



United States Department of Agriculture

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Dear Dr. Videla,

The United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) conducted an onsite verification audit of Chile's meat and poultry inspection system from January 13 through January 28, 2020. Enclosed is a copy of the final audit report. The comments received from the Agricultural and Livestock Service are included as an attachment to the report.

Should you have any questions regarding the audit report, please contact the Office of International Coordination by electronic mail at [InternationalCoordination@usda.gov](mailto:InternationalCoordination@usda.gov).

Sincerely,

Michelle Catlin, PhD  
International Coordination Executive  
Office of International Coordination

Enclosure

FINAL REPORT OF AN AUDIT CONDUCTED IN CHILE

JANUARY 13–28, 2020

EVALUATING THE FOOD SAFETY SYSTEMS GOVERNING

MEAT AND POULTRY

EXPORTED TO THE UNITED STATES OF AMERICA

July 2, 2020

Food Safety and Inspection Service  
United States Department of Agriculture

## **Executive Summary**

This report describes the outcome of an onsite equivalence verification audit conducted by the United States Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) from January 13–28, 2020. The purpose of the audit was to determine whether Chile's food safety inspection system governing meat and poultry remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. Chile currently exports raw intact beef, lamb, mutton, pork, chicken, and turkey; raw non-intact chicken and turkey; and not ready-to-eat otherwise processed chicken to the United States.

The audit focused on six system equivalence components: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Point (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

An analysis of the findings within each component did not identify any deficiencies that represented an immediate threat to public health. The FSIS auditors identified the following findings:

### **GOVERNMENT OVERSIGHT (e.g., ORGANIZATION AND ADMINISTRATION)**

- The central competent authority (CCA) does not have a mechanism or procedure in place that requires that livestock carcasses and parts subjected to routine chemical residue testing be precluded from export to the United States until receipt and confirmation of acceptable testing results.

### **GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS**

- Government inspectors did not observe the interior of the poultry carcasses during post-mortem inspection. The incomplete observation of the interior of the carcass is a repeat finding from the 2018 audit.

### **GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM**

- Government inspectors did not verify that the hazard analyses addressed chemical hazards associated with restricted ingredients (e.g., sodium phosphate and potassium phosphate).
- Government inspectors did not verify the HACCP plans complied with the CCA's requirements for HACCP plan content.
- Government inspectors did not verify the establishments complied with the CCA's requirements for HACCP recordkeeping.

During the audit exit meeting, the CCA committed to address the preliminary findings as presented. FSIS will evaluate the adequacy of the CCA's documentation of proposed corrective actions and base future equivalence verification activities on the information provided.

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## I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) conducted an onsite audit of Chile's food safety inspection system from January 13–28, 2020. The audit began with an entrance meeting held on January 13, 2020, in Santiago, Chile, during which the FSIS auditors discussed the audit objective, scope, and methodology with representatives from the central competent authority (CCA) – Agriculture and Livestock Service (*Servicio Agrícola y Ganadero* [SAG]). During the audit exit meeting on January 28, 2020, SAG committed to address the preliminary findings. Representatives from SAG accompanied the FSIS auditors throughout the entire audit.

## II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit objective was to determine whether Chile's food safety system governing meat and poultry remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. Chile is eligible to export the following categories of products to the United States:

Process Category	Product Category	Eligible Products <sup>1</sup>
Raw – Non-Intact	Raw ground, comminuted, or otherwise non-intact beef	Beef patty product; bench trim from non-intact; formed steaks; ground beef; hamburger; non-intact cuts; other non-intact; sausage; and trimmings from non-intact.
Raw – Non-Intact	Raw ground, comminuted, or otherwise non-intact pork	Ground product; other non-intact; and sausage.
Raw – Non-Intact	Raw ground, comminuted, or otherwise non-intact other (lamb and mutton)	Ground product; other non-intact; and sausage.
Raw – Non-Intact	Raw ground, comminuted, or otherwise non-intact poultry (chicken and turkey)	Ground product; other non-intact; and sausage.
Raw – Intact	Raw intact beef	Boneless manufacturing trimmings; carcass (including halves or quarters); cuts (including bone in and boneless meats); edible offal; other intact; and primals and subprimals.

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<sup>1</sup> All source meat and poultry used to produce products must originate from eligible countries and establishments certified to export to the United States. For processed poultry products, poultry includes the following species: chicken, duck, goose, guinea, squab, turkey, emu, ostrich, and rhea.

<b>Process Category</b>	<b>Product Category</b>	<b>Eligible Products<sup>1</sup></b>
Raw – Intact	Raw intact pork	Boneless manufacturing trimmings; carcass (including halves or quarters); cuts (including bone in and boneless meats); edible offal; other intact; and primals and subprimals.
Raw – Intact	Raw intact meat-other (lamb and mutton)	Boneless manufacturing trimmings; carcass (including carcass halves or quarters); cuts (including bone in and boneless meats); edible offal; other intact; and primals and subprimals.
Raw – Intact	Raw intact poultry (chicken and turkey)	Boneless and/or skinless parts; boneless manufacturing trimmings; poultry parts (including necks/feet and giblets); and whole bird.
Heat Treated but not Fully Cooked – Not Shelf Stable	Not ready-to-eat (NRTE) otherwise processed poultry (chicken and turkey)	Bacon; meals/dinners/entrees; other; pies/pot pies; rendered fats, oils; sandwiches/filled rolls/wraps; sauces; sausages; smoked parts; and soups.
Heat Treated – Shelf Stable	NRTE otherwise processed poultry (chicken and turkey)	Bacon; meals/dinners/entrees; other; pies/pot pies; rendered fats, oils; sandwiches/filled rolls/wraps; sauces; smoked parts; and soups.

The USDA’s Animal and Plant Health Inspection Service (APHIS) recognizes Chile as free of African swine fever, highly pathogenic avian influenza, and Newcastle disease. APHIS also considers Chile as free of classical swine fever, foot-and-mouth disease, and swine vesicular disease with special restrictions, and negligible risk for bovine spongiform encephalopathy (BSE).

Prior to the onsite equivalence verification audit, FSIS reviewed and analyzed Chile’s self-reporting tool (SRT) responses and supporting documentation. During the audit, the FSIS auditors conducted interviews, reviewed records, and made observations to determine whether Chile’s food safety inspection system governing meat and poultry is being implemented as documented in the country’s SRT responses and supporting documentation.

FSIS applied a risk-based procedure that included an analysis of country performance within six equivalence components, product types and volumes, frequency of prior audit-related site visits, point-of-entry (POE) reinspection and testing results, specific oversight activities of government offices, and testing capacities of laboratories. The review process included an analysis of data collected by FSIS over a three-year period, in addition to information obtained directly from the CCA through the SRT.

Determinations concerning program effectiveness focused on performance within the following six components upon which system equivalence is based: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Point (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

Administrative functions were reviewed at CCA headquarters, one regional office, one sectorial office, and nine local inspection offices within the establishments. The FSIS auditors evaluated the implementation of control systems in place that ensure the national system of inspection, verification, and enforcement is being implemented as intended.

A sample of nine establishments was selected from a total of 18 establishments eligible to export to the United States. This included two chicken, one chicken and turkey, one turkey, one pork, two beef, one lamb, and one beef and lamb slaughter and processing establishments. The products these establishments produce and export to the United States include raw intact beef, lamb, mutton, pork, chicken, and turkey; raw non-intact chicken and turkey; and NRTE otherwise processed chicken.

During the establishment visits, the FSIS auditors paid particular attention to the extent to which industry and government interacted to control hazards and prevent noncompliance that threatens food safety. The FSIS auditors assessed the CCA's ability to provide oversight through supervisory reviews conducted in accordance with FSIS equivalence requirements for foreign food safety inspection systems outlined in Title 9 of the United States Code of Federal Regulations (9 CFR) 327.2 and 381.196.

Additionally, FSIS visited the microbiology and residue divisions of the SAG Central Laboratory to verify their ability to provide adequate technical support to the food safety inspection system.

Competent Authority Visits		#	Locations
Competent Authority	Central	1	• SAG Headquarters, Santiago
	Regional	1	• Libertador General Bernardo O'Higgins Regional Office, Rancagua
	Sectorial	1	• Osorno Sectorial Office, Osorno
Laboratory		1	• SAG Central Laboratory, Microbiological and Residue Divisions (government), Santiago
Beef slaughter and processing establishments		2	• Establishment No. 10-15, Matadero Frigorífico Del Sur S.A., Osorno
			• Establishment No. 10-26, Frigorífico de Osorno S.A., Osorno
Chicken slaughter and processing establishments		2	• Establishment No. 01-11, Agroindustrial Arica S.A., Arica
			• Establishment No. 06-08, Faenadora San Vicente Ltda., San Vincent de Tagua

Chicken and turkey slaughter and processing establishment	1	<ul style="list-style-type: none"> <li>Establishment No. 13-07, Agroindustrial el Paico Ltda., El Monte</li> </ul>
Lamb, mutton, and beef slaughter and processing establishment	1	<ul style="list-style-type: none"> <li>Establishment No. 12-01, Frigorífico Simunovic S.A., Punta Arenas</li> </ul>
Lamb and mutton slaughter and processing establishment	1	<ul style="list-style-type: none"> <li>Establishment No. 12-05, Soc. Com. José Marín Antonín Y Cia. Ltda., Punta Arenas</li> </ul>
Pork slaughter and processing establishment	1	<ul style="list-style-type: none"> <li>Establishment No. 06-06, Procesadora de Alimetos Del Sur Limitada, Rengo</li> </ul>
Turkey slaughter and processing establishment	1	<ul style="list-style-type: none"> <li>Establishment No. 05-09, Sopraval S.A., La Calera</li> </ul>

FSIS performed the audit to verify the food safety inspection system met requirements equivalent to those under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 United States Code [U.S.C.] Section 601 *et seq.*);
- The Humane Methods of Livestock Slaughter Act (7 U.S.C. Sections 1901-1906);
- The Meat Inspection Regulations (9 CFR Parts 301 to the end);
- The Poultry Products Inspection Act (21 U.S.C. Section 451 *et seq.*); and
- The Poultry Products Inspection Regulations (9 CFR 381).

The audit standards applied during the review of Chile's inspection system for meat and poultry included: (1) all applicable legislation originally determined by FSIS as equivalent as part of the initial review process, and (2) any subsequent equivalence determinations that have been made by FSIS under provisions of the World Trade Organization's (WTO) *Agreement on the Application of Sanitary and Phytosanitary Measures*.

### III. BACKGROUND

From August 1, 2016 to July 31, 2019, FSIS import inspectors performed 100 percent reinspection for labeling and certification on 17,262,507 pounds of meat and 300,317,702 pounds of poultry from Chile. This included 925,637 pounds of raw intact beef; 3,802,779 pounds of raw intact lamb; 627,359 pounds of raw intact mutton; 11,906,732 pounds of raw intact pork; 2,529,839 pounds of raw intact chicken; 265,677,301 pounds of raw non-intact chicken; 1,871,649 pounds of NRTE otherwise processed chicken; 27,454,089 pounds of raw intact turkey; and 2,784,824 pounds of raw non-intact turkey exported by Chile to the United States.

FSIS also performed reinspection on 3,326,166 pounds of meat (1,104 pounds of raw intact beef; 614,563 pounds of raw intact lamb; 259,927 pounds of raw intact mutton; and 2,450,572 pounds of raw intact pork) and 31,302,994 pounds of poultry (324,351 pounds of raw intact chicken; 27,754,927 pounds of raw non-intact chicken; 205,778 pounds of NRTE otherwise processed chicken; 2,774,672 pounds of raw intact turkey; and 243,266 pounds of raw non-intact turkey) at POE for additional types of inspection.



These additional types of inspection included testing for chemical residues and microbiological pathogens including Shiga toxin-producing *Escherichia coli* [STEC] O157:H7, O26, O45, O103, O111, O121, and O145 in beef. As a result of this additional testing, 85,288 pounds of raw intact pork were rejected for issues related to public health, including two lots totaling 76,129 pounds of raw intact pork due to fecal contamination and one lot of 9,159 pounds of raw intact pork due to the presence of foreign material.

The previous audit in 2018 identified the following findings:

<b>Summary of Findings from the 2018 FSIS Audit of Chile</b>	
<b>Component 2: Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling)</b>	
<ul style="list-style-type: none"> <li>The post-mortem inspection procedures for poultry did not consistently include observation of the interior of the carcasses nor surfaces of the tibiotarsal joints. The incomplete observation of surfaces of the tibiotarsal joints is a repeat finding from the 2016 audit.</li> </ul>	
<b>Component 4: Government Hazard Analysis and Critical Control Point (HACCP) System</b>	
<ul style="list-style-type: none"> <li>The CCA is not requiring establishments to incorporate pre-chill sampling of poultry carcasses for microbial organisms within their HACCP systems. All three audited poultry slaughter establishments lacked written programs and procedures to conduct pre-chill sampling.</li> <li>The two beef establishments with confirmed positive STEC results have not identified STEC as a hazard reasonably likely to occur in the slaughter process.</li> </ul>	
<b>Component 5: Government Chemical Residue Testing Programs</b>	
<ul style="list-style-type: none"> <li>The CCA conducts residue analysis on primary samples but defers confirmation until the National Reference Laboratory determines and officially reports positive results for secondary and tertiary samples. This methodology is not consistent with FSIS requirements for which a collected sample and corresponding analytical result is expected to be representative of the sampled animal.</li> </ul>	
<b>Component 6: Government Microbiological Testing Programs</b>	
<ul style="list-style-type: none"> <li>At one establishment, the CCA's methodology for collecting samples of raw beef trim for purposes of STEC analysis does not target surface tissue and is not equivalent to FSIS sampling methods for slaughter operations.</li> <li>The CCA's official STEC reports are insufficient to accurately document the analytical methods and results for inspection personnel at the establishment level.</li> </ul>	

The FSIS auditors verified that the previously reported audit findings had been adequately addressed by the CCA. However, at one chicken slaughter and processing establishment, the post-mortem inspections procedures did not include observation of the interior of the carcasses. This issue is discussed under Component 2.

The FSIS final audit reports for Chile's meat and poultry inspection system are available on the FSIS website at: [www.fsis.usda.gov/foreign-audit-reports](http://www.fsis.usda.gov/foreign-audit-reports).

#### IV. COMPONENT ONE: GOVERNMENT OVERSIGHT (e.g., ORGANIZATION AND ADMINISTRATION)

The first of six equivalence components the FSIS auditors reviewed was Government Oversight. FSIS import regulations require the foreign food safety inspection system to be organized by the national government in such a manner as to provide ultimate control and supervision over all official inspection activities; ensure the uniform enforcement of requisite laws; provide sufficient administrative technical support; and assign competent qualified inspection personnel at establishments where products are prepared for export to the United States.

The national government of Chile organizes and manages the meat and poultry inspection system. The CCA is SAG, which is part of the Ministry of Agriculture. The Ministry of Health, (*Ministerio de Salud* [MINSAL]), is responsible for the safety of all food products destined for human consumption and has delegated responsibility for meat and poultry inspection to SAG. SAG is responsible for veterinary drugs, pesticides, and other chemical residues in the production of agricultural products, including meat and poultry. SAG has the responsibility for carrying out Chile's inspection program, including oversight and enforcement of the FSIS regulatory requirements in meat and poultry establishments certified by SAG as eligible to export to the United States. Additionally, SAG has oversight over the residue and microbiology laboratories that analyze products eligible to be exported to the United States.

SAG's regulatory oversight of their meat and poultry inspection system consists of four levels: central, regional, sectorial, and establishment. At the central level, the national directorate includes the Strategic Management Division, the Legal Division, the Management Advisory Staff, the Subdirectorate of Operations, and the National Subdirectorate. The Subdirectorate of Operations includes the Livestock Protection Division, which is comprised of the Department of Animal Health, the Department of Food Safety and Exports, and the Department of Transversal Projects. The Department of Food Safety and Exports is responsible for overseeing the seven regional offices that provide oversight to establishments eligible to export to the United States.

Each regional office is managed by a Regional Director who is responsible for supervising the Livestock Regional Officer (*Encargado Regional Pecuário* [ERP]). The ERP is responsible for coordinating and supporting the sectorial offices and supervises the Regional Supervisor of Inspection and Certification (*Supervisor Regional de Inspección y Certificación* [SRIC]). The SRIC oversees the slaughter establishments eligible to export to the United States, including conducting periodic supervisory reviews, administrative decisions, and competency assessments of the official inspection personnel.

Each sectorial office has an Official Sector Veterinarian (*Médicos Veterinarios Oficiales Sectoriales*) that provides administrative support to the official inspection teams (*equipo de inspección oficial* [EIO]) within the exporting establishments. In establishments eligible to export to the United States, the EIO is supervised by the head of the inspection team (*jefe del equipo de inspección oficial* [JEIO]) and comprised of official veterinary medical inspectors (*médico veterinario inspectores oficiales* [MVIO]) and technical inspection officials (*técnico inspectores oficiales* [TIO]). The FSIS auditors verified that there have been no major changes in SAG's organizational structure since the last FSIS audit conducted in 2018.

The FSIS auditors verified that SAG has the authority and responsibility to certify establishments as eligible to export livestock products. Establishments authorized by SAG as eligible to export in general are added to a list of exporting establishments of livestock products (*listado de establecimientos exportadores de productos pecuarios* [LEEPP]). Once establishments are added to the LEEPP, they can become registered for their eligibility to export eligible products to specific markets in accordance with Resolution No. 1722, *Update to the National System of Registration, Maintenance and Approval of Export Establishments of Livestock Products for Human Consumption and Repeals Resolution No. 7,078, 2011 (Actualiza el Sistema Nacional de Inscripción, Mantención y Habilitación de Establecimientos Exportadores de Productos Pecuarios Para Consumo Humano y Deroga Resolución N 7,078, De 2011)*.

Establishments in the LEEPP can export to the United States if they meet the standards for meat specified in F-PP-IT-047, *Evaluation Standards for the Authorization of Slaughter Establishments to Export Meat to the United States (Pauta de Evaluación para Habilitación de Establecimientos Faenadores para Exportar Carne de Reses de Abasto a EEUU)* and the standards for poultry specified in F-PP-IT-058, *Evaluation Standards for the Authorization of Slaughter Establishments to Export Poultry Meat to the United States (Pauta de Evaluación para Habilitación de Establecimientos Faenadores para Exportar Carne de Ave a EEUU)*. These standards include requirements consistent with 9 CFR 416 sanitation regulations and 9 CFR 417 HACCP regulations. The FSIS auditors verified that SAG officials enforce the requirements outlined in Resolution No. 1722 in order to certify establishments and authorize eligible products for export to the United States.

Establishments registered in the LEEPP are required to implement, apply, and maintain a quality assurance system (*sistema de aseguramiento de calidad* [SAC]) based on the HACCP principles recommended by the *Codex Alimentarius Commission* and on prerequisites such as food hygiene in accordance with Resolution No. 1045, *Specific Requirements for Prerequisite Programs and HACCP to Implement the Quality Assurance System (Exigencias Específicas de los Programas de Prerrequisitos y HACCP para la Implementación del Sistema de Aseguramiento de la Calidad)*. Registered establishments must also sign operational agreements and commit to implement the requirements outlined in Resolution No. 1045. The FSIS auditors verified that establishments eligible to export to the United States maintained a SAC that includes a HACCP system.

Resolution No. 1722 provides SAG with enforcement authority and administrative procedures to suspend establishments or processes, or to refuse certification of specific products or production. In 2019, SAG delisted two establishments and suspended export certification to the United States at one establishment for three months due to sanitation issues. The FSIS auditors reviewed the documents associated with the delisting and the suspension, and verified that SAG followed the enforcement procedures described in their regulations.

Circular No. 394/2019, *Requirements for Violations in Safety and Labeling Matters (Incumplimientos Normativos en Materias de Inocuidad y Etiquetado)* mandates that establishments notify SAG within 24 hours if they have exported adulterated or misbranded products. Once notified, the Regional Director initiates an investigation. If the product has arrived at the destination market, SAG notifies the public health authorities at the destination country and provides them with the relevant export certificate number, seals, and container numbers. The FSIS auditors verified that the visited establishments maintain recall plans and regularly conduct mock recall tests. There have not been any recalls since the last FSIS audit in 2018.

Resolution No. 1722 states that SAG only grants export certificates when their inspection determines that products and by-products of animal origin are fit for human consumption. Resolution No. 2592, *Requirements for the Inspection and Certification of Products and By-products of Animal Origin for Export (Requisitos para la Inspección y Certificación Sanitaria de Exportación de Productos y Subproductos Comestibles de Origen Animal)* requires that inspected and passed products be marked “SAG Inspected and Approved (*Inspeccionado y Aprobado SAG*)”. The procedure I-CER-ECS-PP-001, *Instructions for Issuing and Annuling Export Certificates (Emisión Anulación de Certificados Zoosanitarios)*, provides instructions for issuing export certificates and voiding previously issued certificates. I-CER-ECS-PP-001 states that only MVIOs are authorized to certify export certificates.

SAG utilizes an electronic system called *Emisión Certificados Zoosanitarios Electrónicos* (ECZE) for managing the export certification process for lots that are eligible for export. The export certificates are then printed on paper with unique serial numbers. The government inspector enters the serial number for the export paper and the seal into the ECZE system, which does not allow the same serial number to be used more than once. The FSIS auditors verified that the export certificate paper and seals are stored in a locked cabinet at the inspection offices within the establishments, under the control of the MVIOs. The MVIOs review lot information, including verifying compliance with market requirements and confirmation of acceptable results for official and establishment testing for microbial adulterants prior to authorizing the lot; however, the MVIOs do not review and confirm acceptable results from routine chemical residue testing prior to authorizing the lot. The establishments eligible to export to the United States only slaughter animals born and raised in Chile and do not use raw materials from other countries.

The FSIS auditors confirmed that SAG verifies the establishments’ system for traceability from the farm of origin through processing and distribution of products. The FSIS auditors verified that the government inspectors conduct verification activities to ensure adulterated and misbranded products are not prepared for export and that FSIS import requirements are met prior to certifying product for export to the United States, except for the following finding:

- The CCA does not have a mechanism or procedure in place that requires that livestock carcasses and parts subjected to routine chemical residue testing be precluded from export to the United States until receipt and confirmation of acceptable testing results.

SAG officials remain informed about changes to FSIS requirements through official communication from Chile's agricultural attaché in the United States, a subscription to updates on the FSIS website, and direct notification from FSIS. SAG utilizes an electronic document management system called *Cero Papel* to communicate requirements throughout all levels of their meat and poultry inspection system. *Cero Papel* includes controls to determine which employees have opened the transmitted information. In this manner the SRICs can ensure that the MVIOs at each eligible establishment are informed. The FSIS auditors reviewed records at regional, sectorial, and establishment level offices to verify that *Cero Papel* was regularly utilized. Through interviews, the FSIS auditors verified that the government inspectors were knowledgeable of FSIS import requirements.

SAG is responsible for hiring all government inspectors and require appropriate credentials, including that all MVIOs have a degree from a recognized veterinary medical school. Prior to being hired by SAG, MVIOs are required to complete a meat and poultry inspection course, *Curso de Inspección Médico Veterinaria de Carnes*, that is offered at four Chilean universities. SAG utilizes training courses appropriate to duties at the central, regional, and sectorial levels, as well as on-campus and electronic training courses, to ensure that all government inspectors receive adequate ongoing training. Relief government inspectors receive the same initial and ongoing training as full-time government inspectors. MVIOs must complete training on exports and FSIS import requirements prior to certifying exports destined to the United States. Additionally, MVIOs must complete training courses on SAC (quality assurance system) verification prior to performing these tasks.

The FSIS auditors reviewed the MVIOs' notarized veterinary degrees and their certificates of completion for the meat and poultry inspection course. The FSIS auditors also verified that the designated MVIOs who conduct export certification at the visited establishments have completed training on FSIS import requirements and SAC verification. The FSIS auditors reviewed attendance lists for training conducted by SAG in 2019 and 2020, including training on the applicable parts of 9 CFR, zero tolerance verification, SAC verification, humane handling and animal welfare, and ante-mortem and post-mortem inspection of livestock and poultry.

All government inspectors receive payments directly from SAG's financial department through direct deposit. MVIOs and TIOs are employed on an annual fixed term by SAG through the ratification of their employment contracts. Continued employment is partially dependent upon successful performance evaluations by each employee's direct supervisor. The employee agrees to prevent any conflict of interest in their duties as a public servant when they sign the employment contract. The FSIS auditors verified that the government inspectors receive payment directly from SAG by reviewing pay stubs, and they also confirmed that the government inspectors were employees of SAG by reviewing employment contracts.

SAG implements procedures to maintain adequate staffing at each establishment eligible to export to the United States to ensure official inspection coverage of every slaughter period and during every shift requiring inspection. Resolution No. 2592 states that every establishment authorized to export shall be subjected to the inspection of SAG. In accordance with Memo No. 236, *Guide to the Application of the Inspection Fee at Meat Slaughter Establishments for Export*

(*Instructivo para la Aplicación de la Tarifa por la Inspección en Plantas Faenadoras de Carnes Exportadas*), the daily distribution of the hours and days to be worked at each eligible establishment is determined in each region by the Regional Director together with the JEIO and the establishment.

The FSIS auditors reviewed documented staffing records at the regional and sectorial offices, observed government staffing levels at the establishments, and confirmed that SAG is ensuring sufficient staffing to perform inspection and verification tasks at the establishments eligible to export to the United States during all operations requiring inspection. SAG maintains oversight of the national reference laboratories for microbiology and chemical residue analyses. SAG utilizes official laboratories that belong to either SAG or MINSAL, and SAG authorizes accredited private laboratories to perform official *Salmonella* and chemical residue analyses. SAG's procedure D-GF-CGP-PT-012, *Specific Regulation for the Authorization of Laboratories (Reglamento Específico Para la Autorización de Laboratorios de Análisis/ Ensayos)*, requires private laboratories to have a Quality Management System based on International Organization for Standardization (ISO) 17025, *General Requirements for the Competence of Testing and Calibration Laboratories*.

The national accrediting organization, the National Standardization Institute (*Instituto Nacional de Normalización* [INN]), conducts initial accreditation audits as well as ongoing audits every 18 months to verify compliance with ISO 17025 standards. SAG ensures that only approved analytical methods are used for analyses of official samples. Quality assurance staff from the SAG Central Laboratory are responsible for assessing the performance of approved laboratories, including conducting annual audits.

Each approved laboratory is required to conduct proficiency testing annually, and results are reported to SAG. The FSIS auditors reviewed the most recent INN audit reports for the microbiology and residue sections of the SAG Central Laboratory and verified that all corrective actions were completed and accepted. The FSIS auditors also reviewed reports of audits conducted by SAG at all the official and authorized microbiological and residue laboratories, and the FSIS auditors verified the SAG audits were conducted at the required frequency, and that SAG required and verified corrective actions in response to their findings. Through review of accreditation certificates, the FSIS auditors verified that the authorized laboratories comply with ISO 17025 standards.

The FSIS auditors reviewed training records and verified the laboratory analysts receive initial training and ongoing training whenever there is a change in a procedure in order to remain competent in the analytical methods they perform. The SAG Central Laboratory participates in microbiological proficiency testing for *Salmonella*, *Campylobacter* and *E. coli* O157:H7 annually and participated in proficiency testing for STEC in 2016. The SAG Central Laboratory participates in residue proficiency testing six times a year. The FSIS auditors reviewed results from proficiency tests and identified no concerns.

The SAG Central Laboratory conducts testing for species and pathogens other than *Salmonella* for all establishments eligible to export to the United States. The SAG Central Laboratory sends results from these analyses to the regional offices, the heads of the inspection teams (JEIOs), and

the establishments. The authorized chemical residue laboratories send results of the residue analyses to SAG headquarters to be reviewed by the pharmaceutical chemist to determine if the results comply with the national tolerable limits as well as the tolerable limits for the markets to which the establishment is eligible to export. The pharmaceutical chemist sends the results to the regional office so the SRIC can upload them into an electronic residue sample management system. If the result exceeds the acceptable limit for a market, the pharmaceutical chemist will send an email to SAG headquarters, the Regional Director, and the SRIC identifying the ineligible markets. The FSIS auditors reviewed the chain of emails related to a sample that exceeded acceptable residue limits for the United States, and verified that the pharmaceutical chemist notified the appropriate personnel that the affected product was ineligible for export to the United States and that the Regional Director notified the EIO.

The FSIS auditors concluded that SAG continues to organize, administer, and enforce its meat and poultry inspection system in a manner that meets the core requirements for this component, except that SAG does not require that livestock carcasses and parts subjected to routine chemical residue testing be precluded from export to the United States until receipt of acceptable results.

**V. COMPONENT TWO: GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (e.g., INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING)**

The second of six equivalence components the FSIS auditors reviewed was Government Statutory Authority and Food Safety and Other Consumer Protection Regulations. The system is to provide for humane handling and slaughter of livestock; ante-mortem inspection of animals; post-mortem inspection of each and every carcass and parts; controls over condemned materials; controls over establishment construction, facilities, and equipment; at least once per shift inspection during processing operations; and periodic supervisory visits to official establishments.

The FSIS auditors confirmed the EIO verifies once a week by direct observation and every six months through records review that livestock are handled and slaughtered humanely in accordance with Circular No. 393/2019, *Animal Welfare Verification in Slaughter Establishments Registered in LEEPP (Verificación de Bienestar Animal en Establecimientos Faenadores Inscritos en el LEEPP)*. Ante-mortem inspection is conducted daily on all animals, and Circular No. 393/2019 requires inspection personnel to take regulatory action if a non-compliance is observed outside established verification frequency or during other inspection activities. The EIO also verifies that the facilities are constructed and maintained in a way to avoid injuries, floors are maintained to provide good footing, animals are moved in a manner to minimize the risk of injury, and animals always have access to water and feed, when applicable. Furthermore, the EIO confirms humane slaughter by verifying that animals are rendered unconscious before slaughter and immediately bled out after stunning. Additionally, non-ambulatory livestock undergo emergency slaughter and are ineligible for export to the United States.

At the poultry slaughter and processing establishments, the FSIS auditors confirmed that the EIO certifies that poultry are slaughtered using good commercial practices. The EIO visits the areas from receiving through pre-scald to verify that birds are handled in a manner to minimize excitement, discomfort, and accidental injury. The results of the verification are recorded on the monitoring verification forms maintained in the local inspection offices. The FSIS auditors determined that the verification procedures employed by the EIO related to humane handling and slaughter of livestock and good commercial practices in poultry were in accordance with SAG's requirements.

SAG's requirements for the ante-mortem and post-mortem inspection of livestock and poultry are described in I-CER-VPE-PP-001, *Inspection in Slaughterhouse Establishments (Inspección en Establecimientos Faenadores)*. The FSIS auditors verified that MVIOs are required to conduct ante-mortem inspection on every lot, including verification of animal health and farm of origin. Each establishment is required to provide adequate lighting for ante-mortem inspection and designate a suspect pen to keep sick or injured animals separate. The only animals eligible for slaughter are the ones that have received ante-mortem inspection and have been properly identified on the pen cards. Cattle and sheep showing neurological symptoms are to be humanely slaughtered and samples are collected from their brain tissues for BSE and transmissible spongiform encephalopathy testing and then the carcasses are either buried or incinerated.

SAG requires post-mortem inspection procedures to be performed by the EIO in accordance with General Technical Standard No. 62, *Veterinary Medical Inspection of Livestock and Their Meat (Inspección Médico Veterinaria de Reses y Sus Carnes)* and General Technical Standard No. 117, *Veterinary Medical Inspection of Poultry and Poultry Meat (Inspección Médico Veterinaria de Aves de Corral y de Sus Carnes)*. The FSIS auditors verified that the EIOs are adequately trained in performing their online post-mortem inspection duties. The FSIS auditors evaluated the implementation of post-mortem inspection examinations through review of inspection records, interviews, and observations of post-mortem inspection activities at the nine visited slaughter establishments. The FSIS auditors observed and verified that proper presentation and identification of each head, carcass, and accompanying viscera are being implemented. The FSIS auditors verified that the EIO in the livestock establishments used incision, observation, and palpation to make disposition decisions based on General Technical Standard No. 62. The FSIS auditors also determined that the EIOs in one poultry establishment were not inspecting the internal and external surfaces of carcasses to make disposition decisions, as required by General Technical Standard No. 117. The FSIS auditors identified the following finding:

- Government inspectors did not observe the interior of the poultry carcasses during post-mortem inspection. The incomplete observation of the interior of the carcass is a repeat finding from the 2018 audit.

The FSIS auditors reviewed records maintained at SAG headquarters, one regional office, one sectorial office, and at each of the visited establishments. The FSIS auditors verified that SAG provides appropriate oversight and direction to the EIOs for them to use their regulatory authority to enforce requirements for Chile's meat and poultry inspection system. The SRIC assesses the adequacy of the design and implementation of the food safety programs maintained



by the establishments eligible to export to the United States by evaluating the performance of the EIO's inspection activities, verification of the SAC, and export certification in accordance with I-CER-CER-PP-001, *Supervision to the Livestock Programs of SAG (Supervisión a los Programas Pecuarios del SAG)*. The FSIS auditors reviewed the supervisory reports from 2019 and confirmed that they were conducted at a minimum of four times a year and included evaluation of the implementation of the meat and poultry inspection system and evaluation of the performance of government inspectors. The JEIO documents corrective actions in response to the findings and the SRIC verifies the corrective actions during the next supervisory review. The FSIS auditors confirmed through records review that corrective actions were taken by the JEIO and verified by the SRIC.

The FSIS auditors verified that the SRIC conducts performance appraisals of the JEIOs once a year, and that the JEIOs conduct performance appraisals of the MVIOs and TIOs once a year as well. The results of these appraisals are documented on a standardized form entitled *Evaluation of Official SAG Inspectors (Evaluación de Inspectores Oficiales SAG)*. Only significant findings are detailed in the report. Unsatisfactory performance is addressed through retraining of poor performers and follow-up supervisory review. The FSIS auditors reviewed performance appraisals for the JEIOs, MVIOs, and TIOs and had no concerns.

SAG requires establishments to maintain the identity of products and to control and segregate products eligible to be exported to the United States from products not eligible to be exported to the United States. Through observation and interviews, the FSIS auditors confirmed that SAG ensured a complete separation of United States-eligible products from ineligible products by space or time in the coolers and freezers. The ECZE system is used by both industry and government inspectors to manage product lots, including all traceability and other supporting documents. The MVIOs evaluate each request for export to ensure that the documentation supports eligibility, and official inspection personnel reinspect export lots at the time of loading. If the MVIOs determine that the export lot meets all requirements, including eligibility of product, they generate an export certificate with a unique number through the ECZE system. The FSIS auditors verified in each visited establishment the official inspection security of controls associated with the export process, including certification records, security paper, and official seals.

SAG requires establishments eligible to export to the United States to provide a copy of the sketch of the label approved by FSIS or support for a generically approved label in addition to a copy of the actual label to the EIO as described in Circular No. 360/2019, *Product Labeling for Export to the United States (Etiquetado de Producto para Exportar a Estados Unidos)*. The FSIS auditors observed the EIOs verifying that FSIS labeling requirements were being met on a shipment that was prepared for export. The FSIS auditors observed the EIOs matching the approved label with the label on the products and ensuring that the labels include all required features. The FSIS auditors reviewed the approved FSIS labels as well as all generically issued labels on file at the local inspection offices and ensured that the information on the product labels was complete, accurate, and met FSIS labeling requirements. Through a records review, the FSIS auditors confirmed that the EIOs conduct label verification on representative samples of each shipment destined for export to the United States. If the labels are not compliant, the EIOs reject the shipment and issue a noncompliance record. The FSIS auditors confirmed that the

EIOs verify that the FSIS labeling requirements are met and document the results of their verification on the F-CER-VCP-PP-004, *List of Inspection Verification for Export (Lista de Verificación de Inspección para la Exportación)*.

The EIOs conduct official verification of species once a year in accordance with I-PP-IT-IV, *Instructions for Official Verification of Species in Meats and Cured Meat for Export (Instructivo para la Verificación Oficial de Especie en Carnes y Cecinas para Exportación)*. The species testing is conducted at the SAG Central Laboratory. The FSIS auditors reviewed results of the species testing from 2018 and 2019 and confirmed that all were positive for the appropriate species.

SAG is notified of changes or updates to APHIS restrictions through Chile's agricultural attaché in the United States or directly from the APHIS website, as well as from information provided by members of the WTO based on the *Agreement on the Application of Sanitary and Phytosanitary Measures*. In case of any updates or changes to APHIS restrictions, SAG personnel in headquarters communicate with the SAG regional offices, so that they relay the information to the EIOs and the eligible establishments.

The control of condemned materials is accomplished through the application of General Technical Standard Nos. 62 and 117, which require that condemned products such as organs, viscera, carcasses, or parts be destroyed or subjected to treatments approved by the health authority and used exclusively for non-feeding industrial purposes, under the supervision and direct responsibility of the MVIOs. Through records review and direct observation, the FSIS auditors verified the appropriate identification of inedible or condemned materials; segregation in color-coded, specially marked or otherwise secure containers; and documentation of final disposal of these materials at rendering facilities.

SAG has the legal authority to establish regulatory controls over certified meat and poultry establishments that export their products to the United States. However, SAG did not implement corrective actions in response to previous audit findings to ensure that the post-mortem inspection of poultry meets FSIS requirements.

## **VI. COMPONENT THREE: GOVERNMENT SANITATION**

The third of six equivalence components the FSIS auditors reviewed was Government Sanitation. The FSIS auditors verified that SAG requires each official establishment to develop, implement, and maintain written sanitation standard operating procedures (sanitation SOP) to prevent direct product contamination or insanitary conditions.

The EIOs conduct sanitation verification according to D-PP-IT-003, *Verification of the Quality Assurance System in Export Slaughter Establishments (Verificación del Sistema de Aseguramiento de Calidad en Establecimientos Faenadores de Exportación)*. The FSIS auditors verified that SAG requires establishments that are eligible to export to the United States to develop, implement, and maintain written procedures to prevent the contamination of carcasses throughout the entire slaughter and dressing operation. As a result, slaughter establishments have implemented procedures to prevent potential carcass contamination, including sanitary hide

removal practices, avoiding direct contact between carcasses during dressing procedures, and tying the bung and esophagus to prevent contamination with gastrointestinal contents during evisceration. The JEIO, in consultation with the SRIC, develops a monthly verification schedule that includes verification of sanitary dressing procedures, sanitation performance standards (SPS), and sanitation SOPs. The FSIS auditors verified that the EIOs conduct sanitary dressing verification procedures to ensure that each slaughter establishment adheres to sanitary dressing principles at the frequencies stated in the monthly verification schedule.

The FSIS auditors confirmed that SAG requires establishments to develop procedures to address sanitary requirements including cleaning, facility construction and maintenance, equipment maintenance, and pest control consistent with the FSIS regulations for SPS outlined in 9 CFR 416.2-416.6. The FSIS auditors confirmed that the EIOs conduct SPS verification procedures at the frequency stated in the monthly verification schedule. Verification activities consist of a combination of document reviews, observations, and hands-on inspection. The FSIS auditors reviewed inspection records and verified that the EIOs identify and document SPS noncompliance and verify that the establishments perform corrective actions.

At the visited livestock slaughter establishments, the FSIS auditors confirmed that the government inspectors conduct daily zero tolerance verification of carcasses to make sure they are not contaminated with fecal material, ingesta, or milk. The FSIS auditors also reviewed the records associated with the verification of zero tolerance and found no concerns. At the visited poultry slaughter establishments, the FSIS auditors confirmed that, twice a day, government inspectors verify zero tolerance on poultry carcasses after the final wash and before the chilling tank, to certify that the establishment's process produces product free of visible fecal contamination. Through records review, the FSIS auditors verified that the government inspectors document the results of their zero tolerance verification task and had no concerns.

SAG requires establishments eligible to export to the United States to develop, implement, and maintain daily pre-operational and operational sanitation SOPs sufficient to prevent direct contamination or adulteration of meat and poultry products according to Resolution No. 1045. The EIOs perform daily verification of pre-operational and operational sanitation SOPs. At two of the visited establishments, the FSIS auditors assessed the adequacy of pre-operational sanitation SOPs by observing the EIOs conducting pre-operational verification of the establishments' sanitation SOPs. The FSIS auditors verified that the EIOs conducted this activity in accordance with the established procedures, including a pre-operational record review of the establishments' monitoring results and an organoleptic inspection of food contact surfaces of facilities, equipment, and utensils, as well as an assessment of SPS requirements.

The FSIS auditors observed the EIOs performing operational sanitation SOP verification in all visited establishments. The inspection verification activities included direct observation of the actual operations and review of the establishments' associated records. The FSIS auditors verified that inspection and establishment records mirrored the actual sanitary conditions of the establishments. The FSIS auditors also examined the EIOs' documentation of sanitation SOP noncompliance records and verified that the inspection personnel took regulatory enforcement control actions sufficient to ensure that sanitary conditions were restored, and product was protected from contamination.

The FSIS auditors' observations and record reviews, including the establishments' sanitation monitoring and corrective action records, government inspectors' documentation of inspection verification results, and periodic supervisory reviews, indicate the EIOs are adequately verifying that establishments comply with sanitation requirements. SAG's meat and poultry inspection system has an effective enforcement program that includes suspension and withdrawal of inspection for those establishments that fail to prevent product contamination or fail to take corrective actions.

Isolated noncompliances related to the verification of sanitation requirements are noted in the individual establishment checklists provided in Appendix A of this report. The FSIS analysis and onsite verification activities indicate that SAG's meat and poultry inspection system continues to maintain sanitary regulatory requirements that meet the core requirements for this component

## **VII. COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM**

The fourth of six equivalence components the FSIS auditors reviewed was Government HACCP System. The food safety inspection system is to require that each official establishment develop, implement, and maintain a HACCP system.

The FSIS auditors verified that SAG requires establishments eligible to export to the United States to design, implement, and maintain HACCP systems as required by Resolutions Nos. 2592 and 1045 and the evaluation standards for meat in F-PP-IT-047 and for poultry in F-PP-IT-058. This includes a flow chart, hazard analysis, HACCP plan, intended use of product, monitoring and verification activities, corrective actions, reassessment, and records supporting the implementation of the HACCP system. In addition, SAG requires establishments to maintain documents supporting the decisions made in their hazard analysis and HACCP plan, including the validation of their HACCP system.

The EIOs conduct verification activities for HACCP requirements according to D-PP-IT-003. The FSIS auditors reviewed records associated with the EIOs' verification of compliance with HACCP requirements and verified that the EIOs conduct daily verification of the establishments' critical control points (CCP) to ensure the adequacy of their food safety controls. The FSIS auditors also verified that the EIOs conduct daily verification of zero tolerance for fecal material, ingesta, and milk in livestock and fecal material in poultry. The FSIS auditors reviewed the establishments' flow charts and hazard analyses to verify that they identify food safety hazards that are reasonably likely to occur in their production processes and their HACCP plans include CCPs to control those hazards. Through records review and direct observation, the FSIS auditors verified that the establishments eligible to export to the United States identify microbiological hazards associated with fecal material, ingesta, and milk as reasonably likely to occur and implement CCPs to control those hazards. The FSIS auditors also reviewed the establishments' HACCP plans to verify that they list the CCPs, critical limits, procedures, and corrective actions, and that they reviewed documentation supporting implementation of the establishments' HACCP systems. The FSIS auditors confirmed that the MVIOs verify that establishments eligible to

export to the United States review records associated with the production of product for export to the United States to ensure that all HACCP requirements are met prior to shipping the product into commerce. However, the FSIS auditors identified the following findings related to design and implementation of the HACCP systems:

- Government inspectors did not verify that the hazard analyses addressed chemical hazards associated with restricted ingredients (e.g., sodium phosphate and potassium phosphate).
- Government inspectors did not verify the HACCP plans complied with the CCA's requirements for HACCP plan content.
- Government inspectors did not verify the establishments complied with the CCA's requirements for HACCP recordkeeping.

The FSIS auditors determined that SAG requires operators of establishments certified to export to the United States to develop, implement, and maintain HACCP systems; however, the audit findings listed above demonstrate that SAG's meat and poultry inspection system did not effectively verify the adequacy of HACCP systems at some of the establishments certified to export to the United States.

## **VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS**

The fifth of six equivalence components the FSIS auditors reviewed was Government Chemical Residue Testing Programs. The food safety inspection system is to present a chemical residue testing program, organized and administered by the national government, which includes random sampling of internal organs, fat, and muscle of carcasses for chemical residues identified by the exporting country's meat and poultry products inspection authorities, or by FSIS, as potential contaminants.

Prior to the onsite visit, FSIS residue experts reviewed Chile's national Residue Control Program (*Programa de Control de Residuos* [PCR]) for 2019, associated methods of analysis, and additional SRT responses outlining the structure of Chile's chemical residue testing program.

Through Law No. 18755, *Rules on the Agricultural and Livestock Service (Normas sobre el Servicio Agrícola y Ganadero)*, SAG has the legal authority and responsibility to develop and implement an annual PCR aimed at preventing and controlling the presence of residues of veterinary drugs and contaminants in the tissues of livestock and poultry slaughtered for human consumption. The PCR is designed to comply with the requirements of all countries that import meat and poultry products from Chile and provides evidence-based information on the presence of chemical residues in livestock and poultry. In addition, the data the PCR generates allows SAG to identify developing trends and implement corrective actions, if necessary.

Suppliers of animals destined for slaughter are required to comply with government regulations that apply to the use, manufacturing, importing, and selling of veterinary drugs prohibited for use in animals destined for human consumption. For veterinary drugs that are permitted in primary production, the PCR establishes maximum tolerance levels, analytical methods, and sampling

protocols to be implemented throughout the year at farms and establishments to verify compliance with equivalent requirements.

The official monitoring is conducted according to the PCR, which is developed every year. The FSIS auditors verified the implementation of the PCR at the nine visited slaughter and processing establishments. A review of the sample records maintained at the inspection offices within the establishments indicated that the 2019 sampling program was adhered to as scheduled. The FSIS auditors verified that the MVIOs follow the instructions outlined in I-CER-VPE-PP-006, *Collection and Shipping of Samples to the Laboratory for the Residue Control Program in Slaughter Establishments (Toma y Envío de Muestras a Laboratorio para el Programa de Control de Residuos en Establecimientos Faenadores)*, which describes the collection, security, storage, and dispatchment of residue samples.

The PCR includes the species, analytes, analytical methods, matrix, number of samples, as well as the detection and the action limits. The FSIS auditors verified that the SRIC assigns residue samples weekly to the MVIOs at the establishments eligible to export to the United States using the electronic Analysis Management System (*Sistema de Gestión de Análisis [SGA]*). The MVIOs log into the SGA and retrieve the form detailing the protocol for the collection and shipping of the sample to the laboratory, including the date range for collection of the sample, shipping medium, species, requested analysis, and the laboratory processing the sample. The MVIOs input the farm origin, lot number, and date of shipment into the SGA. Once samples are collected, the government inspector completes the laboratory submission form and inserts a copy into the sample shipment cooler, which is secured with a numbered inspection seal to maintain integrity. The sample is then transported either by official courier to the laboratory or dropped off by a government inspector to the laboratory. Residue results are communicated to SAG headquarters through email. After that, the results are entered into the SGA system and made available to the MVIOs.

Through interviews and records review, the FSIS auditors confirmed that, in the event of a violative sample, the Livestock Protection Division, through the Regional Director, informs the MVIOs at the establishment, as well as the farm of origin and immediately suspends the certification of all exports from that establishment. Then the Regional Director opens an investigation, enters the farm or sector of origin into a direct monitoring system, and collects five samples on the following slaughter day. If the results of the samples are negative, the Regional Director lifts the suspension of certification. However, if the results are positive, the suspension remains in place until the farm brings itself into compliance through corrective actions.

The FSIS auditors conducted an onsite audit of the SAG Central Laboratory, the national reference laboratory that provides technical support to Chile's meat and poultry inspection system. This laboratory is required to be audited by INN to verify compliance with ISO 17025 standards. The documents reviewed at the laboratory demonstrated the technical and organizational functions were periodically evaluated by the laboratory quality control manager. Findings reported during INN audits were promptly addressed and documented. The FSIS auditors reviewed the accreditation documents and verified that the SAG Central Laboratory was audited by INN every 18 months.

The FSIS auditors verified that analysts assigned to the SAG Central Laboratory have completed academic work and specialized training that qualify them to conduct the analytical methods for detection and quantification of chemical residues in their scope of accreditation. The FSIS auditors verified that the SAG Central Laboratory ensures traceability throughout sample receipt, analysis, and reporting per their laboratory quality control manual. The FSIS auditors verified that the SAG Central Laboratory performs timely analysis of samples and reports the number of analyzed samples and the results to SAG headquarters in a timely manner. The FSIS auditors also verified that the quality control manual included organization, staff, qualifications, credentials, and training. No concerns arose from these observations and reviews.

The FSIS auditors also verified that SAG has implemented the corrective actions associated with the 2018 FSIS audit finding regarding the collection of secondary and tertiary samples prior to confirming a positive primary sample. The FSIS confirmed through records review and interviews that the SAG Central Laboratory currently only analyzes the primary residue sample from sets of samples collected from carcasses and parts eligible to export to the United States.

The FSIS auditors verified that Chile's meat and poultry inspection system continues to maintain a chemical residue testing program organized and administered by the national government. SAG maintains the legal authority to regulate, plan, and execute activities of the inspection system that are aimed at preventing and controlling the presence of residues of veterinary drugs and contaminants in meat and poultry products destined for export to the United States. FSIS has not identified any POE violations related to this component since the last FSIS audit in 2018.

## **IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS**

The last equivalence component the FSIS auditors reviewed was Government Microbiological Testing Programs. The food safety inspection system is to implement certain sampling and testing programs to ensure that meat and poultry products prepared for export to the United States are safe and wholesome. The FSIS auditors reviewed the programs implemented by SAG as part of its pathogen reduction program outlined in D-CER-VPE-PP-009, version 2, *General Document of Microbiological Verification in Export Livestock Establishments (Verificación Microbiológica Oficial en Establecimientos Pecuarios de Exportación)* that includes generic *E. coli* and *Salmonella* sampling, as well as SAG's STEC control programs.

The procedure D-CER-VPE-PP-009 addresses the collection, analysis, and verification of generic *E. coli* in livestock and poultry slaughter establishments. The establishment is responsible for collecting generic *E. coli* samples of livestock and poultry carcasses, and all samples are required to be analyzed in official or authorized laboratories using the Association of Analytical Chemists 991.14 or 998.08 analytical methods. The generic *E. coli* results are emailed to the JEIOs, the Livestock Protection Division and the establishments. The JEIOs in each establishment review the statistical process control charts in order to verify whether the establishments' processes are in control. The FSIS auditors reviewed the generic *E. coli* results and verified that the methodology, sampling frequency, and tolerable limits complied with D-CER-VPE-PP-009.

The FSIS auditors confirmed that government inspectors were verifying that poultry slaughter establishments eligible to export to the United States monitored the effectiveness of their process control procedures by testing chicken and turkey carcasses for indicator organisms at pre-chill and post-chill. Furthermore, the FSIS auditors also verified that all poultry establishments have developed, implemented, and maintained written microbiological sampling procedures as part of their SAC to prevent contamination of carcasses and parts by enteric pathogens and fecal material throughout the entire slaughter and dressing operations, as required by SAG. Through records review, the FSIS auditors confirmed that government inspectors verify the microbiological sampling procedures once a week through direct observation or records review, and the FSIS auditors had no concerns.

SAG has established *Salmonella* performance standards for livestock and poultry as described in D-CER-VPE-PP-009. The EIOs are responsible for collecting five samples from livestock and poultry carcasses each week for *Salmonella* testing. The five samples are collected on the same day. Livestock and turkey carcasses are sampled using the sponge method and chickens are sampled using a whole bird rinse method. Samples are submitted to official and authorized laboratories, which screen samples for the presence of *Salmonella* using the VIDAS® Easy SLM methodology and confirm screen positive results using the method in ISO 6579-1:2017, *Microbiology of the Food Chain - Horizontal Method for the Detection, Enumeration and Serotyping of Salmonella - Part 1: Detection of Salmonella spp.* The Livestock Protection Division, the JEIO, and the establishment receive *Salmonella* results directly from the official and authorized laboratories. The Livestock Protection Division then notifies the regional office if there is a concern with the results. In the event an establishment fails a 50-sample set, SAG requires the establishments to provide corrective actions within 72 hours.

The FSIS auditors reviewed the official *Salmonella* sampling procedures and results at the visited establishments, and the FSIS auditors verified through document review and observation that the methodology, sampling frequency, and tolerable limits complied with D-CER-VPE-PP-009, except for one beef establishment in 2019 that had three carcasses test positive out of a 50-sample set, and therefore the establishment did not comply with SAG's *Salmonella* performance standards. In this case, the three positives were collected from the same production lot. The FSIS auditors reviewed the documents related to that failed *Salmonella* set and verified that the authorized laboratory sent an email to the JEIO, the Livestock Protection Division, and the establishment. The JEIO issued a noncompliance report for the establishment's failure to meet SAG's *Salmonella* performance standards. The establishment implemented corrective actions and determined that all affected product remained in the establishment, and the establishment management elected to condemn all affected product. SAG conducted intensified *Salmonella* sampling in accordance with its documented procedures. The results of the intensified sampling were acceptable; therefore, SAG no longer considered the establishment to be noncompliant.

As described in D-CER-VPE-PP-009, SAG requires inspectors to take samples for official STEC testing at establishments eligible to export non-intact beef products or intact beef products intended for non-intact use and SAG requires inspectors to take samples of raw ground beef products for *E. coli* O157:H7 testing. In addition, SAG requires establishments to sample and test non-intact beef products or intact beef products intended for non-intact use for non-O157 STEC and *E. coli* O157:H7 and raw ground beef products for *E. coli* O157:H7. For non-intact



beef products or intact beef products for non-intact use, the sample is collected using the N60 methodology. The SAG Central Laboratory performs the official STEC analyses. The Livestock Protection Division sends the results to the SRIC, the JEIO, and the establishment. The JEIO places a hold on the sampled lots, pending confirmation of acceptable results, in the ECZE system.

The FSIS auditors verified that the visited heat-treated NRTE establishments were following the *FSIS Compliance Guideline for Stabilization (Cooling and Hot-Holding) of Fully and Partially Heat-Treated RTE and NRTE Meat and Poultry Products Produced by Small and Very Small Establishments* to prevent the outgrowth of *Clostridium (C.) perfringens* and *C. botulinum*. The heat-treated product is immediately placed in an individual quick-freezing tunnel for 30 to 45 minutes and comes out at -18 ° Celsius and then moved to a freezer for storage. SAG requires that establishments exporting NRTE products to the United States meet the requirements consistent with 9 CFR 381.125. The FSIS auditors reviewed labels for heat-treated NRTE poultry products and verified that they contain validated cooking instructions. Additionally, the FSIS auditors confirmed through records review that the EIOs verify that the labels on products destined to the United States meet FSIS import requirements, including validated cooking instructions on heat-treated NRTE products, before signing export certificates.

The Government Microbiological Testing Programs component of Chile's meat and poultry inspection system is organized and administered by SAG to verify that meat and poultry products destined for export to the United States are unadulterated, safe, and wholesome in accordance with FSIS import requirements. There have not been any POE violations related to this component since the last FSIS audit in 2018.

## **X. CONCLUSIONS AND NEXT STEPS**

An exit meeting was held January 28, 2020, in Santiago, Chile, with SAG. At this meeting, the FSIS auditors presented the preliminary findings from the audit. An analysis of the findings within each component did not identify any deficiencies that represented an immediate threat to public health. The FSIS auditors identified the following findings:

### **GOVERNMENT OVERSIGHT (e.g., ORGANIZATION AND ADMINISTRATION)**

- The CCA does not have a mechanism or procedure in place that requires that livestock carcasses and parts subjected to routine chemical residue testing be precluded from export to the United States until receipt and confirmation of acceptable testing results.

### **GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS**

- Government inspectors did not observe the interior of the poultry carcasses during post-mortem inspection. The incomplete observation of the interior of the carcass is a repeat finding from the 2018 audit.

## **GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM**

- Government inspectors did not verify that the hazard analyses addressed chemical hazards associated with restricted ingredients (e.g., sodium phosphate and potassium phosphate).
- Government inspectors did not verify the HACCP plans complied with the CCA's requirements for HACCP plan content.
- Government inspectors did not verify the establishments complied with the CCA's requirements for HACCP recordkeeping.

During the audit exit meeting, SAG committed to address the preliminary audit findings as presented. FSIS will evaluate the adequacy of SAG's documentation of proposed corrective actions and base future equivalence verification activities on the information provided.

# **APPENDICES**

## **Appendix A: Individual Foreign Establishment Audit Checklists**

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Agroindustrial Arica S.A. Av. Santa Maria No. 2348 Arica Región De Arica Y Parinacota	2. AUDIT DATE 01/21/2020	3. ESTABLISHMENT NO. 01-11	4. NAME OF COUNTRY Chile
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		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.	X	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.	X	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.	X	44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
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.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Chicken slaughter and processing.
Prepared Products:	Raw non-intact chicken (other non-intact).

60. Observation of the Establishment

During the visit of the establishment, government inspectors did not identify the following noncompliances:

9. Government inspectors did not verify the written Sanitation SOP program was signed and dated by an individual with overall authority at the establishment.

15. Government inspectors did not verify the hazard analysis considered chemical hazards associated with restricted ingredients. At the marination step of the Marinated Products hazard analysis, the establishment did not to identify, evaluate and control chemical hazards associated with sodium phosphate and potassium phosphate used in their production process.

15. Government inspectors did not verify the HACCP plan include ongoing verification frequencies. The Marinated Products HACCP plan did not list the frequency of the calibration of the thermometers.

17. Government inspectors did not verify the Slaughter HACCP plan, the Raw Products HACCP plan, and the Marinated Products HACCP plan included a signature and date by the responsible establishment individual.

20. Government inspectors did not verify the Slaughter HACCP plan included identification of the cause of deviations as part of the corrective actions.

20. Government inspectors did not verify the Slaughter HACCP plan included measures to prevent recurrence as part of the corrective actions.

United States Department of Agriculture  
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## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Sopraval S.A. Panamericana Norte, Km. 112 La Calera Región de Valparaíso	2. AUDIT DATE 01/24/2020	3. ESTABLISHMENT NO. 05-09	4. NAME OF COUNTRY Chile
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		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. Periodic Supervisory Reviews	
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.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Turkey slaughter and processing.
Prepared Products:	Raw non-intact chicken (other non-intact); raw intact pork (cuts); raw non-intact turkey (ground product, and other non-intact); and raw intact turkey (boneless and/or skinless parts, and poultry parts (including necks/feet & giblets)).

60. Observation of the Establishment

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



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## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Procesadora de Alimentos del Sur Limitada Ruta H-50 Km. 0.304 Camino Quinta de Tilcoco Rengo Región Del Libertador General Bernardo O'Higgins	2. AUDIT DATE 01/17/2020	3. ESTABLISHMENT NO. 06-06	4. NAME OF COUNTRY Chile
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		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.	X	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.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
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.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Pork slaughter and processing.
Prepared Products:	Raw intact pork (cuts, edible offal, and primals and subprimals).

60. Observation of the Establishment

During the visit of the establishment, government inspectors did not identify the following noncompliances:

9. Government inspectors did not verify the written Sanitation SOP program was dated by an individual with overall authority at the establishment.
10. After observing the government inspector conduct pre-operational Sanitation SOP verification in the swine slaughter area, the FSIS auditor found fat particles, wet blood, black oil, and rust on numerous food contact and non-food contact surfaces of equipment as well as on overhead structures (white offal trays; white offals conveyor belt; at official inspection station for white and green offals; on two overhead fan guards above the line; in sink at reprocessing station; at the mirror located at the zero tolerance station) from the previous day’s production.
22. Government inspectors did not verify the HACCP records include the signature of the preshipment reviews by the responsible establishment officials.

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## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Faenadora San Vicente Ltda. Carretera H-66-G, Km. 19.2 San Vicente de Tagua Tagua Región Del Libertador General Bernardo O'Higgins	2. AUDIT DATE 01/16/2020	3. ESTABLISHMENT NO. 06-08	4. NAME OF COUNTRY Chile
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP	X	33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.	X	35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	
<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.	X	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. Periodic Supervisory Reviews	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Chicken slaughter and processing.
Prepared Products:	NRTE otherwise processed chicken (other); raw non-intact chicken (ground product, mechanically separated (species), and other non-intact); raw intact chicken (boneless and/or skinless parts, and poultry parts (including necks/feet & giblets)); raw intact pork (cuts); raw non-intact turkey (other non-intact); and raw intact turkey (boneless and/or skinless parts).

60. Observation of the Establishment

During the visit of the establishment, government inspectors did not identify the following noncompliances:

7. Government inspectors did not verify the written Sanitation SOP program included the frequency for operational Sanitation SOP monitoring by establishment personnel.
9. Government inspectors did not verify the written Sanitation SOP program was dated by an individual with overall authority at the establishment.
10. Government inspectors did not identify grease smudges on the hocks of numerous carcasses that had passed inspection.
13. Government inspectors did not verify the establishment documented results of operation Sanitation SOP monitoring in the slaughter area and freezers.
17. Government inspectors did not verify the Slaughter and Raw Intact HACCP plans included a date by the responsible establishment individual.
55. The post-mortem inspection procedures for poultry did not consistently include observation of the interior of the carcasses or palpation of the viscera. The government inspectors only put their right middle and index fingers at the opening of the cavity while holding an ink stick with the left hand to mark the birds to be reprocessed. While observation zero tolerance verification check by the government inspectors, the FSIS auditor observed numerous defects such as bruises and feathers and pinfeathers on the outside carcass as well as lungs and inflammatory process on the interior of the carcasses that had passed inspection.

United States Department of Agriculture  
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## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Matadero Frigorifico del Sur S.A. Ruta U-55 Camino Pichidamas Km. 1.7 Osorno Región de Los Lagos	2. AUDIT DATE 01/17/2020	3. ESTABLISHMENT NO. 10-15	4. NAME OF COUNTRY Chile
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		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.	X	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.	X	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.	X	47. Employee Hygiene	
20. Corrective action written in HACCP plan.	X	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
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.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	Raw intact beef (boneless manufacturing trimmings, cuts, and primals and subprimals).

## 60. Observation of the Establishment

During the visit of the establishment, government inspectors did not identify the following noncompliances:

12. Government inspectors did not verify the corrective actions taken when the operational Sanitation SOPs failed to prevent direct contamination of product included procedures to identify the cause of the contamination in order to prevent recurrence.
15. Government inspectors did not verify the Slaughter HACCP plan include ongoing verification frequencies for critical control point (CCP) 1, zero tolerance for carcasses, and CCP 2, concentration of antimicrobial solution.
19. Government inspectors did not verify the establishment performed direct observation of monitoring activities to ensure that the monitoring of CCP 2, concentration of antimicrobial solution, in the Slaughter HACCP plan was implemented effectively.
20. Government inspectors did not verify that CCP 1, zero tolerance for carcasses, in the Slaughter HACCP plan and CCP 1, metal detection, in the Deboning HACCP plan included measures to prevent recurrence as part of the corrective actions.
20. Government inspectors did not verify the alternative corrective actions in response to deviations from CCP 2, concentration of antimicrobial solution, was included in the Slaughter HACCP plan. When the concentration is above the critical limit, the concentration is reduced but no product is affected. When the concentration is below the critical limit, the concentration is increased, and the product is reprocessed.
22. Government inspectors did not verify the establishment documented corrective actions for CCP 2, concentration of antimicrobial solution, on the record identified in the HACCP plan.
22. Government inspectors did not verify the HACCP plan included identification of the cause of deviations for CCP 2, concentration of antimicrobial solution, as part of the corrective actions.
22. Government inspectors did not verify the HACCP records include the decision-making documents supporting the selection and development of critical control points (CCPs) and critical limits.
22. Government inspectors did not verify the HACCP records include the decision-making documents supporting the monitoring and verification procedures and frequencies.
45. Government inspectors did not verify the conveyor belts in the processing department used to transport edible product were maintained in a manner to prevent the creation of insanitary conditions and the potential for product adulteration. There were multiple damaged plastic conveyor belts with broken links and sharp edges.

United States Department of Agriculture  
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## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorífico de Osorno S.A. Francisco del Campo No. 200 Osorno Región de Los Lagos	2. AUDIT DATE 01/20/2020	3. ESTABLISHMENT NO. 10-26	4. NAME OF COUNTRY Chile
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	Raw intact beef (boneless manufacturing trimmings, and cuts).

60. Observation of the Establishment

During the visit of the establishment, government inspectors did not identify the following noncompliances:

10. Government inspectors did not verify the establishments implemented sanitary dressing procedures to prevent cross contamination of carcasses during steam-vacuuming. The hoses from the steam-vacuum sanitizer came into direct contact with the carcasses during steaming and were not cleaned in between carcasses.
15. Government inspectors did not verify the HACCP plan include ongoing verification frequencies. The Deboning HACCP plan did not list the frequency of the calibration of the thermometers for critical control point (CCP) 1, carcass temperature.
22. Government inspectors did not verify the HACCP records include all elements of HACCP corrective actions. The corrective actions taken after a deviation from the CCP1, zero tolerance for carcasses, of the Slaughter HACCP plan did not include measures to prevent recurrence.
52. Government inspectors did not verify the holding pens were maintained in a manner to prevent injury.



United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorífico Simunovic S.A. Km. 13.7 Norte Punte Arenas Región de Magallanes y la Antartica Chilena	2. AUDIT DATE 01/23/2020	3. ESTABLISHMENT NO. 12-01	4. NAME OF COUNTRY Chile
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		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.	X	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
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.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Lamb slaughter and processing.
Prepared Products:	Raw intact lamb (boneless manufacturing trimmings, carcass (including carcass halves or quarters), cuts, edible offal, other intact, and primals and subprimals); and raw intact mutton (carcass (including carcass halves or quarters), and cuts).

## 60. Observation of the Establishment

During the visit of the establishment, government inspectors did not identify the following noncompliances:

15. Government inspectors did not verify the HACCP plan include ongoing verification frequencies. For critical control point (CCP) 2, carcass temperature, of the Ovine Slaughter and Processing HACCP plan and the Bovine Slaughter and Processing HACCP plan, the frequency of the calibration of the thermometers was not listed as a verification activity.
22. Government inspectors did not verify the HACCP records include the time of ongoing monitoring activities for CCP1, zero tolerance for ovine carcasses.
22. Government inspectors did not verify the HACCP records include all elements of HACCP corrective actions The corrective actions taken after a deviation from the CCP1, zero tolerance for ovine and bovine carcasses, did not include the identification of the cause of the deviation.
22. Government inspectors did not verify the HACCP records include the date of the preshipment reviews by the responsible establishment officials.
22. Government inspectors did not verify the HACCP records include the decision-making documents supporting the selection and development of critical control points (CCPs) and critical limits.
22. Government inspectors did not verify the HACCP records include the decision-making documents supporting the monitoring and verification procedures and frequencies.

61. AUDIT STAFF

OIEA International Audit Branch (IAB)

62. DATE OF ESTABLISHMENT AUDIT

01/23/2020

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Soc. Com. José Marín Antonín y Cia. Ltda. (Agromarín) Los Calafates No. 0415 Sitio 7-11 Barrio Industrial Punta Arenas, Región de Magallanes y la Antártica	2. AUDIT DATE 01/22/2020	3. ESTABLISHMENT NO. 12-05	4. NAME OF COUNTRY Chile
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP	X	33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X	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.	X	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
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.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Lamb slaughter and processing.
Prepared Products:	Raw intact lamb (boneless manufacturing trimmings, carcass (including carcass halves or quarters), cuts, and edible offal); and raw intact mutton (carcass (including carcass halves or quarters), cuts, other intact, and primals and subprimals).

## 60. Observation of the Establishment

During the visit of the establishment, government inspectors did not identify the following noncompliances:

7. Government inspectors did not verify the operational Sanitation SOP included the frequency with which each procedure should be conducted.
10. Government inspectors did not verify the establishments implemented sanitary dressing procedures to prevent cross contamination of carcasses during the dehiding process.
12. Government inspectors did not verify the corrective actions taken when the operational Sanitation SOPs failed to prevent direct contamination of product include procedures to ensure appropriate disposition of product.
15. Government inspectors did not verify the Ovine Slaughter and Processing HACCP plan included ongoing verification frequencies for critical control point (CCP) 1, zero tolerance for carcasses.
15. Government inspectors did not verify the Ovine Slaughter and Processing HACCP plans included accurate monitoring frequencies.
22. Government inspectors did not verify the HACCP records include the time of ongoing monitoring activities for CCP 1, zero tolerance for carcasses.
22. Government inspectors did not verify the HACCP records included the decision-making documents supporting the selection and development of critical control points (CCPs) and critical limits.
22. Government inspectors did not verify the HACCP records included the decision-making documents supporting the monitoring and verification procedures and frequencies.

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Agroindustrial el Paico S.A. Av. Los Libertadores No. 1714 El Monte Región Metropolitana	2. AUDIT DATE 01/23/2020	3. ESTABLISHMENT NO. 13-07	4. NAME OF COUNTRY Chile
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		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.	X	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Periodic Supervisory Reviews	
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.	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Chicken slaughter and processing.
Prepared Products:	Raw non-intact chicken (ground product, and other non-intact); raw intact chicken (boneless and/or skinless parts, and poultry parts (including necks/feet & giblets)); and raw non-intact turkey (other non-intact).

60. Observation of the Establishment

During the visit of the establishment, government inspectors did not identify the following noncompliance:

15. Government inspectors did not verify the hazard analysis considered chemical hazards associated with restricted ingredients. At the marination step of the Marinated Products hazard analysis, the establishment did not to identify, evaluate and control chemical hazards associated with sodium phosphate and potassium phosphate used in their production process.

## **Appendix B: Foreign Country Response to the Draft Final Audit Report**



**CARTA N° 3416/2020**  
**SANTIAGO, 26/06/2020**

**SEÑORA**  
**MICHELLE CATLIN**  
**INTERNATIONAL COORDINATION EXECUTIVE**  
**OFFICE OF INTERNATIONAL COORDINATION FSIS – USDA**

Estimada Dra. Michelle Catlin,

Reciba un cordial saludo desde el Servicio Agrícola y Ganadero (SAG) de Chile. Por medio de la presente, quisiera agradecer el envío del borrador del informe de la auditoria realizada por el Food Safety and Inspection Service (FSIS), entre el 13 y 28 de enero de 2020, que evaluó el sistema chileno de inocuidad de los alimentos que rige la producción de productos cárnicos y avícolas destinados a la exportación a los Estados Unidos de América.

En razón de lo anterior, me permito adjuntar respuesta de la autoridad competente de Chile con las aclaraciones y acciones implementadas para corregir los hallazgos detectados

Quedo atento para responder cualquier comentario o inquietud que pueda tener.

Saludos cordiales,

**OSCAR EDUARDO VIDELA PEREZ**  
**JEFE DIVISIÓN PROTECCIÓN PECUARIA**

Incl.:	Documento Digital: Courtesy translation - Response to FSIS <a href="#">Ver</a>
	Documento Digital: Official response to US <a href="#">Ver</a>



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ECR/DRP

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Hector Daniel Galleguillos Villouta Jefe Subdepartamento de Comercio Internacional Oficina Central  
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Maria del Rosario Garcia Ugarte Profesional Subdepartamento Rubro Cárnicos Oficina Central  
David Hector Guerra Maldonado Profesional División Protección Pecuaria Oficina Central  
Horacio Bórquez Conti Director Nacional Servicio Agrícola y Ganadero Oficina Central

División Protección Pecuaria - Paseo Bulnes N° 140



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*Courtesy translation*

Santiago,

**MRS.  
MICHELLE CATLIN  
INTERNATIONAL COORDINATION EXECUTIVE  
OFFICE OF INTERNATIONAL COORDINATION  
FSIS – USDA**

Dear Dr. Michelle Catlin,

Greetings from the Agricultural and Livestock Service (SAG) of Chile. Hereby, I would like to thank you for sending the draft of the audit report carried out by the Food Safety and Inspection Service (FSIS), between January 13 and 28, 2020, in which the Chilean food safety system governing the production of meat and poultry products intended for export to the United States of America was evaluated.

Due to the aforementioned, please find the response of the competent authority of Chile with the clarifications and implemented actions to address the detected findings.

I will be glad to answer or clarify any doubt or concern that you may have.

Attentive to answer any comment or concern you may have,

Best regards,

**OSCAR EDUARDO VIDELA PEREZ  
HEAD OF  
LIVESTOCK PROTECTION DIVISION**