United States Department of Agriculture

Food Safety and
Inspection Service

1400 Independence
Avenue, SW.
Washington, D.C.
20250

March 29, 2024

Mr. Roberto Serroni Perosa
Secretary of Trade and International Affairs (SCRI)
Ministry of Agriculture and Livestock
Esplanada dos Ministérios, Bloco D, Edifício Sede, 3º andar, Sala 300
70043-900 Brasília – DF

Dear Mr. Serroni Perosa,

The United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) conducted an onsite verification audit of Brazil's inspection system September 12 - 30, 2022. Enclosed is a copy of the final audit report. The comments received from the Government of Brazil are included as an attachment to the report.

For any questions regarding the FSIS audit report, please contact the Office of International Coordination at InternationalCoordination@usda.gov.

Sincerely,

MARGARET BURNS RATH
Digitally signed by MARGARET BURNS RATH
Date: 2024.03.29 17:31:01 -04'00'

Margaret Burns Rath, JD, MPH
Acting International Coordination Executive
Office of International Coordination

Enclosure

FINAL REPORT OF AN AUDIT CONDUCTED OF

BRAZIL

EVALUATING THE FOOD SAFETY SYSTEMS GOVERNING

RAW AND PROCESSED MEAT PRODUCTS

EXPORTED TO THE UNITED STATES OF AMERICA

March 28, 2024

Food Safety and Inspection Service
U. S. Department of Agriculture

Executive Summary

This report describes the outcome of an onsite equivalence verification audit of Brazil conducted by the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) from September 12–30, 2022. The purpose of the audit was to verify whether Brazil's food safety inspection systems governing raw and processed beef and pork products remain equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. Brazil currently exports raw and processed beef and pork products 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 Department of Inspection for Products of Animal Origin (DIPOA), Brazil's Central Competent Authority does not ensure that government inspection personnel verify that ready-to-eat (RTE) products subjected to official microbiological testing for *Listeria monocytogenes* and *Salmonella* are acceptable prior to signing the export certificate. However, the FSIS auditors did not identify that any adulterated product was exported to the United States.
- DIPOA did not ensure that the audited microbiology laboratory adequately addressed nonconformities in accordance with International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025 standards. In 2020, the laboratory did not develop and implement corrective actions to address a failed proficiency test for Shiga toxin-producing *Escherichia coli* (STEC), primarily because it could not receive spiked samples from foreign suppliers with genetic material for all STEC serogroups so they could perform the test method as written.

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

- For humane slaughter reasons, DIPOA allows for the slaughter of non-ambulatory disabled cattle on the same slaughter line and at the same time as cattle eligible for the United States market. However, non-ambulatory disabled cattle are not eligible for export to the United States and their carcasses are identified and segregated at the chiller and throughout the deboning process.

During the audit exit meeting, DIPOA officials committed to address the preliminary findings as presented. FSIS will evaluate the adequacy of the DIPOA'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 Brazil's food safety inspection systems on September 12 – 30, 2022. The audit began with an entrance meeting on September 12, 2022, in Brasília, Brazil during which the FSIS auditors discussed the audit objective, scope, and methodology with representatives from the Central Competent Authority (CCA) – the Department of Inspection for Products of Animal Origin (DIPOA). Representatives from DIPOA accompanied FSIS auditors throughout the entire audit. The audit concluded with an exit meeting conducted remotely via videoconference on September 30, 2022.

II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit objective was to verify whether the food safety inspection systems governing raw and processed beef and pork products remain equivalent to those of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. Brazil is eligible to export the following categories of products to the United States:

Process Category	Product Category	Eligible Products[1]
Raw - Non Intact	Raw Ground, Comminuted, or Otherwise Non-intact Pork	Pork - All Products Eligible except Mechanically Separated and Advanced Meat Recovery Product (AMR)
Raw - Intact	Raw Intact Pork	Pork - All Products Eligible
Raw - Intact	Raw Intact Beef	Beef - All Products Eligible except Cheek Meat, Head Meat, Heart Meat, and Weasand Meat
Thermally Processed - Commercially Sterile (TCPS)	Thermally Processed, Commercially Sterile	Beef and Pork - All Products Eligible
Heat Treated - Shelf Stable	Not-Ready-to-Eat (NRTE) Otherwise Processed Meat	Beef and Pork - All Products Eligible
Heat Treated - Shelf Stable	Ready-to-Eat (RTE) Dried Meat	Beef and Pork - All Products Eligible
Fully Cooked - Not Shelf Stable	RTE Fully-Cooked Meat	Beef and Pork - All Products Eligible
Fully Cooked - Not Shelf Stable	RTE Meat Fully-Cooked Without Subsequent Exposure to the Environment	Beef and Pork - All Products Eligible

[1] All source meat used to produce products must originate from eligible countries and establishments certified to export to the United States.

The USDA, Animal and Plant Health Inspection Service (APHIS) restricts certain animal products from entering the United States because of animal disease conditions in the country of origin. Applicable APHIS animal disease requirements that may have an impact on Brazil's eligibility to export product to the United States are as follow:

- Beef imported from Brazil is subject to the bovine spongiform encephalopathy (BSE) requirements specified in Title 9 of the United States Code of Federal Regulations (9 CFR) 94.18 or 9 CFR 94.19. In addition, Brazil is affected with foot-and-mouth disease (FMD) and the importation of beef from Brazil is prohibited as per 9 CFR 94.1, except from the State of Santa Catarina, which is recognized by APHIS to be free of FMD. However, imports from Santa Catarina are subject to animal health requirements in 9 CFR 94.11.

- Fresh (chilled or frozen) beef can be imported from the States of Bahia, Distrito Federal, Espírito Santo, Goiás, Mato Grosso, Mato Grosso do Sul, Minas Gerais, Paraná, Rio Grande do Sul, Rio de Janeiro, Rondônia, São Paulo, Sergipe, and Tocantins if requirements specified in 9 CFR 94.29 are met.

- The importation of cooked and cured meats derived from ruminants originating from regions of Brazil as designated in 9 CFR 94.1 is prohibited unless conditions specified in 9 CFR 94.4 have been fulfilled.

- Pork imported from Brazil is subject to African swine fever requirements specified in 9 CFR 94.8, classical swine fever requirements specified in 9 CFR 94.32, and swine vesicular disease requirements specified in 9 CFR 94.13. In addition, Brazil is affected with FMD and is subject to animal health requirements in 9 CFR 94.4, except pork imported from the state of Santa Catarina, which is subjected to animal health requirements specified in 9 CFR 94.11.

Prior to the onsite equivalence verification audit, FSIS reviewed and analyzed Brazil's Self-Reporting Tool (SRT) responses and supporting documentation. During the audit, the FSIS auditors conducted interviews and reviewed records to determine whether Brazil's food safety inspection systems governing raw and processed beef and pork products are 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 3-year period, in addition to information obtained directly from DIPOA 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.

The FSIS auditors reviewed administrative functions at DIPOA headquarters, two regional offices, and at 12 local inspection offices within certified establishments. The FSIS auditors evaluated the implementation of controls to ensure the national system of inspection, verification, and enforcement is being implemented as documented by DIPOA in SRT responses and supporting documentation.

A sample of 12 establishments was selected from a total of 49 establishments certified by DIPOA to export to the United States. This included seven beef slaughter and processing establishments, one pork slaughter and processing establishment, and four beef processing establishments. The products these establishments produce and export to the United States include raw and processed beef and pork products.

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 DIPOA's ability to provide oversight through supervisory reviews conducted in accordance with FSIS equivalence requirements for foreign food safety inspection systems outlined in 9 CFR 327.2.

The FSIS auditors also visited two government residue and microbiological testing laboratories to verify that these laboratories are capable of providing adequate technical support to the food safety inspection system.

Competent Authority Visits		#	Locations
Competent Authority	Central	1	• Department of Inspection for Products of Animal Origin (DIPOA), Brasília, Distrito Federal
	Regional Inspection Offices	2	• Inspection Service for Products of Animal Origin (SIPOA) Offices: – Campo Grande (Mato Grosso do Sul) – Belo Horizonte (Minas Gerais)
Laboratories		2	• Laboratórios Federais de Defesa Agropecuária (LFDA), government microbiological and residue testing: – LFDA São Paulo, Campinas – LFDA Minas Gerais, Pedro Leopoldo
Beef slaughter and processing establishments		7	• Establishment SIF 431, Minerva SA, Palmeiras de Goiás, Goiás • Establishment SIF 2471, Minerva SA, Janaúba, Minas Gerais • Establishment SIF 2500, Minerva SA, Paranatinga, Mato Grosso

		• Establishment SIF 4400, JBS SA, Campo Grande, Mato Grosso do Sul • Establishment SIF 2543, Marfrig Global Foods S.A., Promissão, São Paulo • Establishment SIF 4238, Marfrig Global Foods S.A., Bataguassu, Mato Grosso do Sul • Establishment SIF 4333, JBS SA, Vilhena, Rondônia
Pork slaughter and processing establishment	1	• Establishment SIF 3548, Cooperativa Central Aurora Alimentos, Chapecó, Santa Catarina
Beef processing establishments	4	• Establishment SIF 260, Meat Snack Partners do Brasil Ltda, Lins, São Paulo • Establishment SIF 337, JBS SA, Lins, São Paulo • Establishment SIF 385, JBS SA, Andradina, São Paulo • Establishment SIF 1690, Meat Snack Partners do Brasil Ltda, Santo Antônio de Posse, São Paulo

FSIS performed the audit to verify that Brazil's food safety inspection systems meet 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 Slaughter Act (7 U.S.C. Sections 1901-1907); and
- The Meat Inspection Regulations (9 CFR parts 301 to the end).

The audit standards applied during the review of Brazil's inspection systems for raw and processed beef and pork products 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 Agreement on the Application of Sanitary and Phytosanitary Measures.

III. BACKGROUND

From May 1, 2019, to April 30, 2022, FSIS import inspectors performed 100 percent reinspection for labeling and certification on 659,757,038 pounds of beef and pork products from Brazil. This included 154,282,186 pounds of TPCS beef; 225,119 pounds of RTE beef fully-cooked without subsequent exposure to the environment; 43,247,821 pounds of RTE fully-cooked beef; 97,533,903 pounds of RTE dried beef; 279,340,378 pounds of raw intact beef; 425,923 pounds of NRTE otherwise processed beef; 84,662,024 pounds of raw intact pork; and 39,684 pounds of NRTE otherwise processed pork exported by Brazil to the United States.

Additional types of inspection were performed on 142,944,352 pounds of beef and pork (44,494,191 pounds of TPCS beef; 181,889 pounds of RTE beef fully-cooked without

subsequent exposure to the environment; 21,671,782 pounds of RTE fully-cooked beef; 13,568,605 pounds of RTE dried beef; 50,699,473 pounds of raw intact beef; 22,551 pounds of NRTE otherwise processed beef; and 12,305,861 pounds of raw intact pork). These additional types of inspection included physical examination, condition of container examination for TPCS products, chemical residue analysis, and testing for microbiological pathogens (*Escherichia coli (E. coli)* O157:H7 and Shiga-toxin-producing *E. coli* (STEC) serogroups O26, O45, O103, O111, O121, and O145 in beef products; and *Listeria monocytogenes (Lm)* and *Salmonella* in RTE products). As a result of this additional testing, 173,873 pounds of beef products were rejected for issues related to public health (abnormal container, STEC and fecal contamination. The FSIS auditors verified the implementation of the corrective actions provided to FSIS in response to POE violations at the audited SIPOA offices and establishments and confirmed that one SIPOA had suspended certification at one certified establishment and the SIF teams were verifying the execution of corrective actions.

An additional 287,189 pounds of beef products and 13,415 pounds of pork products were refused entry for non-food safety reasons such as shipping damage, labeling, or other miscellaneous issues.

The previous FSIS targeted onsite equivalence verification audit of Brazil's meat inspection system in 2020 verified the implementation of DIPOA's corrective actions in response to FSIS' June 10-28, 2019 audit findings and did not identify any additional systemic findings.

The most recent FSIS final audit reports for Brazil's food safety inspection system are available on the FSIS website at: www.fsis.usda.gov/foreign-audit-reports

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

The first equivalence component 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.

Brazil's CCA is DIPOA, a department under the Ministry of Agriculture, Livestock, and Food Supply (MAPA). Law No. 1,283/1950 and Ordinance No. 562/2018 (Internal Regulation of the Secretariat of Animal Plant Health) require the official sanitary inspection of all edible and inedible products of animal origin. Decree No. 9,013/2017 (Regulation of Industrial and Sanitary Inspection of Animal Products [RIISPOA]) implements these policies and provides DIPOA with the authority to regulate the registration, the conditions of operation, hygiene, and maintenance of establishments. Article 141 of Ordinance No. 562/2018 identifies the regional Inspection Service of Products of Animal Origin (SIPOA) as responsible for scheduling, executing, monitoring, coordinating, and evaluating inspection and oversight activities of animal products including activities conducted by the Federal Inspection Service (SIF) personnel who perform daily inspections at the establishments. The FSIS auditors confirmed the only change in the

organizational structure of DIPOA since the last FSIS audit was the creation of the 11th SIPOA through Decree No. 10,253/2020.

RIISPOA outlines the authority and responsibility of MAPA, DIPOA, SIPOA, and SIF to enforce the laws and regulations governing meat products. The FSIS auditors verified through record review and interviews that, within DIPOA, three entities are responsible for the uniform and consistent implementation of inspection duties at establishments certified for export to the United States: the General Coordination for Special Programs (CGPE), the General Coordination for Inspection (CGI), and the General Coordination of Control and Evaluation (CGCOA).

Eleven decentralized SIPOA units, located in regions established by DIPOA, perform oversight and follow-up of the inspection performed by the SIF teams. Inspection at the local level is conducted by the SIF team assigned to each establishment registered with DIPOA. The SIF team is headed by an official veterinarian who is supported by online inspection staff consisting of inspection agents and inspection auxiliaries. The SIF has the responsibility and authority to implement and enforce inspection laws at the establishment level. DIPOA maintains oversight of the SIPOA units through the Division for National Audits (DIAN). Additionally, DIPOA oversees the SIF teams through the Department of Audits in Establishments (DAE) and Service for Audits in Establishments (SAE).

DIPOA regulates Brazil's inspection system for meat products by issuing decrees, ordinances, and normative instructions that establishments must follow. Memorandums and circulars contain instructions specific for inspection personnel. RIISPOA is the overarching legislation for MAPA and includes sanitary and operational requirements applicable to all Brazilian establishments involved in agricultural processes. DIPOA/SDA Norma Interna No. 1/2017 includes government verification instructions for the SIF teams to ensure all establishments, including those certified to export meat products to the United States, comply with Brazilian laws, DIPOA policies, and the requirements of foreign markets. Circular Letter No. 35/2022, Consolidated Document of Supplementary Export Requirements (hereafter referred to as the Consolidated Document), describes DIPOA's requirements for products intended for export to the United States and establishes specific government verification activities at establishments certified for export to the United States.

RIISPOA outlines DIPOA's authority and responsibility to require corrective measures in establishments and to take enforcement actions as appropriate when an establishment does not meet regulatory requirements set by DIPOA or the importing countries. The enforcement strategies include warning, product seizure, closure of the establishment, suspension, or partial withdrawal of inspection, revocation of establishment registration, and removal from the list of establishments certified for export to foreign markets. At the establishment level, regulatory control actions that may be taken by inspection personnel include detaining products, rejecting equipment or facilities, or stopping or slowing the line speed.

The FSIS auditors verified through interviews and record reviews that DIPOA has provided instructions to its inspection personnel to document noncompliant findings on a Noncompliance Record (NR). The FSIS auditors reviewed NRs for the audited establishments and verified that inspection personnel had identified and documented noncompliant findings in accordance with

DIPOA's requirements. Inspection personnel closed the NRs after verifying the adequacy and effectiveness of the establishment's preventive and corrective actions. The FSIS auditors also reviewed records associated with the suspension of export certification by DIPOA at an establishment eligible for export to the United States and confirmed that DIPOA has the authority to take enforcement action when an establishment does not meet regulatory requirements.

DIPOA has the legal authority and responsibility to ensure that no meat products intended for export to the United States are adulterated or misbranded (e.g., properly labeled and packaged), and only eligible meat products are certified for export to the United States. The FSIS auditors verified that products destined for export to the United States were produced in accordance with requirements set by FSIS and APHIS. Lots of slaughtered animals that complied with these requirements were identified by tags and were traceable within the establishment from production to shipping of products. Raw meat products used as source materials for products intended for export to the United States only came from Brazilian establishments eligible for export to the United States. When shipped within Brazil, those meat products were accompanied by National Sanitary Certificates (CSNs) issued by the SIF team assigned to the originating establishment for the source materials. The CSN guarantees safety and traceability, including, where applicable, that the products comply with the export requirements of the United States.

Before certifying product for export to the United States, the establishment must request electronically the issuance of an International Sanitary Certificate (CSI) using the Management Information System of the Federal Inspection Service (SIG-SIF) to enter detailed information (e.g., animal origin, sanitation, laboratory test results, results from the implementation of self-monitoring programs, pre-shipping report, and support for proper separation and storage of products) for products intended for export. The SIF team then conducts a document review to verify that FSIS import requirements are met before issuing the CSI. The FSIS auditors identified the following finding regarding the certification of products intended for export to the United States:

- DIPOA does not ensure that government inspection personnel verify RTE products subjected to official microbiological testing for *Lm* and *Salmonella* are acceptable prior to signing the export certificate. However, the FSIS auditors did not identify that any adulterated product was exported to the United States.

The FSIS auditors verified that all audited establishments have developed a precautionary recall plan, as required by Circular Letter 41/2010 and the Consolidated Document. In addition, those establishments conduct mock recalls annually to verify effectiveness of their plans.

DIPOA has the authority to certify and decertify establishments for eligibility to export to the United States. In accordance with Articles 25 through 38 of the Consolidated Document, establishments seeking export certification must be registered with DIPOA, and submit to the Eligibility and Certification Division (DHC) documentation supporting that all the sanitary requirements of the importing country are met. After review and approval of the documentation, a DHC's Federal Agricultural Inspector/Auditor (AFFA) visits the establishment to inspect the facilities and issues a favorable recommendation if the importing country's requirements are met.

If DIPOA determines that U.S. import requirements are met, the establishment is registered and added to the list of establishments eligible for export to the United States. The newly registered establishment can start export activities only after DIPOA has assigned a SIF team that is fully trained on U.S. import requirements to the establishment. In accordance with Section 2.3 of the Consolidated Document, after an audit or during daily inspection duties, DIPOA may suspend an establishment's certification for export to the United States if the establishment fails to comply with FSIS requirements.

At the establishments, official veterinarians (AFFA) are assisted by inspection agents and inspection auxiliaries. In establishments certified to export to the United States, the inspection personnel are employed by the Brazilian government at the federal, state, and municipal levels. Staffing information is maintained in SIG-SIF and DIPOA verifies employment during the DIAN and DAE audits. The FSIS auditors verified that DIPOA disseminates information regarding U.S. requirements from headquarters to government inspection personnel using the bulletin board in the SIG-SIF system.

The FSIS auditors conducted interviews and document reviews at DIPOA headquarters and SIPOA offices to assess requirements for minimum education, hiring, and training of government inspection staff employed at certified establishments. The minimum educational requirement for a veterinarian to be assigned to an establishment is a doctorate in veterinary medicine or an equivalent degree. For other online and support inspection staff (i.e., inspection agents and auxiliaries), the employees must possess a high school diploma to be eligible to apply for a government inspector's position. All new employees including those in positions as veterinarians, inspection agents, or auxiliaries, receive initial in-class and on-the-job training. DIPOA routinely organizes classroom and virtual training for inspection staff regarding U.S. import requirements.

The FSIS auditors verified that every certified establishment that exports to the United States is included in the National Program for Control of Pathogens (PNCP) and the National Program for Control of Residues and Contaminants (PNCRC). DIPOA is responsible for direct oversight of government laboratories that conduct official chemical residue and microbiological testing of meat products exported to the United States. The General Coordination for Laboratory Support (CGAL) is the agency within DIPOA responsible for certifying official and accredited third-party laboratories and for validating the analytical methods to be employed by the laboratories that analyze official samples, in accordance with Normative Instruction No. 57/2013. Only laboratories in compliance with CGAL standards are authorized to carry out official analyses. Both government-owned and third-party laboratories carry out analysis of official samples and are considered part of Laboratórios Federais de Defesa Agropecuária (LFDA). Third-party laboratories must be approved by DIPOA and CGAL and are subject to audit by the CGAL twice per year.

The FSIS auditors visited two LFDA government laboratories: LFDA São Paulo in Campinas (LFDA SP) and LFDA Minas Gerais (LFDA MG) in Pedro Leopoldo. Both laboratories are accredited by the General Coordination for Accreditation of National Institute of Metrology, Standardization and Industrial Quality (INMETRO) according to International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025 standards.

INMETRO audits both laboratories as part of maintenance of accreditation. In addition to INMETRO accreditation audits of the laboratories, DIPOA/CGAL also conducts internal audits of LFDA laboratories once a year.

During the audits of these facilities, the FSIS auditors verified the sample receipt procedures, acceptance criteria (including temperature requirements), handling, storage, traceability, and laboratory reporting procedures. Both facilities utilize a local Laboratory Information Management System (LIMS) to ensure traceability and proper reporting of results to DIPOA. The FSIS auditors verified equipment was routinely calibrated and maintained, and that reagents were properly labeled and maintained (e.g., expiration dates for prepared media).

The FSIS auditors reviewed laboratory personnel training records and confirmed that laboratory personnel receive initial and ongoing training regarding U.S. import requirements to maintain competency in analytical methods used for products intended for export to the United States. The FSIS auditors also verified that both official laboratories participate in proficiency testing to ensure the validity of results and confirm that the laboratories are able to analyze the samples. However, the FSIS auditors identified the following finding during the audit of the LFDA MG laboratory:

- DIPOA did not ensure that the audited microbiology laboratory (Laboratórios Federais de Defesa Agropecuária Minas Gerais (LFDA) MG) adequately addressed nonconformities in accordance with ISO/IEC 17025 standards. In 2020, LFDA MG did not develop and implement corrective actions to address a failed proficiency test for STEC, primarily because it could not receive spiked samples from foreign suppliers with genetic material for all STEC serogroups so they could perform the test method as written.

The FSIS auditors verified that official samples are shipped from the establishments and arrive at the laboratories in a timely manner. The laboratories e-mail the sample results directly to the SIF team that collected the sample. The FSIS auditors confirmed that samples with violative or unacceptable test results are not resampled or retested.

Except for the finding noted above related to the official hold and test procedures for RTE products and the lack of corrective actions to address laboratory nonconformities in 2020, the FSIS auditors concluded that DIPOA continues to organize, administer, and enforce its food safety inspection systems for beef and pork products in a manner that meets the core requirements of this component.

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 equivalence component the FSIS auditors reviewed was Government Statutory Authority and Food Safety and Other Consumer Protection Regulations. The foreign inspection system is to provide for humane handling and slaughter of livestock; ante-mortem inspection of animals; post-mortem inspection of every carcass and its 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.

RIISPOA requires Brazilian establishments to develop self-control procedures for animal welfare in accordance with specific requirements concerning establishment facilities, livestock handling (including during transport and unloading), access to feed and water, stunning, and sticking during slaughter. Through record review and observation, the FSIS auditors confirmed that inspection personnel verify the establishments' compliance with humane handling requirements at least once every two weeks, in accordance with DIPOA/SDA Norma Interna No. 1/2017.

RIISPOA contains general requirements concerning ante-mortem and post-mortem inspections at slaughter establishments. Sections 6.1.1 and 7 of the Consolidated Document contain specific procedures for ante-mortem and post-mortem inspections of bovine and swine animals destined for export to the United States. The FSIS auditors verified that an in-plant official veterinarian conducts ante-mortem inspection on the day of slaughter, including review of incoming registration and identification documents.

Brazilian ante-mortem inspection procedures require the SIF veterinarian to observe the animals just prior to slaughter, at rest and in motion. The FSIS auditors observed that all animals have access to water in holding pens, and feed is available if animals are held longer than 24 hours. The FSIS auditors confirmed that each audited slaughter establishment provides a separate holding pen designated for observation and further examination of suspect animals. The FSIS auditors verified through observation and discussion that animals showing signs of central nervous system disease are segregated. Cattle destined for emergency slaughter have their brain stems sampled for BSE diagnosis, in accordance with Section 6.1.1.3 of the Consolidated Document. In addition, the FSIS auditors also verified that animals showing signs of contagious and infectious disease or have a body temperature greater than 40.5°C for bovine and 41°C for swine are also condemned. The FSIS auditors also verified that animals that are dead on arrival are necropsied onsite. Additionally, although non-ambulatory disabled cattle are not eligible for export to the United States and their carcasses are segregated at the chiller and throughout the deboning process, the FSIS auditors identified the following finding:

- For humane slaughter reasons, DIPOA allows for the slaughter of non-ambulatory disabled cattle on the same slaughter line and at the same time as cattle eligible for the United States market. However, non-ambulatory disabled cattle are not eligible for export to the United States and their carcasses are identified and segregated at the chiller and throughout the deboning process.

The FSIS auditors confirmed that in-plant inspection personnel are required to conduct post-mortem inspection in accordance with the Consolidated Document and RIISPOA. The FSIS auditors observed that inspection personnel conduct post-mortem inspection of every carcass and parts immediately after slaughter. This includes proper presentation, identification, examination, and disposition of each carcass and accompanying viscera. The FSIS auditors verified that DIPOA provides adequate staffing at all the audited beef and pork slaughter and processing

establishments to ensure continuous inspection coverage during slaughter operations, and at least once-per-shift inspection during processing operations.

As noted earlier, the inspection team at the audited establishments consists of a chief veterinarian, assisted by inspection agents and inspection auxiliaries who conduct post-mortem inspection activities at the head, viscera, and carcass inspection stations. The FSIS auditors observed the number of inspection personnel who conduct post-mortem inspection examination in each audited establishment and concluded that DIPOA assigned enough inspection personnel for the existing production volume and slaughter line speed, consistent with DIPOA's requirements.

Through Normative Instruction No. 102/2020, DIPOA ensures that a representative of the government inspection system makes periodic supervisory visits to each certified establishment with the purpose of evaluating the performance of inspection personnel and the establishments certified for export to the United States. DAE is responsible for conducting audits of certified establishments while DIAN is responsible for conducting audits of SIPOA. The FSIS auditors reviewed supervisory review reports at the audited establishments and confirmed that Veterinarian Federal Agricultural Inspectors/Auditors (AFFA-MV) from DAE are making supervisory visits at least once a year and the frequency may be increased for establishments exhibiting issues associated with public health or overall underpinnings of certification. The FSIS auditors confirmed that the SIF audits are entered in the Electronic Information System (SEI) and are accessible to the authorized personnel of DIPOA. These audits focus on SIF oversight of the establishment and the conditions within and around the certified establishments. The FSIS auditors verified that audit findings were addressed through action plans by both the SIF team and the establishments and entered in the SEI system. The FSIS auditors also reviewed the performance appraisals of the inspection agents and inspection auxiliaries by AFFA at the audited establishments and confirmed that they were conducted at the required annual frequency and unsatisfactory performance was addressed locally by AFFA.

Section 6.1.1.7 of the Consolidated Document defines specified risk material (SRM) as: (a) for bovines that are 30 months or older, the brain, skull, eyes, trigeminal nerve, spinal cord, spinal roots and ganglia, spinal cord (except the tail vertebrae, the transverse processes of lumbar and thoracic vertebrae, and the ala of sacrum); and (b) for bovines of all ages, the tonsils (palatine and lingual) and the portion of the distal ileum measuring 203.2 cm (80 inches). The FSIS auditors verified through document review that the audited beef slaughter establishments included procedures related to the removal, segregation, and disposal of SRM, as required by the Consolidated Document.

The FSIS auditors also observed the proper removal of SRMs and their storage in designated containers identified with the Portuguese acronyms for SRM or BSE to prevent cross-contamination with other products in the audited establishments. The audited establishments did not use any device that injects air into the cranium of cattle. Establishments that used a captive bolt device to stun the animals sealed the stunning hole in the frontal bone with a plug to prevent leakage of brain material to surrounding tissues. Establishment employees responsible for SRM removal are required to wash and sanitize their hands and equipment after each carcass. DIPOA requires that all SRM be disposed of through rendering, incineration, or burial in an approved

landfill. The FSIS auditors' review of records (in-plant inspection verification records concerning removal, segregation, and disposal of SRM) and observation of removal and segregation of SRM, did not identify any concerns.

Section III of RIISPOA requires establishments to maintain the identity of products and to control and segregate ineligible products from eligible products for export to the United States. The FSIS auditors verified through document review and discussion that the audited beef and pork slaughter and processing establishments processed raw meat products only from livestock that were slaughtered on-premises or from other Brazilian establishments certified for export to the United States. The FSIS auditors also verified that all audited establishments have established procedures for complete separation of eligible products intended for export to the United States from ineligible products after chilling by space or time in the coolers and freezers. The FSIS auditors' review of in-plant inspection verification and periodic supervisory review records and observation of designated areas in the coolers and freezers did not identify any concerns. The FSIS auditors verified that condemned animals were euthanized and necropsied and did not enter the slaughter line. In addition, the FSIS auditors also confirmed through observation, discussion, and review of official inspection records that inedible materials were denatured and destroyed by the audited establishments, in accordance with DIPOA's requirements.

Section 4 of the Consolidated Documents requires that meat products intended for export to the United States meet U.S. labeling requirements. The FSIS auditors verified that prior to exporting meat to the United States, establishments must secure label approval from DIPOA, as required by Chapter III, Section I of RIISPOA. Additionally, the FSIS auditors confirmed that all certified establishments must submit for review by AFFA the labels of the products they intend to export to the United States when seeking export certification by DIPOA. The FSIS auditors reviewed a sample of the label sketches and approvals used by the audited establishments and did not identify any concerns.

The FSIS auditors verified that SIF inspectors and establishment personnel ensure the establishments' compliance with APHIS requirements and disease restrictions. The FSIS auditors confirmed that SIF inspection personnel examined the coronary band for each hoof as well as the lips and snout of each individual animal slaughtered. In addition, the FSIS auditors observed that establishment employees measured the pH for each half carcass after it had gone through the maturation chamber for at least 24 hours as well as the carcass temperature requirements, in accordance with Section 6.3.1 of the Consolidated Document and APHIS requirements. The FSIS auditors confirmed that inspection personnel were verifying the establishments' compliance with APHIS requirements every two weeks, as required by DIPOA/SDA Norma Interna No. 1/2017.

Except for the finding noted above regarding separation of non-ambulatory disabled cattle and cattle intended for export to the United States during slaughter and dressing, the FSIS auditors concluded that DIPOA has the legal authority, a regulatory framework, and adequate verification procedures to ensure sufficient regulatory control using statutory authority consistent with criteria established for this component.

VI. COMPONENT THREE: GOVERNMENT SANITATION

The third equivalence component the FSIS auditors reviewed was Government Sanitation. The FSIS auditors verified that the CCA requires each official establishment to develop, implement, and maintain written sanitation standard operating procedures (Sanitation SOP) to prevent direct product contamination or insanitary conditions, and to maintain requirements for sanitation performance standards (SPS) and sanitary dressing.

RIISPOA requires that all registered establishments' facilities, equipment and utensils be designed, built, operated and maintained in a sanitary manner before, during, and after operations. The FSIS auditors toured all audited establishments and confirmed that they were properly maintained and clean. Through record review, the FSIS auditors verified that in-plant inspection personnel were verifying DIPOA's SPS requirements once every two weeks, in accordance with DIPOA/SDA Norma Interna No. 1/2017.

The FSIS auditors verified that DIPOA ensures that livestock are slaughtered and processed in a sanitary manner, to prevent carcass contamination with feces, ingesta, milk, bile, hair, dirt, or foreign material. Article 74 of RIISPOA requires establishments to develop, implement, monitor, and maintain Sanitation SOP that prevent direct and cross-contamination of products prior to, during, and after operations. Additionally, RIISPOA requires establishments to incorporate slaughter controls in self-monitoring programs and address conditions that would result in conditional use or condemnation of carcasses at slaughter.

DIPOA further supplements RIISPOA with prescriptive requirements regarding official verification at all slaughter establishments certified for export to the United States in Section 9 of the Consolidated Document. The FSIS auditors verified that the certified establishments maintained written procedures for sanitary dressing of carcasses, outlining specific measures taken throughout slaughter to prevent carcass contamination. The FSIS auditors verified that both the establishments and SIF personnel monitor and verify, respectively, that these procedures are conducted at least once each shift. DIPOA further requires inspection personnel to verify, through direct observation and records review, that establishments carry out sanitary dressing throughout slaughter process. During the visits of each of the slaughter facilities, the FSIS auditors directly observed the establishments employing sanitary dressing procedures, in accordance with DIPOA's requirements.

The FSIS auditors observed in-plant inspection personnel conduct pre-operational sanitation verification inspection at two of the audited establishments. The verification by in-plant inspection personnel was performed after the establishment had conducted its pre-operational sanitation procedures and determined that the facility was ready for production. Pre-operational sanitation verification is conducted by in-plant inspection personnel once every two weeks in accordance with DIPOA/SDA Norma Interna No. 1/2017.

The FSIS auditors observed in-plant inspection personnel perform operational sanitation verification at all audited establishments. The FSIS auditors confirmed that the inspection verification activities included direct observation of operations and review of establishment records. The FSIS auditors reviewed the establishments' sanitation monitoring and corrective

action records, in addition to inspection records documenting in-plant inspection verification results, non-compliances, and supervisory reviews. The FSIS auditors verified inspection records which showed that in-plant inspection personnel have identified and documented sanitation findings in their daily verification records.

Except for the isolated observations documented in establishment checklists provided in Appendix A of this report, the FSIS auditors concluded that Brazil's meat inspection system continues to develop, implement, and maintain sanitation programs, including requirements for SPS, Sanitation SOP, and sanitary dressing to meet the core requirement of this component.

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

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

Ordinance No. 46/1998 requires that manufacturers of edible animal products utilize HACCP in establishments under SIF inspection. This ordinance requires that each establishment develop, implement, and maintain a HACCP system that integrates the seven principles of HACCP to identify, prevent, and control hazards. Only establishments that have implemented a HACCP system are eligible for interstate or international commerce.

The FSIS auditors verified through record review and observation that the in-plant inspection personnel at establishments certified to export to the United States conducted daily verification of implementation of HACCP plans. In-plant inspection personnel verify critical control points (CCPs) for all production shifts in accordance with DIPOA/SDA Norma Interna No. 1/2017 and the Consolidated Document.

Section 6.1.1.6 of the Consolidated Document provides in-plant inspection personnel with instructions for verifying zero-tolerance standards. The FSIS auditors observed in-plant inspection personnel conduct zero-tolerance verification tasks on carcasses and confirmed that inspection personnel were thoroughly examining the entire carcass to ensure the absence of fecal material, milk, or ingesta.

At the audited slaughter establishments, the FSIS auditors conducted a review of the zero tolerance CCP records for feces, ingesta, and milk that are maintained by the establishments in accordance with DIPOA's requirements. In addition, the FSIS auditors reviewed the in-plant inspection personnel associated zero tolerance verification records at these locations. All establishments audited were conducting 100 percent monitoring of carcasses for this CCP. The FSIS auditors verified that the establishments properly addressed with corrective actions the observed deviations from zero-tolerance critical limit. Furthermore, the FSIS auditors confirmed that the physical CCP monitoring location for government verification was before the final wash in all audited establishments, in accordance with DIPOA requirements.

The FSIS auditors verified that establishments certified for export to the United States addressed prevention of contamination of carcasses with STEC, including *E. coli* O157:H7 and STEC serogroups (O26, O45, O103, O111, O121, and O145) in their HACCP systems. In addition to 100 percent monitoring of the zero-tolerance CCP, the establishments typically implement additional control points (e.g., chlorinated live animal washes; post-stun washing of the perianal region; use of steam vacuums; and sanitizing of utensils between each carcass during bleeding, dehorning, skinning, and removal of udders).

All establishments producing 50,000 pounds or more of beef trimmings daily had developed a program to address high event periods (HEP), which are defined as periods in which slaughter establishments experience a high rate of positive results for STEC (or virulence markers) in trim samples from production lots containing the same source materials. The HEP are determined using statistically based criteria that are described in Section 6.3.3.3 of the Consolidated Document.

At establishments producing frozen cooked beef, dried beef, beef jerky, and RTE pork products the FSIS auditors reviewed the HACCP programs for these processes with a special emphasis on lethality for *Lm*, *Salmonella* and other relevant pathogens. For frozen cooked beef, the FSIS auditors observed that all establishments had a lethality CCP in place in order to comply with the Consolidated Document's requirements that establishments certified to export cooked beef to the United States address the hazards of *Salmonella*, *Lm*, and the FMD virus control in the HACCP plans. In addition, the FSIS auditors observed establishment employees conduct a pink juice test at one of the audited establishments that exports frozen cooked beef to the United States and confirmed that the test was conducted in accordance with DIPOA's requirements.

In the audited facilities that were producing dried beef and beef jerky, the establishments included appropriate measures to address lethality (e.g., relative humidity within the cooking cycle, cooking temperature, and water activity). The FSIS auditors also reviewed the validation documents at these establishments and verified that the lethality achieved by these processes exceeded the minimum 6.5-$\log_{10}$ reduction for *Salmonella* prescribed in the Consolidated Document.

At the audited pork slaughter establishment, the FSIS auditors verified through record review and interviews that the establishment was testing 100 percent of the carcasses for *Trichinella spiralis*, in accordance with the requirements of Section 7.2.2 of the Consolidated Document. The FSIS auditors confirmed that the chief veterinarian was reviewing the results of the *Trichinella spiralis* samples for acceptability before signing the export certificates of products destined to the United States.

The FSIS auditors determined that DIPOA requires certified establishments to develop, implement, and maintain a HACCP system that is consistent with criteria established for this component. The FSIS auditors identified isolated non-compliances related to the inspection verification of HACCP recordkeeping requirements, which are noted in the individual establishment checklists provided in Appendix A of this report.

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

The fifth equivalence component the FSIS auditors reviewed was Government Chemical Residue Testing Programs. The foreign 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, or muscle of carcasses for chemical residues identified by the exporting country's meat products inspection authorities or by FSIS as potential contaminants.

Brazil's National Plan for Control of Residues in Products of Animal Origin (PNCRC) was established by Ministerial Decree Nos. 51/1986 and 527/1995. The PNCRC functions to control and conduct surveillance of products for chemical residues, using the Codex Alimentarius as the basis for developing the parameters of the program. The PNCRC includes three sampling subprograms: (1) monitoring, (2) investigation, and (3) imported products.

The implementation and maintenance of the PNCRC is carried out by DIPOA's Coordination of Risk Characterization and the sampling is performed by government inspection personnel assigned to the establishments. FSIS auditors verified through discussion and document review that all registered establishments eligible to export raw meat to the United States are included in the PNCRC. The FSIS auditors also verified that DIPOA develops a statistically based annual residue sampling program that is administered throughout the year. In addition, DIPOA headquarters issues weekly sampling orders randomly selecting the establishments that must collect the residue samples. High-volume producing establishments are more likely to be selected for sampling.

The PNCRC lists the chemical residue compounds included in testing, number of samples, targeted matrices (tissues), and amounts of matrix to be collected for each analysis. All substances to be analyzed under the PNCRC must comply with the established tolerances or action levels for the substance in the tissue being analyzed, as defined in the Consolidated Document.

The FSIS auditors reviewed PNCRC sampling records and confirmed the sampling schedule had been adhered to at all audited beef and pork slaughter establishments. DIPOA uses the System to Control Residues and Contaminants (SISRES computer system) when issuing sampling orders for the SIF teams and to record the results of the samples. The FSIS auditors confirmed that livestock carcasses subjected to sampling as part of the PNCRC were held by the slaughter establishment pending receipt of acceptable results. The FSIS auditors also confirmed that before signing export certificates to the United States, official veterinarians verified that the results met U.S. tolerances or action levels as required by Section 6.1.3 of the Consolidated Document.

In the event of a violative residue sample, Ordinance SDA No. 396/2009 requires a blockade of the farm of origin in the SISRES system or the application of an alert stamp on the animal movement permit by the State Official Veterinary Services. After that, MAPA's Input Control Service, Veterinary Drug Control Service, and Feed Control Service investigate the violator farm while the SIF team requires that the establishment present an action plan which includes corrective and preventive measures. The next lots of animals from the violator farm are sampled

for chemical residues until five consecutive sample results are compliant. All products containing violative levels of chemical residues are condemned in accordance with the requirements in the Consolidated Document.

The FSIS auditors determined that Brazil continues to maintain overall authority for a chemical residue testing program which is designed and implemented to prevent and control the presence of veterinary drugs and chemical contaminants in meat products destined for export to the United States.

IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS

The sixth equivalence component the FSIS auditors reviewed was Government Microbiological Testing Programs. The foreign food safety inspection system is to implement certain sampling and testing programs to ensure that meat products prepared for export to the United States are safe and wholesome. This component also addresses requirements for TPCS meat products.

Sections 6.1.2.2 and 7.2.4 of the Consolidated Document require that all certified establishments that slaughter bovine and swine intended for export to the United States include in their self-control programs carcass testing for generic *E. coli* at the frequency of one (1) sample per 300 carcasses for bovine and two (2) samples per 1,000 carcasses for swine. Bovine carcass samples are to be collected from the brisket, flank, and rump while swine carcass samples must be collected from the leg, belly, and jowl. The FSIS auditors observed establishment employees collect generic *E. coli* samples from chilled bovine carcasses and both at pre-evisceration and in the coolers from swine carcasses and confirmed that the samples were collected in accordance with DIPOA's requirements. The FSIS auditors verified through record review that the slaughter establishments were using a statistical process control criteria to evaluate and respond to the results of the generic *E. coli* sampling. The FSIS auditors also verified through document review that inspection personnel are reviewing the establishments' sample results and submitting those results to their respective SIPOA on a monthly basis, as required by the Consolidated Document.

DIPOA implements an official *Salmonella* verification sampling program for raw beef products that is consistent with the FSIS *Salmonella* performance standards in 9 CFR 310.25(b). Additionally, although no longer required by FSIS equivalence, DIPOA implements official verification sampling for *Salmonella* in swine carcasses. DIPOA requires that one *Salmonella* set be scheduled once per year. For cattle, a set consists of 82 carcass samples with one positive sample considered acceptable. For swine, a set consists of 55 carcass samples and up to 6 positive samples is considered acceptable. An establishment exceeding the number of acceptable *Salmonella* positives in its first set must take immediate corrective action and reassess its HACCP plan, after which a second set of samples is collected. If the establishment fails to meet the performance standard on the second sample set, then the HACCP plan is audited by DIPOA, and another sample set is collected. If an establishment fails three consecutive sample sets, it is removed from the list of establishments eligible to export to the United States. The suspension would remain in effect until the establishment achieves the performance standard set.

The FSIS auditors verified that DIPOA schedules each *Salmonella* sample series. The SIPOA offices are responsible for informing local inspection personnel at SIF establishments when sampling is to begin and end, and for monitoring of the results. Brazil has an approved individual sanitary measure in place for official *Salmonella* verification sampling, which permits establishment employees to collect the samples and for samples to be analyzed in third-party laboratories. SIF inspection personnel randomly select carcasses on the morning the sample is to be collected, with no prior notification to the establishment. SIF inspection personnel observe the collection of each sample taken by establishment personnel, as well as measures related to sample integrity and security. Approved laboratories use FSIS Microbiological Laboratory Guidebook (MLG) Chapter 4.10 for *Salmonella* analyses. In order to ensure that the food safety measures and objectives associated with this equivalence determination continues to be met, the FSIS auditors observed establishment employees collecting *Salmonella* samples at three beef slaughter establishments and official inspection personnel collecting *Salmonella* samples at two other beef slaughter facilities and one swine slaughter establishment. No concerns arose from these observations.

DIPOA considers STEC an adulterant in beef trimmings and whole pieces of beef intended for grinding. Section 6.3.3 of the Consolidated Document requires that registered establishments exporting raw beef to the United States include in their self-control programs procedures to test for STEC in all lots of beef manufacturing trimmings and whole pieces intended for grinding that are exported to the United States. The establishments must also ensure microbiological independence of the production lots and hold all lots subjected to official or establishment STEC sampling until confirmation of acceptable results.

The FSIS auditors also verified that DIPOA's PNCP, which is described in Normative Instruction No. 60/2020, the Consolidated Document, and RIISPOA includes instructions for sample collection and testing of beef products for STEC. The FSIS auditors verified that inspection personnel stationed at the registered beef slaughter establishments that export to the United States collect STEC samples at least once every month using the N60 sampling method, in accordance with DIPOA's requirements. The FSIS auditors confirmed that the laboratories analyzing official beef samples implement FSIS's MLG 5C.02 method for screening and confirmation of STEC.

DIPOA has developed an official verification testing program for *Lm* and *Salmonella* in RTE products that are eligible to be exported to the United States. The FSIS auditors verified that the laboratories use FSIS MLG methods for the detection of *Salmonella* (MLG Chapter 4) and *Lm* (MLG Chapter 8) in test portions consistent with FSIS testing (i.e., 325 grams for *Salmonella* and 25 grams for *Lm*. The Consolidated Document contains RTE sampling and inspection verification instructions for government personnel in establishments certified to export to the United States. During official verification inspection activities, the government inspectors assess the certified establishment's control of *Listeria* via sanitation, prerequisite programs, process control records, and the *Listeria* Sentinel Program. The establishments certified to export to the United States identify surfaces in direct and indirect contact with the product and design the routine self-monitoring sampling programs for *Listeria* species in the processing environment.

The Consolidated Document requires the SIF team to collect one food contact surface (FCS)

sample per month for each category of RTE product (frozen cooked beef and dried beef) to be analyzed for *Lm*. DIPOA also mandates establishments to take five samples (three FCS and two non-FCS) per production line per week to be analyzed for *Lm*. All samples are collected under observation by inspection personnel and sent in a secured package to a third-party laboratory for analysis. Moreover, as part of the official verification program, government inspectors collect monthly product samples of cooked frozen meat and bimonthly samples of dried beef products to be analyzed for *Salmonella* and *Lm*, water activity and moisture/protein ratio. The FSIS auditors reviewed both the establishments and official verification' sample results related to RTE products and processing environments and identified no concerns.

The FSIS auditors visited four establishments preparing TPCS products. Brazil's legislation defines commercial sterilization as the sterilization achieved by means of moist heat with an F_0 value greater than or equal to three minutes or to a 12-$\log_{10}$ reduction in *Clostridium botulinum*, followed by immediate chilling, as defined in item c) of Article 172 of RIISPOA. In addition to thermal process times and temperatures, Section 6.2.1.2 of the Consolidated Document requires establishments to monitor other critical factors such as initial temperatures, venting, vacuum and head space, seams, and control instruments (e.g., temperature recorders, indicator thermometers). Additionally, certified establishments must provide the SIF teams with detailed descriptions (e.g., process schedules) for each type of product for government review and approval prior to operations and these process schedules must be prepared by specifically trained technicians. The Consolidated Document identifies specific critical factors that must be identified by the production description.

Through observation, record review, and interviews, the FSIS auditors verified the content of the process schedules for products exported to the United States; procedures to address operations (e.g., posting of processes, retort traffic control, initial temperature) in thermal processing areas; incubation records; retort heat-distribution tests; and procedures to ensure proper closure of containers, including training of closure technicians. The FSIS auditors also reviewed the validation documents for the thermal process and noted that sterilization values afforded by these processes were typically around $F_0 = 10$, which is more than three times the minimum sterilization value of $F_0 = 3$ required by DIPOA.

The FSIS auditors concluded that Brazil's meat inspection system has a microbiological testing program organized and administered by the national government, and that DIPOA has implemented the necessary sampling and testing programs to verify the effectiveness of its systems.

X. CONCLUSIONS AND NEXT STEPS

An exit meeting was held on September 30, 2022, by videoconference with DIPOA officials. 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 Department of Inspection for Products of Animal Origin (DIPOA), Brazil's Central Competent Authority does not ensure that government inspection personnel verify that ready-to-eat (RTE) products subjected to official microbiological testing for *Listeria monocytogenes* and *Salmonella* are acceptable prior to signing the export certificate. However, the FSIS auditors did not identify that any adulterated product was exported to the United States.
- DIPOA did not ensure that the audited microbiology laboratory adequately addressed nonconformities in accordance with International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025 standards. In 2020, the laboratory did not develop and implement corrective actions to address a failed proficiency test for Shiga toxin-producing *Escherichia coli* (STEC), primarily because it could not receive spiked samples from foreign suppliers with genetic material for all STEC serogroups so they could perform the test method as written.

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

- For humane slaughter reasons, DIPOA allows for the slaughter of non-ambulatory disabled cattle on the same slaughter line and at the same time as cattle eligible for the United States market. However, non-ambulatory disabled cattle are not eligible for export to the United States and their carcasses are identified and segregated at the chiller and throughout the deboning process.

During the audit exit meeting, DIPOA officials committed to address the preliminary findings as presented. FSIS will evaluate the adequacy of the DIPOA'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	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Meat Snack Partners do Brasil Ltda Rodovia SP 340, km 142.5 Santo Antonio de Posse São Paulo	09/14/2022	SIF1690	Brazil
	5. NAME OF AUDITOR(S) OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

Establishment Operations:	Beef processing.
Prepared Products:	

60. Observation of the Establishment

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

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/14/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Minerva SA Av. Gentil Dias 2300 Bairro Barbosa Janúba MG	9/15/2022	SIF 2471	Brazil
	5. NAME OF AUDITOR(S) OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	X
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57.	
58.	
59.	

Establishment Operations:	Beef slaughter and processing
Prepared Products:	Raw intact beef

60. Observation of the Establishment

15. The hazard analysis did not identify the physical hazard of introducing a plug into the knock hole of heads at the stunning step.

39. Peeling silicone was observed in the passage between the chiller and the boning room above the carcass rail.

54. The CCA allows for the slaughter of non-ambulatory disabled cattle during the slaughter process of US- eligible cattle on the same slaughter line. However, non-ambulatory disabled carcasses are segregated at the chiller and throughout the boning process. Non-ambulatory disabled cattle are not eligible for export to the United States.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	9/15/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
JBS S/A RDV BR 060 Sn Km 359.8 Margem Direita, Zona Rural Campo Grande Mato Grosso do Sul	09/16/2022	SIF4400	Brazil
	5. NAME OF AUDITOR(S) OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		**Part E - Other Requirements**	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
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.		**Part F - Inspection Requirements**	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		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	
Part D - Sampling Generic *E. coli* Testing		55. Post Mortem Inspection	
27. Written Procedures		**Part G - Other Regulatory Oversight Requirements**	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57.	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	

60. Observation of the Establishment

52. The CCA allows for the slaughter of non-ambulatory disabled cattle during the slaughter process of US- eligible cattle on the same slaughter line. However, non-ambulatory disabled carcasses are not eligible for export to the United States and their carcasses are segregated at the chiller and throughout the deboning process.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/16/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Minerva S/A Rod. Go 050, Km 41 S/N Zona Rural Palmeiras de Goias Goiás	09/19/2022	SIF 431	Brazil
	5. NAME OF AUDITOR(S) OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	X
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	Raw intact and non-intact beef

60. Observation of the Establishment

10. Government inspection personnel did not observe carcasses contacting each other after the SIF inspection station and prior to the reinspection/rail out station, where cross-contamination could potentially occur.

14. Government inspection personnel did not identify that a hazard analysis was not conducted for the SIF inspection step identified in the flow chart.

54. The CCA allows for the slaughter of non-ambulatory disabled cattle during the slaughter process of US- eligible cattle on the same slaughter line. However, non-ambulatory disabled carcasses are segregated at the chiller and throughout the boning process. Non-ambulatory disabled cattle are not eligible for export to the United States.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	9/19/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Marfrig Alimentos S.A. Rod. BR 267 Km 35 Distrito Industrial Bataguassu São Paulo	09/19/2022	SIF4238	Brazil
	5. NAME OF AUDITOR(S) OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	

60. Observation of the Establishment

19. Government inspection personnel did not ensure that the steam spray wash (an antimicrobial intervention) of carcasses was properly validated.

52. The CCA allows for the slaughter of non-ambulatory disabled cattle during the slaughter process of US- eligible cattle on the same slaughter line. However, non-ambulatory disabled carcasses are not eligible for export to the United States and their carcasses are segregated at the chiller and throughout the deboning process.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/19/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
JBS S/A Andradina São Paulo	09/20/2022	SIF385	Brazil
	5. NAME OF AUDITOR(S) OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		**Part E - Other Requirements**	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
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.	X	43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		**Part F - Inspection Requirements**	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		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	
Part D - Sampling Generic *E. coli* Testing		55. Post Mortem Inspection	
27. Written Procedures		**Part G - Other Regulatory Oversight Requirements**	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57.	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	

60. Observation of the Establishment

10. After observing government inspection personnel conduct pre-operational sanitation inspection in the slaughter and processing rooms, the FSIS auditor found the following:
(a) The water hose near the carcass splitting was in advanced disrepair.
(b) Numerous black specks and dried blood residue were observed at the inspection station of carcasses for suspicious animals.
(c) Three dead insects found on table near viscera table in slaughter floor during pre-operational sanitation verification and one dead insect was observed during operation in the beef extract processing room.
(d) Rust buildup was observed on the overheard structures throughout the beef extracts processing area.

16. The recorded corrective action for a temperature deviation from a critical limit did not include preventive measures (Beef Extract HACCP).

52. The CCA allows for the slaughter of non-ambulatory disabled cattle during the slaughter process of US- eligible cattle on the same slaughter line. However, non-ambulatory disabled carcasses are not eligible for export to the United States and their carcasses are segregated at the chiller and throughout the deboning process.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/20/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Meat Snack Partners DO Brazil, Ltd.	09/21/2022	SIF260	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Beef processing.
Prepared Products:	

60. Observation of the Establishment

11. The establishment uses Alternative 3 to control *Listeria* in its ready-to-eat products. However:

(a)The *Listeria* control program does not identify the hold and test procedures following a positive test of a food-contact surface for *Listeria* spp.

(b) The *Listeria* control program does not identify the size of the food-contact surfaces to be sampled.

(c)The *Listeria* control program does not include an explanation of why the testing frequency is sufficient to ensure that effective control of *Listeria monocytogenes* or *Listeria* spp. is maintained.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/21/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Minerva S/A Rod. MT 130 KM 03 Paranatinga MT	09/21/2022	SIF2500	Brazil
	5. NAME OF AUDITOR(S) OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		**Part E - Other Requirements**	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	X
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
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.		**Part F - Inspection Requirements**	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		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	X
Part D - Sampling Generic *E. coli* Testing		55. Post Mortem Inspection	
27. Written Procedures		**Part G - Other Regulatory Oversight Requirements**	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57.	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	Raw intact and non-intact beef

60. Observation of the Establishment

38. Government inspection personnel did not identify multiple flies on the slaughter floor in the head inspection area and a gap between a roll up door and the floor in the shipping dock area.

54. The CCA allows for the slaughter of non-ambulatory disabled cattle during the slaughter process of US- eligible cattle on the same slaughter line. However, non-ambulatory disabled carcasses are segregated at the chiller and throughout the boning process. Non-ambulatory disabled cattle are not eligible for export to the United States.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/21/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
JBS S/A Lins São Paulo	09/22/2022	SIF337	Brazil
	5. NAME OF AUDITOR(S) OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
58.	
59.	

Establishment Operations:	Beef processing.
Prepared Products:	

60. Observation of the Establishment

39. Rust buildup was observed on food-contact surfaces of a seamer for 12 lbs. cans and on the structures above the retorts for 12 oz cans.

22. The process schedules for large and small cans were not posted in a conspicuous place in the thermal processing areas.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/22/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Marfrig Alimentos S/A Promissao São Paulo	09/23/2022	SIF2543	Brazil
	5. NAME OF AUDITOR(S) OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP	x	33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		**Part E - Other Requirements**	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
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.		**Part F - Inspection Requirements**	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		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	
Part D - Sampling Generic *E. coli* Testing		55. Post Mortem Inspection	
27. Written Procedures		**Part G - Other Regulatory Oversight Requirements**	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57.	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	

60. Observation of the Establishment

7. The establishment uses Alternative 3 to control *Listeria* in its ready-to-eat products. However, the *Listeria* control program does not include an explanation of why the testing frequency is sufficient to ensure that effective control of *Listeria monocytogenes* or of indicator organisms is maintained.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/23/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
JBS S/A BR 364 KM 18 Vilhena RO	09/23/2022	SIF4333	Brazil
	5. NAME OF AUDITOR(S) OIEA International Audit Staff (IAS)		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	X
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	X
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. STEC Sampling	X
58.	
59.	

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	Raw intact and non-intact beef

60. Observation of the Establishment

42. Government inspection personnel did not observe that the handwash sinks had a significantly high water pressure which provided inadequate handwashing that could potentially contaminate clothing coming into contact with product.

54. The CCA allows for the slaughter of non-ambulatory disabled cattle during the slaughter process of US- eligible cattle on the same slaughter line. However, non-ambulatory disabled carcasses are segregated at the chiller and throughout the boning process. Non-ambulatory disabled cattle are not eligible for export to the United States.

57. Government inspection personnel did not identify that the establishment was collecting interior surfaces of meat for its N60 sampling, which was not in accordance with its written procedures which require sampling of the exterior surface of the meat.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/23/2022

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Cooperativa Central Oeste Catarinense Rua Aury Luiz Bodanese 401 E Barrio Eufapi Chapeco Santa Catarina	09/26/2022	SIF3548	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

Establishment Operations:	Pork slaughter and processing.
Prepared Products:	

60. Observation of the Establishment

7. The official verification of the design of the SSOP program conducted during the quarterly documentary review does not include a recording of the verification results regarding the frequency of operational sanitation and pre-operational procedures and frequencies.

8. Establishment Quality Assurance personnel conduct and documents operational sanitation checks during shift change not during operation.

19. The official verification of the design of the HACCP plan conducted during the quarterly documentary review does of include a recording of the verification results of the reassessment requirement.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	09/26/2022

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

MINISTÉRIO DA AGRICULTURA E PECUÁRIA
SECRETARIA DE COMÉRCIO E RELAÇÕES INTERNACIONAIS
COORDENACAO GERAL DE GESTAO DOS ADIDOS AGRICOLAS
ADIDO EUA

Official Letter n. 09/2024/WAS

Washington, D.C., March 5, 2024.

Mrs. Margaret Burns Rath
Acting International Coordination Executive
Office of International Coordination
Food Safety and Inspection Service - FSIS/USDA

Subject: United States of America. Exports. Bovines and swine. International Veterinary Audit. FSIS/USDA. Maintenance of system equivalence. Action Plan.

Dear Mrs. Burns Rath,

1. I refer to Official Letter No. 001/2024 and its documents, as reproduced in Attachment I, in which the Agricultural Counselor of the Embassy of the United States of America in Brazil, Mr. Michael Conlon, shares the FSIS letter related to the draft of the final report of the on-site verification audit of Brazil's meat inspection system, conducted in September 2022.
2. In this context, I share with you the response elaborated by the technical area of the Brazilian Ministry of Agriculture and Livestock (MAPA) to the draft of the final report of the aforementioned audit, as reproduced in Attachments II through IV.
3. I also inform that, according to the technical area of MAPA, the updated version of the document "*Consolidated Supplementary Requirements for Export to the United States of America*" is currently being translated and will be forwarded as soon as possible.

ANA LÚCIA DE PAULA VIANA

Agricultural Attaché

Embassy of Brazil in Washington

Documento assinado eletronicamente por **ANA LUCIA DE PAULA VIANA**, **Adido(a) Agrícola**, em 05/03/2024, às 17:33, conforme horário oficial de Brasília, com fundamento no art. 4º,§ 3º, do Decreto nº 10.543, de 13 de novembro de 2020.

3006 Massachusetts Avenue NW – Phone: (202)238-2775
Zip Code 20008, Washington, D.C.

Referência: Processo nº 21000.003441/2022-57 SEI nº 34022419