



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

FEB 12 2009

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

Dear Dr. Vicente:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Costa Rica's meat inspection system April 17 through April 28, 2008. Comments received from the government of Costa Rica are included as an attachment to the final report. Enclosed is a copy of the final audit report. We apologize for the delay in the submission of this report

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

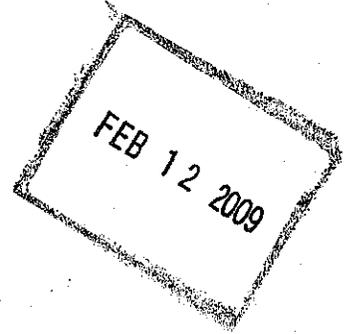
Sincerely,

*Don Carlson, acting Director*

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

Enclosure

U. S. DEPARTMENT OF AGRICULTURE  
FOOD SAFETY AND INSPECTION SERVICE  
OFFICE OF INTERNATIONAL AFFAIRS  
INTERNATIONAL AUDIT STAFF  
WASHINGTON, DC  
202-205-3873  
FAX 202-720-0676



**MEMORANDUM**

TO: Kevin N. Smith  
Agricultural Counselor  
US Embassy, San Jose  
Office of Agricultural Affairs  
Frente Al Centro  
Comercial De Pavas  
San Jose  
Costa Rica

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

SUBJECT: FSIS FINAL AUDIT REPORT FOR COSTA RICA

Dear Mr. Smith,

Please deliver the attached final audit report to Dr. Yayo Vicente, Director, Servicio Nacional de Salud Animal (SENASA), Ministerio de Agricultura y Ganaderia (MAG). Please contact me via email at [manzoor.chaudry@fsis.usda.gov](mailto:manzoor.chaudry@fsis.usda.gov), if you have any further questions.

Best regards,

*Manzoor Chaudry*

*Manzoor Chaudry*

cc list:

Kevin N. Smith, Agricultural Counselor, US Embassy, San Jose  
Laura Dachner, Minister Counselor, Embassy of Costa Rica  
OSTA/FAS  
Hugh Maginnis, FAS Area Officer  
Ann Ryan, State Department  
Lisa Wallenda Picard, Chief of Staff, OA  
Alfred Almanza, Administrator, FSIS  
Ronald K. Jones, Assistant Administrator, OIA  
Philip Derfler, Assistant Administrator, OPPD, FSIS  
Daniel Engeljohn, Deputy Assistant Administrator, OPPD, FSIS  
Director, IAS, OIA, FSIS  
Rick Harries, Acting Director, EPS, OIA  
Stephen Hawkins, Acting Director, IES, OIA  
Jerry Elliott, Director, IID, OIA  
Barbara McNiff, Director, FSIS Codex Programs Staff, OIA  
Yolande Mitchell, FCPS, OIA  
David Smith, IES, OIA  
Costa Rica Country File

FSIS:OIA:IAS:DIRECTOR:202-205-3873:COSTARICA  
FINAL AUDIT LETTER February 12, 2009

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

**APRIL 17 THROUGH APRIL 28, 2008**

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

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## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

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



## 1. INTRODUCTION

The audit took place in Costa Rica from April 17 through April 28, 2008.

An opening meeting was held on April 17 in Lagunilla, Heredia with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the details of the audit itinerary, and requested additional information needed to complete the audit of Costa Rica's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the *Servicio Nacional de Salud Animal* (SENASA) National Service of Animal Health, its Division of Zoo Sanitary Export and Quarantine, *Direccion de Inocuidad Productos Origen Animal* (DIPOA) and, when appropriate, representatives from the local inspection offices.

## 2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the Senior Program Auditor visited the following sites: the headquarters of the CCA; the two laboratories performing analytical testing on U.S.-destined product; and two slaughter/processing establishments and one processing establishment eligible to export to the U.S.

Competent Authority Visits		Comments
Central Competent Authority	1	Heredia
Local Establishment Offices	3	Heredia, Alajuela
Laboratories	2	Heredia
Meat Slaughter/Processing and Processing Establishments	3	Heredia, Alajuela

## 3. PROTOCOL

The official on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in Costa Rica's inspection headquarters offices. The third part involved on-site visits to the two beef slaughter/processing and one processing establishments certified by Costa Rica as eligible to export to the U.S.. The fourth part involved visits to two divisions of one government-owned and -operated laboratory. The *Laboratorio Nacional de Servicios Veterinarios* (LANASEVE), National Residue and Microbiology Veterinary Laboratory, was conducting analyses of field samples for Costa Rica's national residue control program and the pathogen reduction program for *Salmonella* species (*Salmonella*).

Program effectiveness determinations of Costa Rica's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP) and Sanitation Performance Standards (SPS); (2) animal disease controls; (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) programs and the testing program for generic *Escherichia coli* (*E. coli*); (4) residue controls; and (5) enforcement controls, including the testing program for *Salmonella* species (*Salmonella*). Costa Rica's inspection system was assessed by evaluating these five risk areas.

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

During the opening meeting, the auditor explained that Costa Rica's inspection system would be audited in accordance with two areas of focus. First, the auditor would audit against Food Safety and Inspection Service (FSIS) requirements. These include: daily inspection in all certified establishments; humane handling and slaughter of livestock; the handling and disposal of inedible and condemned materials; species verification testing; and FSIS requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella*.

Second, the auditor would audit against any equivalence determinations that have been made by FSIS for Costa Rica under provisions of the Sanitary/Phytosanitary Agreement. Currently, Costa Rica has one equivalence determination, which was issued in February 2005. Establishment personnel collect samples of product for generic *E. coli* testing and analysis is conducted in official government laboratories.

#### 4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of U.S. laws and regulations; in particular:

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

#### 5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on the FSIS website at:

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

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

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

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

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

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

## 6. MAIN FINDINGS

### 6.1 Government Oversight

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

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

All inspection personnel assigned to establishments certified to export meat to the U.S. are full-time government employees receiving no compensation from either industry or establishment personnel. Inspection personnel can hold outside employment provided it does not serve as a conflict of interest with their inspection duties.

Meat export certificates are controlled by the Chief Veterinary Officer (CVO) and are signed and distributed on an as-needed basis to the official inspection personnel stationed at the certified establishments. Additionally, the CVO maintains documented control of all official government seals and stamps. The Veterinarians-in-Charge (VICs) in the three establishments certified as eligible to export to the U.S. maintain physical control of all assigned government seals and stamps.

Verification activities are performed through monthly supervisory audits and inspection verification of establishment activities. Suspension and withdrawal of inspection is authorized by the Chief of DIPOA.

#### 6.1.1 CCA Control Systems

The DIPOA is headed by a CVO who has the responsibility for oversight of Costa Rica's meat and poultry establishments. During this audit, the CVO accompanied the FSIS auditor and served as an audit leader for the three establishment audits. Additionally, the DIPOA has authority over live animal issues in Costa Rica relative to livestock and poultry movements and disease.

#### 6.1.2 Ultimate Control And Supervision

At each certified establishment, the VIC has the authority to cease the establishment's production operations *any time the wholesomeness and safety of the product is jeopardized*. The VIC reports directly to the CVO regarding enforcement activities. The CCA has direct supervision over inspection personnel at establishments certified to export to the U.S. Costa Rica is using a system similar to the FSIS Performance Based Inspection System (PBIS) with weekly assignments for inspection personnel. Additionally, monthly supervisory audits are performed. A decision to suspend the operations of an establishment for non-compliance or to delist an establishment from exporting to the U.S. is authorized by the Head of the Inspection Service.

The VIC has direct supervision over other inspection personnel assigned to certified establishments. In the three establishments audited that are certified to export meat to the U.S., the DIPOA has the inspection personnel to carry out the FSIS requirements.

The government of Costa Rica has the organizational structure and staffing to ensure uniform implementation of U.S. import requirements.

#### 6.1.3 Assignment of Competent, Qualified Inspectors

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

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

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

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

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

#### 6.1.5 Adequate Administrative and Technical Support

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

#### 6.2 Headquarters Audits

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

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

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

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

## 7. ESTABLISHMENT AUDITS

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

## 8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

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

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

The following laboratory was audited:

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

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

## 9. SANITATION CONTROLS

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

Based on the on-site audits of establishments, Costa Rica's inspection system had controls in place for SSOP programs, good personal hygiene practices, and good product handling and storage practices.

## 9.1 Sanitation Standard Operating Procedures

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

The following deficiencies were reported:

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

## 9.2 Sanitation Performance Standards

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

The following deficiency was reported:

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

## 10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditors reviewed was Animal Disease Controls. These controls include: ensuring adequate animal identification; control over condemned and restricted product; and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Costa Rica's inspection system had adequate controls in place.

No deficiencies were reported.

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

## 11. SLAUGHTER/PROCESSING CONTROLS

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

mortem inspection procedures; post-mortem disposition; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

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

#### 11.1 Humane Handling and Humane Slaughter

No deficiencies were reported.

#### 11.2 HACCP Implementation including implementation of a Bovine Spongiform Encephalopathy-Specified Risk Material (BSE-SRM) Program

Both slaughter establishments approved to export meat products to the U.S. are required to have developed and adequately implemented HACCP programs. Each of these programs was evaluated according to the criteria employed in the U.S. domestic inspection program. The BSE-SRM program was properly implemented.

No deficiencies were reported.

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

Costa Rica has adopted the FSIS regulatory requirements for testing for generic *E. coli*. Both establishments were required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* and were evaluated according to the criteria employed in the U.S. domestic inspection program. Testing for generic *E. coli* was properly conducted in both establishments.

#### 11.4 Testing for *Listeria monocytogenes*

None of the establishments audited were producing any ready-to-eat (RTE) products, either for the U.S. or for any other domestic or foreign markets, so the requirements for testing for *Listeria monocytogenes*, according to the Final Rule of June 6, 2003, did not apply to these establishments.

### 12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls included: 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 government-owned and -operated LANASEVE, National Residue and Microbiology Veterinary Laboratory, was audited.

No deficiencies were reported.

### 13. ENFORCEMENT CONTROLS

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

#### 13.1 Daily Inspection in Establishments

Documented daily inspection was provided in both establishments on days during which U.S.-eligible product was produced.

#### 13.2 Testing for *Salmonella* Species

Costa Rica has adopted the FSIS regulatory requirements for testing for *Salmonella*. Both slaughter establishments were evaluated according to the criteria employed in the U.S. domestic inspection program.

No deficiencies were reported.

#### 13.3 Testing for *E. coli* O157:H7

No deficiencies were reported.

#### 13.4 Species Verification

At the time of this audit, Costa Rica was required to test product for species verification. Species verification was being conducted in both of the slaughter/processing establishments as required.

#### 13.5 Periodic Reviews

Periodic supervisory reviews of all certified establishments were being performed and documented as required.

#### 13.6 Inspection System Controls

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

Furthermore, controls were in place for: security items; shipment security; and products entering the establishments from outside sources.

National mandates for the implementation of compliance with the requirements for special handling of SRMs regarding BSE have been implemented. Non-ambulatory cattle are condemned upon ante-mortem inspection; no beef containing SRMs is

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

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

#### 14. CLOSING MEETING

A closing meeting was held on April 28 with the CCA. At this meeting, the preliminary findings from the audit were presented by the auditor.

The CCA understood and accepted the findings.

*For*  
Oto Urban, DVM  
Senior Program Auditor

*by*  
Don Carlson, DVM

15. ATTACHMENTS

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

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION COOPEMONTENCILLOS R.L. # 8 Contigua al MOPT Alajuela Alajuela, Montecillos Costa Rica	2. AUDIT DATE 04/24/2008	3. ESTABLISHMENT NO. 8	4. NAME OF COUNTRY Costa Rica
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

**Est. 8; Montecillos, Alajuela, Costa Rica, April 24, 2008 (beef slaughter & processing)**

“There were no significant findings to report after consideration of the nature, degree and extent of all observations.”

61. NAME OF AUDITOR

Oto Urban. DVM

62. AUDITOR SIGNATURE AND DATE

*J. B. Starn* for Oto Urban DVM

12/2/08

### Foreign Establishment Audit Checklist

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

2. AUDIT DATE  
04/21/2008

3. ESTABLISHMENT NO.  
12

4. NAME OF COUNTRY  
Costa Rica

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

6. TYPE OF AUDIT  
 ON-SITE AUDIT  DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Est. 12; **EL ARREO, Lo Ribera, Belen, Heredia, Costa Rica**  
April 21, 2008 (beef slaughter & processing)

10/51 During operational sanitation inspection in the boning room, a conveyor belt was observed with several cracks in the contact surface, which made it difficult to clean.

This deficiency was scheduled for correction by the establishment personnel. [Regulatory references: 9CFR 416.13(c), 416.17].

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

Establishment personnel took immediate corrective action. [Regulatory reference: 9CFR 416.4(d)].

61. NAME OF AUDITOR

Oto Urban. DVM

62. AUDITOR SIGNATURE AND DATE

*Oto Urban DVM* for *Oto Urban DVM* 12/2/08

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION PROCESADORA de CARNE EL REY S.A. Asuncion de Belen Heredia Costa Rica	2. AUDIT DATE 04/23/2008	3. ESTABLISHMENT NO. 19	4. NAME OF COUNTRY Costa Rica	5. NAME OF AUDITOR(S) Oto Urban, DVM	6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT
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Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

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

60. Observation of the Establishment

Est. 19; **PROCESADORA de CARNE EL REY S.A.**, Asuncion de Belen, Heredia, Costa Rica,  
(processing)

10/51 During the pre-operational sanitation inspection in the frozen patties processing room, a conveyor belt was observed with several wires missing, which made it difficult to clean. This deficiency was scheduled for correction by the establishment personnel. [Regulatory references: 9CFR 416.13(c), 416.17].

61. NAME OF AUDITOR  
Oto Urban. DVM

62. AUDITOR SIGNATURE AND DATE

*[Handwritten Signature]* for Oto Urban DVM 12/2/08

Ministerio de Agricultura y Ganadería  
Servicio Nacional de Salud Animal  
Tel.: (506) 2262-0221 Fax: (506) 2262-0221  
www.senasa.go.cr  
San José, Costa Rica



February, 16 th, 2009  
SENASA-DG-237-2009

Dr  
Manzoor Chaudry  
Deputy Director  
International Audit Staff  
OIA/FSIS/USDA  
1400 Independence, SW, Room 2543 S  
Washington, D. C. 20250  
Washington, DC 20250  
(202) 205-3969  
(202) 720-0676 fax

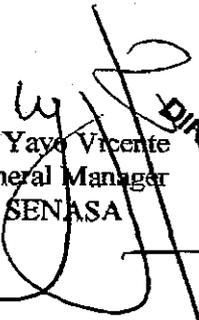
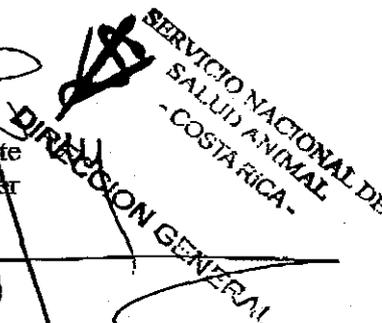
Dear Dr. Chaudry:

Based on the report of the audit conducted last year by the FSIS of the Costarrican meat inspection service and after analyzing it, we would like to inform you that we have read it and found no objections to it. Therefore we accept all the comments expressed and after reading your recent communication for the next audit which will be performed by march 2009, we will be looking forward for it and express you our willingness to have a member of your team evaluating our system and programs in order to comply with your current regulations.

With no other comments to add,

Sincerely,

Dr. Yayo Vicente  
General Manager  
SENASA

C:  
Dr. Fernando Calderón, Director DIPOA.  
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