzini & Dr. Andria Galvao  
EVALUATION:  Acceptable  Acceptable/ Re-review  Unacceptable

CODES (Give an appropriate code for each review item listed below)  
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention		28	Formulations	55
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29	Packaging materials	56
Water potability records	01 A	Product handling and storage		30	Laboratory confirmation	57
Chlorination procedures	02 A	Product reconditioning		31	Label approvals	58
Back siphonage prevention	03 A	Product transportation		32	Special label claims	59
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring	60
Sanitizers	05 A	Effective maintenance program		33	Processing schedules	61
Establishments separation	06 A	Preoperational sanitation		34	Processing equipment	62
Pest --no evidence	07 U	Operational sanitation		35	Processing records	63
Pest control program	08 A	Waste disposal		36	Empty can inspection	64
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures	65
Temperature control	10 A	Animal identification		37	Container closure exam	66
Lighting	11 M	Antemortem inspec. procedures		38	Interim container handling	67
Operations work space	12 A	Antemortem dispositions		39	Post-processing handling	68
Inspector work space	13 A	Humane Slaughter		40	Incubation procedures	69
Ventilation	14 A	Postmortem inspec. procedures		41	Process. defect actions -- plant	70
Facilities approval	15 A	Postmortem dispositions		42	Processing control -- inspection	71
Equipment approval	16 A	Condemned product control		43	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44	Export product identification	72
Over-product ceilings	17 U	Returned and rework product		45	Inspector verification	73
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates	74
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Other product areas (inside)	20 A	Sampling procedures		47	Inspection supervision	76
Dry storage areas	21 U	Residue reporting procedures		48	Control of security items	77
Antemortem facilities	22 A	Approval of chemicals, etc.		49	Shipment security	78
Welfare facilities	23 A	Storage and use of chemicals		50	Species verification	79
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status	80
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51	Imports	81
Personal dress and habits	25 A	Boneless meat reinspection		52	HACCP	82
Personal hygiene practices	26 M	Ingredients identification		53		
Sanitary dressing procedures	27 A	Control of restricted ingredients		54		

FOREIGN PLANT REVIEW FORM (reverse)	01/15/02	Est. 4507 Bertin Ltda	Mozarlandia (Goias)
NAME OF REVIEWER Dr. Faizur R. Choudry			COUNTRY BRAZIL
NAME OF FOREIGN OFFICIAL Dr. Marcelo mazzini & Dr. Andria Galvao		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input checked="" type="checkbox"/> Unacceptab	

COMMENTS:

07. Numerous flies were observed in the slaughter room. Neither establishment nor GOB inspection officials took corrective actions.
11. Inadequate light was observed at the viscera inspection and retained carcass inspection stations. Establishment officials ordered correction.
17. Dripping condensate, from overhead refrigeration units, rails, beams, and ceilings that was not cleaned/sanitized daily, was falling onto beef carcasses in four coolers. Neither establishment nor GOI meat inspection officials took corrective actions. This is a repeat deficiency from last audit.
- 07, 21. a) Dripping condensation on a wall and dead insects was observed in the dry storage room.
- b) The packaging material was not stored on racks that were high enough and away from walls to monitor pest control and sanitation programs.
- c) Numerous holes at the junction of walls and ceilings to outside and gaps at the sides of door in the dry storage room were not sealed properly to prevent the entrance of rodents and other vermin. Establishment officials proposed corrective/preventive measures to GOB inspection officials.
26. Employees were not observing good hygienic work habits to prevent direct product contamination such as: an employee during skinning of hind leg permitted unclean electrical cable of wizzard knife to come in contact with skinned area of leg; another employee was observed using dirty mesh gloves which were kept in the sink during washing hands and without sanitizing his gloves, handled edible product and also mesh gloves were not covered with rubber gloves to prevent cross contamination at the head separation station in the slaughter room. Establishment officials took corrective action immediately.
28. Water drain was clogged at the automatic carcass washing station potential for splash contamination from dirty floor water. Establishment officials took corrective action immediately.
31. Product that contacted the floor (drop meat) was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.
- 34, 35.a) The daily pre-operational and operational sanitation deficiencies were not identified and any preventive measures taken were not documented by the GOB inspection officials.
- b) The establishment officials did not take corrective and preventive measures for the identified operational sanitation deficiencies.
73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials
76. The monthly supervisory reviews were not conducted. Only one supervisory audit was performed from January 2001 to January 15, 2002.
77. a) Inspection devices (brands) were not kept adequately under inspectional control and inventory of inspection devices (brands) was not maintained properly by the GOB inspection officials. Inspection officiale indicated that it would be rectified immediately.
80. Because of gross product contamination, inadequate pest control program, and lack of compliance of daily operational sanitation programs and procedures, inadequate inspectional controls, and noncompliance with HACCP applicable regulatory requirements for implimentation, the status of this establishment is not equivalent to that required in the U.S.programs. All the above deficiencies were discussed with Dr.Marcelo mazzini and Dr.Andria Galvao, Veterinarians, DIPOA, and they agreed to remove Establishment SIF 4507 from the list of establishments eligible to export meat and meat products to the United States, effective January 15, 2002.
82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implimentation such as 2) conduct a hazard analysis; 6) specify critical limits for each CCP and the frequency with which these procedures would be performed; 7) corrective actions and preventive measures to be followed in response to deviations from critical limits; 8) HACCP plan was not validated to determine if it was functioning as intended; 9) establishment ongoing verification procedures, and the frequency with which these procedures would be performed to verify that the plan was being effectively implimented.

**FOREIGN PLANT REVIEW FORM**

01/18/02

Est. 13  
Ferreira International Ltda

COUNTRY  
BRAZIL

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Marcelo Vieira Mazzini, DCI-DIPOA

EVALUATION  
 Acceptable     Acceptable/  
Re-review     Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable    M = Marginally Acceptable    .U = Unacceptable    N = Not Reviewed    O = Does not apply

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(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
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Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
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Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
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Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 O	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 O	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 N	Inspector verification	73 M
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 O	Inspection supervision	76 M
Dry storage areas	21 M	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 C
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 /
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 O	Imports	81 /
Personal dress and habits	25 A	Boneless meat reinspection	52 O	HACCP	82 M
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	01/18/02	Est. 13 Ferreira International Ltda	Tres Rios (R.D. J) COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Marcelo Vieira Mazzini, DCI-DIPOA		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptab

COMMENTS:

7. 21. A large dry storage room was divided into two rooms and one belongs to other company. The middle wall between these rooms was partially completed and numerous holes at the junction of walls and ceilings to outside were not sealed properly to prevent the entrance of rodents and other vermin. Establishment officials proposed corrective/preventive measures to GOB inspection officials.

31. Product that contacted the floor (drop meat) was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.

73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials

76. No monthly supervisory visits were performed. Establishment SIF 13 was approved to export meat and meat products to the United States, effective October 24, 2001.

82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implimentation such as 2) conduct a hazard analysis; 6) specifies critical limits for each CCP, monitoring procedures, and frequency; 9) establishment ongoing verification procedures, and the frequency with which these procedures would be performed to verify that the plan was being effectively implimented.

NOTE: The HACCP plan was not validated because it did not complete 90 days as required for initial validation.

**FOREIGN PLANT REVIEW FORM**

REVIEW DATE ESTABLISHMENT NO. AND NAME

01/30/2002

Est. 76  
B. F. Produtos Alimenticios Ltda

CITY  
Barretos

COUNTRY  
BRAZIL

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Carlos Eduardo Tedesco Silva

EVALUATION  
 Acceptable     Acceptable/ Re-review     Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable    M = Marginally Acceptable    U = Unacceptable    N = Not Reviewed    O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 M	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 M	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 M	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 M	Processing equipment	62 A
Pest --no evidence	07 U	Operational sanitation	35 M	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 A
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 A
Inspector work space	13 O	Humane Slaughter	40 O	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 O	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 N	Inspector verification	73 M
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 M	Residue program compliance	46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 O	Inspection supervision	76 M
Dry storage areas	21 U	Residue reporting procedures	48 O	Control of security items	77 M
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 U
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82 U
Personal hygiene practices	26 M	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

<b>FOREIGN PLANT REVIEW FORM</b> (reverse)	01/30/2002	Est. 76 B. F. Produtos Alimenticios Ltda	Barretos COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Carlos Eduardo Tedesco Silva		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptabl

**COMMENTS:**

07. Numerous holes through the walls and at the junction of walls and ceilings to outside and gaps at the bottoms and sides of four doors in the can storage room were not sealed properly to prevent the entry of rodents and other vermin. Dust, dirt, cobwebs, and dead insects were observed. Evidence of rodent infestation was observed on October 2, 2001, and December, 2001, in the employees' restaurant and incubation rooms by the out side Pest Control Company, during their routinely monitoring program. Rodenticide was replaced in the bait boxes but no other effort was made to take corrective/preventive measures either by the pest control company/establishment personnel/GOB meat inspection officials.
19. a) Employees' scabbards were observed with dirt, fat, and black discoloration in the boning room. Establishment officials took corrective action immediately.
- b) Working tables were observed with rolling edges and seams at the junctions of tables were not sealed completely in the meat grinding room. Establishment officials ordered correction immediately.
21. There were no doors and windows and numerous holes through the walls and at the junction of walls and ceilings to outside in the dry storage room. The packaging material was not stored on racks that were high enough and away from walls to monitor pest control and sanitation programs and dust, dirt, cobwebs, and dead insects were observed in the room and cartons were stored directly on the floor. Establishment officials ordered corrective actions and preventive measures immediately.
26. Several employees were not observing good hygienic work habits to prevent direct product contamination such as: an employee was observed picking up pieces of meat from the floor and, without washing his hands, handled edible product in the meat cooking room. Two employee were observed, during unwrapping frozen meat, the dirty outside of wrapping material was contacting the table and exposed meat in the meat grinding and cooking room. Establishment officials corrected immediately.
28. Several doors between boning and processing rooms had plastic strip curtains in direct contact with the floor, potential to contaminate employees' garments and edible product when passing through the doors. Establishment officials corrected immediately.
30. Meat was contacting dirty frame of lift during transfer into hopper in the cooking room. Establishment officials ordered correction immediately.
31. Product that contacted the floor (drop meat) was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.
- 34, 35. The daily pre-operational and operational sanitation deficiencies were not identified by the GOB inspection officials.
73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials
76. The monthly supervisory reviews were not conducted. Only four supervisory audit was performed yearly.
79. Brazil is exempted from the species verification testing requirement but in Establishment 76, the conditions were not met such as more than one species of meat (beef, pork, and poultry) was allowed in the processing areas at one time.
77. Inspection devices (brands) were not kept adequately under inspectional control and the inventory of inspection devices (brands) were not maintained properly by the inspection officials.
82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implimentation such as 1) flow chart that describes the process steps and product flow; 2) conduct a hazard analysis; 6) specify critical limits for each CCP and the frequency with which these procedures would be performed 7) corrective actions and preventive measures to be followed in response to deviations from critical limits; 8) HACCP plan was not validated to determine if it was functioning as intended; 9) establishment ongoing verification procedures, and the frequency with which these procedures would be performed to verify that the plan was being effectively implimented.

FOREIGN PLANT REVIEW FORM

NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Rui Vargas & Dr. Carlos E. Tedesco Silva	EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable
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CODES (Give an appropriate code for each review item listed below)

A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 U	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 A
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 A
Inspector work space	13 O	Humane Slaughter	40 O	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 O	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 N	Inspector verification	73 M
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 O	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 O	HACCP	82 U
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	01/22/02	Est. 226 BE-Comercio e Industria, Importacao e Exportacao Ltda	Hullha Negra COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Rui Vargas & Dr. Carlos E. Tedesco Silva		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptabl

COMMENTS:

31. Product that contacted the floor (drop meat) was not reconditioned in a sanitary manner before being added to the edible product and there was no facility to sanitize table after reconditioning drop meat in the boning room. Drop meat was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.

73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials

76. Periodic supervisory visits were not performed monthly. Only six internal reviews were conducted per year by the local/state officials.

82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implimentation such as 1) flow chart that describes the process steps and product flow; 2) conduct a hazard analysis; 6) specifies critical limits for each CCP, monitoring procedures, and frequency; 7) corrective actions and preventive measures to be followed in response to deviations from critical limits; 8) HACCP plan was not validated to determine if it was functioning as intended; 9) establishment ongoing verification procedures, and the frequency with which these procedures would be performed to verify that the plan was being effectively implimented; 10) recordkeeping system that documents the monitoring of the CCPs and/or includes records with actual values and observations. GOB meat inspector was responsible for reconditioning drop meat instead of verifying the adequacy and effectiveness of handling and trimming of contaminated product in a sanitary manner.

**FOREIGN PLANT REVIEW FORM**

REVIEW DATE  
02/01/02

ESTABLISHMENT NO. AND NAME  
Est. 337  
Bertin Ltda

CITY  
Lins  
COUNTRY  
BRAZIL

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Carlos Eduardo Tedesco Silva

EVALUATION  
 Acceptable     Acceptable/  
Re-review     Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable    M = Marginally Acceptable    U = Unacceptable    N = Not Reviewed    O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 M	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 M	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 M	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 A
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 A
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 M
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 M
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 C
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 /
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 /
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82 M
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	02/01/02	Est. 337 Bertin Ltda	Lins COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Carlos Eduardo Tedesco Silva		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

28. Hindquarter of beef carcasses were contacting employees' platform in the boning room. Establishment officials took corrective action immediately and preventive measures were proposed to GOB inspection officials.
29. Dehorning equipment was not sanitized between use on each carcass in the slaughter room. Establishment officials took corrective action immediately.
31. Product that contacted the floor (drop meat) was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.
73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials
76. Periodic supervisory visits were not performed monthly. Only six internal reviews were conducted per year by the local/state officials.
77. Inspection devices (brands) were not kept adequately under inspectional control and the inventory of inspection devices (brands) were not maintained properly by the inspection officials.
82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implementation such as 2) conduct a hazard analysis; 6) specifies critical limits for each CCP, monitoring procedures, and frequency; 8) HACCP plan was not validated to determine if it was functioning as intended; 9) establishment ongoing verification procedures, and the frequency with which these procedures would be performed to verify that the plan was being effectively implemented; 10) recordkeeping system that documents the monitoring of the CCPs and/or includes records with actual values and observations.

FOREIGN PLANT REVIEW FORM

01/25/02

Est. 385  
Friboi Ltda

COUNTRY  
BRAZIL

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Carlos Tedesco Silva, DCI/DIPOA

EVALUATION  
 Acceptable     Acceptable/ Re-review     Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable    M = Marginally Acceptable    U = Unacceptable    N = Not Reviewed    O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 M	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 M	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
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Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 M
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
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Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 M	Imports	81 C
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82 U
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 M	Control of restricted ingredients	54 A		

<b>FOREIGN PLANT REVIEW FORM</b> (reverse)	01/25/02	Est. 385 Friboi Ltda	Andradina COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Carlos Tedesco Silva, DCI/DIPOA		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptab

COMMENTS:

07. Gaps at the bottoms of door in the slaughter, boning, labeling, and can storage rooms were not sealed properly to prevent the entry of rodents and other vermin. A few flies were observed in the slaughter room. Establishment officials indicated that they would take corrective and preventive measures immediately.

11. Light at the carcass, viscera, and head inspection stations was 200 lux (light requirement is 540lux). Establishment officials ordered corrections.

20. Flaking paint was observed on walls in the freezer #11 and broken coving in numerous places in the freezer #1. Establishment officials ordered corrections.

27. Numerous carcasses were observed with rail dust in the carcass cooler. Establishment officials ordered correction immediately.

28.a) Fore feet of beef carcasses were contacting platform and employees' boots at the fore feet skinning and final carcass trimming stations. Establishment officials ordered corrections.

b) Dripping dirty water, from overhead eviscerating platform was falling onto automatic viscera conveyor after washing/sanitizing in the slaughter room. Establishment officials took corrective action temporarily and proposed permanent preventive measures to GOB officials.

31. Product that contacted the floor (drop meat) was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.

34, 35.a) The daily pre-operational and operational sanitation deficiencies were not identified by the establishment personnel. Establishment officials ordered corrections.

b) The daily pre-operational and operational sanitation deficiencies were not identified by the GOB inspection officials.

51. One hind quarter out of four was observed with hair, rail dust, dirt, and grease after pre-boning trim in the boning room. Establishment officials took appropriate corrective action immediately.

73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials

76. Periodic supervisory visits were not performed monthly. Only four internal reviews were conducted per year by the local/state officials.

82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implementation such as 1) flow chart that describes the process steps and product flow; 2) conduct a hazard analysis; 7) corrective actions and preventive measures to be followed in response to deviations from critical limits; 8) HACCP plan was not validated to determine if it was functioning as intended; 9) establishment ongoing verification procedures, and the frequency with which these procedures would be performed to verify that the plan was being effectively implemented; 10) recordkeeping system that documents the monitoring of the CCPs and/or includes records with actual values and observations; 12) and the final review of all documentation associated with the production of the product prior to shipping was not done..

**FOREIGN PLANT REVIEW FORM**

REVIEW DATE  
01/24/02

ESTABLISHMENT NO. AND NAME

Est. 458  
B. F. Produtos Alimenticios Ltda

CITY  
Presidente Epitacio

COUNTRY  
BRAZIL

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Carlos Tedesco Silva, DCI/DIPOA

EVALUATION  
 Acceptable     Acceptable/ Re-review     Unacceptable

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Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 C
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 C
Personal dress and habits	25 A	Boneless meat reinspection	52 A	HACCP	82 U
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	01/24/02	Est. 458 B. F. Produtos Alimenticios Ltda	Presidente Epitacio COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Carlos Tedesco Silva, DCI/DIPOA		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptabl

COMMENTS:

01. Gaps at the bottoms of all windows and holes in screens windows in the potable water storage tank were not sealed properly to prevent the entrance of rainwater, dust, and other vermin. Dust, ants, and a few vermin were observed inside the potable water storage tank. Establishment officials took appropriate corrective action immediately.
07. Gaps at the bottoms of door in the boning, canning and labeling rooms were not sealed properly to prevent the entry of rodents and other vermin. A few flies were observed in the slaughter room. Establishment officials indicated that they would take corrective and preventive measures immediately.
11. Light at the beef head washing cabinet was inadequate. Establishment officials took corrective action immediately.
21. Gaps at the bottoms of door in the dry storage room were not sealed properly to prevent the entry of rodents and other vermin. Establishment officials ordered correction.
28. Automatic viscera conveyor was observed with blood, fat, pieces of meat, and hair after washing/sanitizing in the slaughter room. Establishment officials took corrective action immediately.
31. Product that contacted the floor (drop meat) was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.
73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials
76. Periodic supervisory visits were not performed monthly. Only five internal reviews were conducted per year by the local/state officials.
82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implimentation such as 1) flow chart that describes the process steps and product flow; 2) conduct a hazard analysis; 6) specifies critical limits for each CCP, monitoring procedures, and frequency; 7) corrective actions and preventive measures to be followed in response to deviations from critical limits; 8) HACCP plan was not validated to determine if it was functioning as intended; 9) establishment ongoing verification procedures, and the frequency with which these procedures would be performed to verify that the plan was being effectively implimented; 10) recordkeeping system that documents the monitoring of the CCPs and/or includes records with actual values and observations.

FOREIGN PLANT REVIEW FORM

01/17/02

Est. 471  
Kerry Do Brasil Ltda

COUNTRY  
BRAZIL

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr.Marcelo Mazzini & Dr.Pedro Mochado

EVALUATION  
 Acceptable     Acceptable/ Re-review     Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable    M = Marginally Acceptable    U = Unacceptable    N = Not Reviewed    O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 O	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	02 M	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 M	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 U	Processing equipment	62 A
Pest --no evidence	07 M	Operational sanitation	35 U	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 O	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 N	Inspector verification	73 M
Over-product equipment	18 M	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 O	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 O	Inspection supervision	76 U
Dry storage areas	21 M	Residue reporting procedures	48 O	Control of security items	77 O
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 O	HACCP	82 U
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

<b>FOREIGN PLANT REVIEW FORM</b> (reverse)	01/17/02	Est. 471 Kerry Do Brasil Ltda	Tre Coracoes, (M.C) COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr.Marcelo Mazzini & Dr.Pedro Mochado		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptab

COMMENTS:

- 02. The potabile water storage tank was not properly sealed to prevent the entrance of rain water, insects, and other vermin. Establishment officials ordered correction.
- 04. Receptacles for waste paper were foot-operated at the hand washing stations. Establishment officials ordered correction.
- 07. Gaps at the bottoms of door in the processing room, edible product storage room, and dry storage room were not sealed properly to prevent the entry of rodents and other vermin. Establishment officials ordered correction.
- 18. Overhead pipes in the surge room were observed with accumulation of dirt and roduct residue. Establishment officials ordered correction.
- 34, 35. a) The daily pre-operational and operational sanitation monitoring record and any corrective actions taken was not maintained by the establishment officials.
- b) GOB meat inspection officials were not monitoring/verifying the adequacy and effectiveness of the pre-operational and operational sanitation SSOP.
- 73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials
- 76. The monthly supervisory visits were not performed since January 2001.
- 82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implimentation such as 1) flow chart that describes the process steps and product flow; 2) conduct a hazard analysis; 6) specify critical limits for each CCP and the frequency with which these procedures would be performed 7) corrective actions and preventive measures to be followed in response to deviations from critical limits; 8) HACCP plan was not validated to determine if it was functioning as intended; 9) establishment ongoing verification procedures, and the frequency with which these procedures would be performed to verify that the plan was being effectively implimented.

**FOREIGN PLANT REVIEW FORM**

REVIEW DATE ESTABLISHMENT NO. AND NAME

01/29/02

Est. 504  
Bertin Ltda

CITY  
Ituiutaba

COUNTRY  
BRAZIL

NAME OF REVIEWER  
Dr. Faiz R. Choudry

NAME OF FOREIGN OFFICIAL  
Dr. Carlos Tedesco Silva

EVALUATION

Acceptable  Acceptable/  
Re-review  Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

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Pest --no evidence	07 M	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 M	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
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Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
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Personal hygiene practices	26 A	Ingredients identification	53 O		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	01/29/02	Est. 504 Bertin Ltda	Iturubá COUNTRY BRAZIL
NAME OF REVIEWER Dr. Faiz R. Choudry	NAME OF FOREIGN OFFICIAL Dr. Carlos Tedesco Silva		EVALUATION <input type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

07. A few flies were observed in the slaughter room. Establishment officials indicated that they would take corrective and preventive measures immediately.
11. Light at the low-rail carcass postmortem inspection stations was inadequate. Establishment officials ordered corrections.
31. Product that contacted the floor (drop meat) was not being reconditioned by the establishment personnel. The GOB meat inspector was trimming the meat instead of verifying the adequacy and effectiveness of handling and reconditioning of drop meat in a sanitary manner by the establishment personnel.
34. The daily pre-operational sanitation deficiencies were not identified by the GOB inspection officials.
73. The ongoing verification activities of the HACCP program were not performed adequately by the GOB inspection officials
76. Periodic supervisory visits were not performed monthly. Only two internal reviews were conducted per year by the local/state officials.
77. Inspection devices (brands) were not kept adequately under inspectional control and the inventory of inspection devices (brands) were not maintained properly by the inspection officials. Inspection officials indicated that it would be rectified immediately.
82. Establishment met FSIS basic regulatory requirements of HACCP program. The HACCP plan(s) did not address adequately the applicable regulatory requirements for implementation such as 1) flow chart that describes the process steps and product flow; 8) HACCP plan was not validated to determine if it was functioning as intended; 10) recordkeeping system that documents the monitoring of the CCPs and/or includes records with actual values and observations.

FEDERAL PUBLIC SERVICE  
MINISTRY OF AGRICULTURE AND SUPPLY – MA  
DEPARTMENT OF FARMING AND CATTLE  
INSPECTION OF PRODUCTS OF ANIMAL ORIGIN  
DIVISION OF INTERNATIONAL COMMERCE CONTROL

Document no. 114/2002/DCI/DIPOA

Brasilia, March 13, 2002

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

To: SIPAs Directors, for FSISs accredited for export into the USA.

Subject: Visit of the Veterinary Mission of the United States of America to Brazilian industries.

We are sending herewith the observations made by the Veterinary Mission of the United States of America, represented by Dr. Faizur Choudry, of FSIS/USDA, in January 2002.

General observations:

- Covering of all door cracks and gaps and other places of indoor access;
- Improvement of sanitation of utensils used in the industry;
- In can incubation rooms, thermometers and temperature sensors must be placed at average shelf height in order for temperature readings to be reflective of the full environment;
- Lighting of inspection areas and CCPs must be at least 540 lux;
- Preventive measures must be implemented in order to keep insects out of all plant indoor areas;
- The problem of condensation in chambers is considered critical by the USA, what could result in withholding or removal from list of exporters. Consequently, all efforts should be made to avoid that such situation occurs;
- All sterilizers must be designed so that the junction knife/cable remains submersed;

PPHO

- PPHO plan must include pre-operational and operational descriptions regarding **cleaning and sanitation** practices of the establishment and equipment in general;
- Monitoring of pre-operational activities must be performed prior to the start of those activities with enough time in advance so that adequate corrective actions may be implemented and that the

Federal Inspection Service may check and approve the pertinent activity;

- Good Production Practices must describe all procedures pertaining to the activities performed in the establishment, separately from PPHO;
- Implementation of preventive measures in the pre-operational and operational stages;
- Irregularities observed on the check-list must be clearly marked as acceptable or not acceptable;
- Those corrective actions implemented must be described in detail and be inserted in the same record card where noncompliances are classified;
- Pre-operational and operational procedures must be described in separate within the Standard Procedure for Operational Sanitation (PPHO);
- The PPHO must indicate who is responsible for overseeing the described procedures (obs: it is not necessary that the employee's name be mentioned, only his position and/or sector);
- Monitoring of pre-operational activities must be performed prior to the start of those activities with enough time in advance so that adequate corrective actions may be implemented and that the Federal Inspection Service may check and approve the pertinent activity;
- Pre-operational descriptions regarding cleaning and sanitation practices regarding equipment and tables;
- Irregularities observed must be described in detail and correctly identified (ex: dirt is a generic word, the type of dirt must be specified).

#### HACCP:

- During risk analysis, when a CCP is determined, it must be considered that biologic, physical and chemical risks must be taken into consideration because there are preventive and corrective actions specific for each risk in consideration and must be clearly considered CCPs;
- The HACCP plan must be described in detail, and must be written in a manner that anyone who reads the narrative may be able to clearly visualize it;
- All procedures described in the HACCP plan must be faithfully performed by the establishment. The discrepancy between the procedures described in the plan and their performance by the industry is considered a serious failure (ex: corrective/preventive measures in loco performed differently than those described in the plan);
- The flow-chart and HACCP risk analysis must include the primary and secondary packaging and additives;

- Corrective and preventive measures must be clearly identified for each CCP (physical, chemical and biological);
- Each step of the process must be analyzed for PC and CCP identification, which must be duly justified through regulations, scientific literature, etc.;
- Corrective actions must be followed by preventive measures in order to avoid recurrence of noncompliance;
- The frequency of checking procedures as described in the plan must be specified;
- Checking procedures must focus on three factors: calibration of all equipment used in monitor procedures, direct observation of monitoring activities and corrective actions, and record review. Direct measuring should also be used for checking monitoring procedures;
- When sampling is used to monitor a specific CCP, the corrective actions used for each unit not checked during the period of time between monitoring activities if a critical deviation is detected during monitoring must be recorded;
- The monitoring record card must include a section for the individual record of each unit under monitoring;
- The critical limit may not be established by a break;
- The HACCP Plan must indicate who is responsible for overseeing the described procedures (obs: it is not necessary that the employee's name be mentioned, only his position and/or sector);
- Only those items classified in the risk analysis as hazard to public health must be listed as CCPs;
- In case of deviation from a critical limit, monitoring frequency must be increased until control of the situation in question has been reestablished;
- Thermometers must be identified with numbers for checking control;

#### Pre-shipment review:

- Prior to product shipment into the USA, all CCPs monitoring records must be reviewed by Quality Control in order to ensure critical limits control;
- As directed by the U.S. Veterinary Mission, review must be performed immediately prior to issuing the International Sanitation Certificate, focusing on merchandise production dates to be shipped on that date. Daily CCP review is not acceptable to comply with pre-shipment procedures;
- CCP pre-shipment review must generate a specific record, initialed by Quality Control. Occasionally, Federal Inspection must review records prior to issuing the International Sanitation Certificate;

- The pre-shipment review mentioned in this paragraph applies only to CCPs, and doesn't involve other controls already routinely performed during product shipment;
- Pre-shipment control must be clear and must include corrective actions whenever necessary;

Federal Inspection (Information limited to FSIS):

- FSIS must keep inventory and daily control of release of the official stamps used in the several establishment sectors, by number and type (in use, outdated, new, etc.). Stamps must be kept in a cabinet at the IF main office under FSIS veterinary surveillance, in order to ensure stamp access to be controlled and inviolable, by means of sealing-wax, locker with code or any other means;
- Any time FSIS controls find any serious or mild irregularity relapses, a letter must be immediately sent to the establishment supervisor in order for the situation to be corrected;
- All irregularities observed regarding PPHO compliance must be recorded in detail;
- Pathogen reduction program regarding *Salmonella*:
  - FSIS will be responsible for supervision or sample collection, preparation and shipment, as well as for the results;
  - This is an official program, and must be kept in the Inspection main office;
  - In case of positive results, all actions must be implemented according to the instructions received by Circular-letter 113/2002/DCI/DIPOA.

We would like to request that all FSISs accredited for export into the United States of America be attentive and adopt preventive/corrective actions regarding irregularities and observations reported by the U.S. Mission.

Sincerely,

Marcelo Vieira Mazzini

Copy for: SIPAs/DFAs; SVAs/DFAs at international borders (ports, airports and border stations); DPB/MRE; ABIEC

MVM(DCI)mcc.