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JUL 08 2015

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Servicio Agricola y Ganadero (Agricultural and Livestock Service)
Ministerio de Agricultura (Ministry of Agriculture)
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Dear Dr. Gómez Meza:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Chile's meat and poultry inspection system from February 17 through March 7, 2014. Enclosed is a copy of the final audit report. The comments received from the Government of Chile are included as an attachment to the report.

For technical questions regarding the FSIS audit, please contact Dr. Shaukat H. Syed at telephone number (202) 720-8609, by facsimile at (202) 720-0676, or electronic mail at international.audit@fsis.usda.gov.

If you have any other questions, please feel free to contact me directly.

Sincerely,

Jane H. Doherty

Jane H. Doherty
International Coordination Executive
Office of International Coordination

Enclosure

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FINAL REPORT OF AN AUDIT CONDUCTED IN CHILE

February 17 to March 7, 2014

EVALUATING THE FOOD SAFETY SYSTEM GOVERNING THE PRODUCTION OF MEAT AND POULTRY PRODUCTS INTENDED FOR EXPORT TO THE UNITED STATES OF AMERICA

July 8, 2015
Food Safety and Inspection Service
United States Department of Agriculture

Executive Summary

This report describes the outcome of an on-site equivalence verification audit conducted by the Food Safety and Inspection Service (FSIS) from February 17 to March 7, 2014, to determine whether Chile's food safety inspection system governing the production of meat and poultry remains equivalent to that of the United States with the ability to produce products that are safe, wholesome, unadulterated, and properly labeled. Chile is eligible to export raw and processed meat and poultry products to the United States.

The audit focused on six main system equivalence components: (1) Government Oversight (Organization & Administration), (2) Statutory Authority and Food-Safety Regulations (Inspection System Operation and Product Standard), (3) Sanitation, (4) Hazard Analysis and Critical Control Points (HACCP) Systems, (5) Government Chemical Residue Control Programs, and (6) Government Microbiological Testing Programs. In addition, the auditor verified that the corrective actions proffered by the Central Competent Authority (CCA) in response to the April 2012 FSIS audit findings were being implemented.

The 2012 audit outcome showed that the CCA met the established criteria. However, government oversight needed improvement concerning net weight program, sanitation implementation and verification, HACCP verification, and generic *Escherichia Coli (E. coli)* testing criteria.

The FSIS auditor reviewed management, supervision, and administrative functions at the CCA headquarters, three regional offices, four slaughter and processing establishments, and one government laboratory to verify that the national system of inspection, verification, and enforcement was being implemented as required to maintain equivalence.

The 2014 audit results show that, while the CCA's food safety inspection system is generally operating at an "adequate" level of performance, there are significant specific government weaknesses regarding implementation of sanitation, HACCP, post-mortem inspection, and RTE verification sampling and testing that, if not expeditiously addressed, could affect Chile's on-going equivalence.

During the exit meeting on March 7, 2014, the CCA noted that it has already begun to address the audit findings by implementing immediate corrective actions for the short-term and long-term prevention of recurrence of on-site audit findings. FSIS will evaluate any information provided by the CCA including the submission of the CCA's proposed corrective actions in response to the audit findings to assess the effectiveness of the corrective actions. FSIS expects the CCA response within 60 days of the issuance of this report.

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I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) conducted an on-site equivalence verification audit of Chile's meat and poultry inspection system from February 17 to March 7, 2014.

Chile is eligible to export raw and processed meat and poultry products to the United States. Between January 1, 2012, and December 31, 2013, Chile exported approximately 103,105,044 pounds of meat and poultry products to the United States. A total of 462,847 pounds was rejected at Point of Entry (POE) and reported the result of miscellaneous labeling issues, shipping damage, and physical failure (6,964 pounds) or implicated in a voluntarily recall initiated by Chile due to Dioxin contamination (190,494 pounds).

Animal and Plant Health Inspection Service (APHIS) recognized Chile as free of African Swine Fever and Exotic Newcastle's Disease; free of Classical Swine Fever, Foot and Mouth Disease and Swine Vesicular Disease with Special Restrictions; and also classified Chile as "negligible risk " by the World Organization for Animal Health (OIE) for Bovine Spongiform Encephalopathy.

This audit was conducted pursuant to the specific provisions of the United States laws (U.S. Code , U.S.C.) and regulations (Code of Federal Regulations, CFR), in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.)
- The Humane Methods of Livestock Slaughter Act (7 U.S.C. 1901-1906)
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/Hazard Analysis and Critical Control Point (PR/HACCP) regulations
- The Poultry Products Inspection Act (21 U.S.C. 451 et seq.)
- The Poultry Products Inspection Regulations (9 CFR Part 381)

The audit standards applied during this audit included all applicable legislation originally determined by FSIS as equivalent as part of the initial equivalence process, and any subsequent equivalence determinations that have been made under provisions of the Sanitary/Phytosanitary Agreement.

Currently, Chile has equivalence determinations in place for the following:

- For generic *Escherichia coli (E. coli)*: four sampling sites for cattle and swine
- For *Salmonella*:
    - Year-round, on-going testing
    - Immediate corrective actions required by establishments that display positive result, followed by additional sampling by the Servicio Agricola y Ganadera (SAG) to verify the effectiveness of the establishment's corrective actions
    - Four sampling sites for cattle and swine
        - 400 cm2 are sampled, 100 cm2 from each sampling site
    - Sample analysis by private laboratories

- For *Listeria monocytogenes (Lm)*:
    - The *Lm* control program
    - Screening method for RTE in meat and poultry VIDAS *Lm* Xpress (03/09/11)
    - Detection and confirmation method VIDAS LMO2 (07/06/09)
- For *E. coli* O157:H7:
    - The National Program for *E. coli* O157:H7
        - Screening method VIDAS ECO (07/08/09)
        - Confirmatory method VIDAS ICE (07/08/09)
        - Screening method in RTE meat VIDAS ECPT (03/09/11)

II. AUDIT GOAL AND OBJECTIVES

FSIS' overall goal for the audit was to verify that Chile's food safety inspection system governing meat and poultry products continues to be equivalent to that of the United States, with the ability to produce and export products that are safe, unadulterated, wholesome, and properly labeled. To achieve this goal, the audit focused on six equivalence components to determine whether each component continues to be equivalent to that of the United States: (1) Government Oversight (Organization & Administration), (2) Statutory Authority and Food Safety Regulations (Inspection System Operation and Product Standard), (3) Sanitation, (4) Hazard Analysis and Critical Control Points (HACCP) Systems, (5) Government Chemical Residue Control Programs, and (6) Government Microbiological Testing Programs.

In addition, the FSIS auditor verified that the corrective actions proffered by the Central Competent Authority (CCA), SAG, in response to the April 2012 FSIS audit were being implemented with the exception of non-O157 Shiga-toxin producing *E. coli* testing program. The CCA stated that it has been evaluating different non-O157 Shiga-toxin producing *E. coli* testing methods in order to select the most appropriate testing methodology. The 2012 audit findings included: the lack of written program for net weight, inconsistent application of implementation and verification of sanitation requirements, problems meeting HACCP record keeping requirements, and deficiencies in microbiological testing programs (generic *E. coli* and non-O157 Shiga-toxin producing *E. coli*). On February 28, 2014, the CCA submitted its non-O157 Shiga-toxin producing *E. coli* testing program to FSIS for verification that the STEC program meets FSIS equivalence criteria.

III. AUDIT METHODOLOGY

FSIS utilized its established four-phase process to conduct this equivalence verification audit: plan, execution (on-site), evaluation, and feedback. Each phase is described below.

The first phase is a document and data review and analysis of previous audit findings and other available information. Therefore, prior to conducting the February 2014 on-site audit, FSIS examined the CCA's performance within the six equivalence components, data on exported product types and volumes, POE testing results, and other data collected since the last FSIS audit in 2012. In addition, the FSIS auditor reviewed information obtained directly from the CCA, through a Self-Reporting Tool (SRT). This comprehensive analysis served as the basis for planning the on-site audit itinerary.

The second phase is the on-site audit or execution phase. FSIS conducted this on-site audit to verify the CCA's oversight activities as they relate to each equivalence component. The auditor gathered data on

all six components through document reviews, interviews, observations, and site visits. The FSIS auditor was accompanied throughout the audit by representatives from the CCA.

Management, supervision, and administrative functions were reviewed at the CCA headquarters, Regional Office for Region XII (Magallanes y Antartica Chilena), Regional Office for Region X (Los Lagos), Regional Office for Region VI (Libertador Bernardo O Higgins), four slaughter and processing establishments (one porcine, one ovine, one poultry, and one bovine slaughter and processing) and one government laboratory to verify that the national system of inspection, verification, and enforcement was being implemented as required to maintain equivalence. Chile exported a total of 117 pounds of ready-to-eat (RTE) products in calendar year 2013 from one processing establishment. The CCA removed this establishment from the list of the United States-eligible establishments in January of 2014. During the establishment visits, the auditor paid particular attention to the extent to which the government and industry interact to control hazards and prevent program deficiencies that may threaten food safety, with an emphasis on the CCA's ability to provide oversight through supervisory reviews conducted in accordance with Title 9 Code of Federal Regulations (CFR) 327.2 and 381.196.

FSIS visited the CCA central reference laboratory, a government laboratory located at Lo Aguirre, Santiago, which is conducting analytical testing as part of Chile's national residue program as well as microbiological testing of official samples. During this laboratory review, the FSIS auditor interviewed the inspection personnel to assess the CCA's oversight activities for implementation of approved chemical residue and microbiological testing programs and reviewed the CCA's annual audit reports of other approved laboratories.

The third phase of the audit is evaluation. FSIS conducted an evaluation of all data collected during the on-site audit through direct observations, record review, and interviews to determine whether the CCA's performance is consistent with the information provided to FSIS in the SRT and other submitted documents. FSIS conducted an exit meeting with the CCA representatives to convey all findings and discuss next steps.

The final phase of the audit is feedback, which begins with this draft audit report providing the CCA with an opportunity for comment. After reviewing the CCA's comments and responses to all findings, FSIS prepares a final report. Then, FSIS and the CCA mutually develop an action plan to address any issues raised by the audit. These issues will be tracked by FSIS until resolution and will be automatically included as areas of special emphasis in the next on-site verification audit.

IV. COMPONENT ONE: GOVERNMENT OVERSIGHT (ORGANIZATION & ADMINISTRATION)

The first of the six equivalence components reviewed was Government Oversight. The FSIS' import eligibility requirements state that an equivalent foreign inspection system must be designed and administered by the national government of the foreign country with standards equivalent to those of the United States' meat and poultry inspection system. The evaluation of this component included a review of documentation submitted by the CCA as support for the responses and corrective actions, as well as on-site record reviews, interviews, and observations made by the FSIS auditor at government offices and in the audited establishment.

FSIS has recognized that the CCA's inspection system is equivalent based on the CCA's implementation of Chile's food safety laws and regulations, verification of the effectiveness of industry process controls, detection of non-compliances, and timely enforcement. During the on-site audit, the FSIS auditor noted a few isolated deficiencies that were not sufficient to raise questions about Chile's equivalence. The CCA instructed its inspection personnel to take immediate corrective actions to address the deficiencies that the auditor did find. These findings are further discussed in this report.

The CCA has the responsibility for carrying out Chile's inspection program, including oversight of the enforcement of Chile's regulatory requirements in meat and poultry establishments certified by the CCA as eligible to export to the United States and in residue and microbiology laboratories in which US-eligible product is analyzed. The CCA's oversight of its meat and poultry inspection system consists of four levels: central, regional, local, and establishment.

The CCA's inspection responsibilities are managed from 15 Regional Offices (RO). Each RO has one or two Regional Supervisors (RS) who conduct periodic supervisory reviews. There are 65 local offices under these 15 ROs. In each local office, an official veterinary officer serves as a field supervisor over the official veterinarians assigned in the establishments. The local offices manage the administrative oversight of the inspection teams in the establishments. At the establishment level, the Official Veterinary Inspector (OVI) is responsible for all of the inspection activities at that establishment. There are a number of additional veterinarians and non-veterinary inspectors under the OVI in each slaughter establishment.

The CCA has established a minimum of at least one supervisory review every four months for export slaughter establishments and at least once every six months for export processing establishments. All three audited regions met the CCA's established frequency. The RS in region VI conducts the periodic supervisory reviews on a monthly basis because of the Regional Office's risk-based evaluation of its exporting establishment's size and production level. The FSIS auditor reviewed a number of the periodic supervisory reviews for all of the United States-eligible establishments in each of the audited regions. These reviews were recorded on a standard form and included a follow-up section regarding the previous supervisory review findings.

During the on-site audit of four slaughter and processing establishments, the FSIS auditor accompanied and observed the function of RSs responsible for conducting the periodic supervisory reviews. During these periodic reviews, the inspection personnel (RS) verifies requirements for ante-mortem inspection, humane handling and slaughter, post-mortem inspection, *Salmonella* and generic *E. coli* sample collection, verification of pre-operational and operational sanitation monitoring procedures, and HACCP verification activities including the zero tolerance CCP verification. The overall sanitary condition of the audited establishments on the day of the on-site audit are the same as documented in the supervisory periodic review reports except those conditions that are currently being reported as audit findings.

The FSIS auditor also reviewed in-plant inspection documentation of daily activities and interviewed in-plant inspection personnel. The FSIS auditor verified that in-plant inspection personnel at all four audited establishments conduct ante-mortem inspection on the day of slaughter by reviewing the incoming registrations and identification documents. The inspection personnel also observed all animals (bovine, porcine, and ovine slaughter establishments) from both sides at rest and in motion in designated holding pens prior to slaughter in order to determine whether they were fit for slaughter and for human

food purposes. The designated holding pen for sick or suspect animals was maintained in each establishment audited for further examination of these animals, as needed.

The FSIS auditor verified that in-plant inspection personnel in the audited poultry slaughter establishment follow the CCA's instructions regarding ante-mortem inspection. The official inspector must have a report of origin for the birds issued by a registered veterinarian in order to determine the lot designation and to give guidelines for the post-mortem inspection. This report must arrive at least 72 hours before the date of bird slaughtering. The FSIS auditor observed that the audited slaughter establishment has a shaded and ventilated area for holding birds before entering the slaughterhouse. The official inspector examines all the trucks to assess the soundness of the birds for slaughter by observing flock health condition. This requirement is cited in "Instructions to apply veterinary inspection procedures to poultry and their meat for exporting purposes."

The FSIS auditor also assessed post-mortem inspection examinations through on-site record reviews, interviews, and observations of in-plant inspection personnel performing post-mortem examinations in the one poultry slaughter and processing and three red meat establishments audited. The FSIS auditor observed and verified that Chilean inspection personnel are implementing proper presentation, identification, examination, and disposition of carcasses and parts. In the red meat slaughter and processing establishments, the FSIS auditor observed the performance of the in-plant inspection personnel as they examined the heads, viscera, and carcasses to ensure that the proper incision, observation, and palpation of required organs and lymph nodes is done in accordance with Chile's requirements.

In the poultry slaughter establishment, the FSIS auditor observed that in-plant inspection personnel followed post-mortem inspection procedures in accordance with the CCA's document entitled "Instructions to apply veterinary inspection procedures to poultry and their meat for exporting purposes." The FSIS auditor also noted that the audited establishment meets post-mortem facility requirements including such equipment as a distortion-free mirror, sufficient shadow-free lighting, on-line hand rinsing facilities, hang back racks, a receptacle for condemned carcasses and parts, and start/stop switches. This establishment has two operational slaughter lines. Each slaughter line is staffed with four in-plant inspection personnel and establishment helpers. Each inspector conducts post-mortem carcass inspection in compliance with the CCA requirements by inspecting the outside surfaces, inside surfaces (abdominal cavities), and viscera of 100% of the birds presented for inspection. In response to the FSIS auditor's question about line speed, the inspection personnel stated that the poultry slaughter line speed was at a rate of 45 birds per minute per inspector on the day of the audit. This is a faster line speed than is prescribed in the FSIS regulations. A similar finding is noted in the 2009 FSIS final audit report of Chile's meat and poultry inspection system. The 2009 FSIS audit reported that the line speed was at a rate of 50 birds per minute per inspector for this establishment. As part of the CCA's proposed corrective actions for the 2009 audit findings, the CCA provided assurances that the line speed would be maintained at the rate of 35 birds per minute per inspector. FSIS expects that the CCA will adhere to its previous commitment regarding the line speed or request for an equivalency determination prior to any changes in its established requirements. Given the current state of the record, if the CCA fails to reduce line speeds in plants that ship to the U.S. to 35 birds per minute forthwith, FSIS would have to reconsider Chile's on-going equivalence.

The FSIS auditor also observed the functions of the off-line inspectors who conduct daily inspection verification activities in all four audited establishments. These daily verification activities were being conducted properly. They included direct observation and review of establishment records, including HACCP, Sanitation Standard Operating Procedures (SSOP), Sanitation Performance Standards (SPS), and generic *E. coli* sampling techniques and records.

Since the last FSIS audit in 2012, the CCA has provided ongoing training programs to its inspection personnel. FSIS interviewed a number of the inspection personnel to assess their knowledge, skills, and abilities and reviewed their training records. In addition, the FSIS auditor observed in-plant inspection personnel and laboratory personnel while they were conducting their inspection activities. The FSIS auditor verified that both in-plant inspection and laboratory personnel have attended the ongoing training and have sufficient training in performing most of the inspection activities. The CCA provided the 2013 and 2014 training topics to FSIS.

The analysis and on-site verification activities indicate that the CCA continues to maintain its equivalence status subject to the concern expressed above. Therefore, the CCA continues to operate at an "adequate" level of performance for this component.

V. COMPONENT TWO: STATUTORY AUTHORITY AND FOOD SAFETY REGULATIONS (INSPECTION SYSTEM OPERATION AND PRODUCT STANDARD)

The second of the six equivalence components that the FSIS auditor reviewed was Statutory Authority and Food Safety Regulations. The inspection system must provide an appropriate regulatory framework to demonstrate equivalence with FSIS' requirements, including but not limited to HACCP, sanitation, chemical residue and microbiological sampling, humane handling and slaughter, ante-mortem inspection, post-mortem inspection, establishment construction, facilities, equipment, daily inspection, and periodic supervisory reviews to the establishments certified to export to the United States.

The evaluation of this component included an analysis of information provided by the CCA through SRT, interviews, and observations during the on-site portion of the audit.

During the CCA's headquarters audit, the FSIS auditor verified the regulatory authority maintained by the CCA as outlined in official legislation, regulations, and other instructions issued in accordance with:

- Standard 62 (General Technical Standards on Veterinary Inspection of Livestock for Food and Meat with Aptitude Qualification Criteria for Human Consumption);
- Law 20380 (Animal Protection);
- Fax 523-09 (Animal Welfare in Bovine, Ovine and Swine Establishments);
- Technical Standard No. 62 (Veterinary Inspection of Poultry and their Meats);
- Instructions to Apply Veterinary Inspection Procedures to Poultry and Their Meat for Exporting Purposes);
- Instruction for SAG livestock programs supervision (December 27, 2013); and
- Resolution 5992-2010 (Resolution Setting Health Measures for the Destruction of Ruminant Offal).

The following laws, regulations, and resolutions provide the CCA with the legal authority to oversee production activities of establishments that intend to export meat and poultry products to the United States:

- Law 18755 (Organic Law of the Agriculture and Livestock Service);
- Law 19.162 (Establishment of the Mandatory System for the Classification of Livestock, the Identification and Naming of Meat, and the Regulation of the Operation of Slaughterhouses, Refrigerators and Plants for the Meat Industry);
- Decree 39-2013 (Approves Regulations Regarding Slaughterhouses, Refrigerating Establishment, Refrigerating Chamber and Butchering Plant Structure and Operations and Establishes Minimum Equipment Requirements for Those Establishments);
- I-CER-AEE-PP-001-version 1(Instruction for registration of human consumption livestock products for export);
- I-CER-AEE-PP-002-version 3 (Instruction for eligibility of human consumption livestock products for third countries);
- I-CER-VCP-PP-version 4 (Instruction for livestock exportation inspection);
- Resolution 1767-2009 (Creation of the Under-Department of Animal Health);
- Resolution 2592-2003 (Requirements for the Health Inspection and Certification of Exports of Edible Products and By-products of Animal Origin);
- Supreme Decree 94 (Approves regulations regarding the structure and functioning of Slaughterhouses, Refrigerating Chambers and Butchering Plants and establishes minimum equipment requirements for those establishments); and
- Resolution 1045 (Establishes specific requirements for Prerequisite programs and HACCP for the implementation of the system that guarantees quality and replaces resolution N° 4577 from 2012).

The analysis and on-site verification activities indicate that the CCA continues to maintain equivalence and is operating at an "adequate" level of performance for this component.

VI. COMPONENT THREE: SANITATION

The third of the six equivalence components that the FSIS auditor reviewed was Sanitation. An equivalent inspection system must provide requirements for all areas of sanitation, sanitary handling of products, and the development and implementation of SSOP.

The evaluation of the sanitation component included an analysis of information provided by the CCA through the SRT, interviews, and observations during the on-site portion of the audit. The CCA's sanitation requirements are contained in the following documents:

- Resolution 2592-2003 (Establishment of the requirements for the health inspection and certification of exports of edible products and by-products of animal origin);
- Instruction for the application of veterinary inspection procedures for poultry and meat exports;
- General documentation of quality assurance verification in exporting slaughter establishments;

- Supreme Decree 94 (Approves regulations regarding the structure and functioning of Slaughterhouses, Refrigerating Chambers and Butchering Plants and establishes minimum equipment requirements for those establishments); and
- Resolution 1045 (Establishes specific requirements for Prerequisite programs and HACCP for the implementation of the system that guarantees quality and replaces resolution N° 4577 from 2012).

The FSIS auditor verified that the in-plant personnel conduct verification of sanitary conditions in accordance with the above requirements.

The FSIS auditor reviewed sanitation plans and records related to the design and implementation of sanitation programs at the audited establishments. The FSIS auditor verified the pre-operational inspection by shadowing and observing the in-plant inspector conducting pre-operational sanitation verification inspection. The in-plant inspection personnel's hands-on verification procedures started after the establishment had conducted its pre-operational sanitation and determined that the facility was ready for the in-plant inspector's pre-operational sanitation verification activities. The in-plant inspection personnel conducted this activity properly and in accordance with the established equivalent procedures.

The FSIS auditor also followed the off-line inspector and observed in-plant inspection verification of operational sanitation procedures at all of audited establishments. These verification activities include direct observation of operations and review of the establishments' associated records. The FSIS auditor reviewed the establishments' sanitation monitoring and corresponding inspections' verification records for the same time period. The auditor noted that the inspection and establishment records mirrored the actual sanitary conditions of the establishment. The audited establishments maintained sanitation records sufficient to document the implementation and monitoring of the SSOP and any corrective actions taken. The establishment employees responsible for the implementation and monitoring of the SSOP procedures properly authenticated these records with initials or signatures and the date.

The FSIS auditor did not observe any systemic sanitation issues; however, several sanitation deficiencies involving facility construction were observed at two establishments. The auditor observed gaps between the ceiling and protruding metal bars linking the facility structures in the ceiling above exposed products and food contact surfaces in the cutting room.

These structural problems do not comply with Chile's Decree N° 94/2008 (facility structure requirements). These instances represent cases where inspection personnel have not adequately enforced the CCA's construction and maintenance-related requirements. The FSIS auditor did not note any direct product contamination because of these deficiencies. The CCA informed the FSIS auditor that these issues would be corrected and verified immediately in order to comply with the CCA requirements. FSIS will evaluate any information provided by the CCA including the submission of the CCA's proposed corrective actions to assess the effectiveness of the corrective actions. FSIS expects the CCA response within 60 days of the issuance of this report.

The analysis and on-site verification activities indicate that the CCA continues to maintain equivalence and is operating at an "adequate" level of performance for this component.

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

The fourth of the six equivalence components that the FSIS auditor reviewed was HACCP. The inspection system needs to require a HACCP plan or similar type of preventive control plan to maintain equivalence.

The evaluation of the HACCP component included an analysis of information provided by the CCA through SRT, interviews, and observations during the on-site portion of the audit. The CCA's HACCP requirements are contained in the following documents:

- Decree 94 (Approves Regulations Regarding Slaughterhouse, Refrigerating Establishment, Refrigerating Chamber and Butchering Plant Structure and Operations and Establishes Minimum Equipment Requirements for Those Establishments);
- Fax 5338 (2005 – Resolution Setting Health Measure for the Destruction of Ruminant Offal as Stated);
- Fax 1363 (Meat Exports to the United States), and Instructions on Official Verification and Self-Regulation of *E. coli* O157:H7 in Ground Beef, Trimming, Tenderized Meat, Marinated Meat, and Beef Hamburgers for Export to the United States;
- Resolution 1045 (Establishes specific Requirements of the Prerequisites Programs and HACCP for the Implementation of the system that guarantees the quality and replaces the resolution N° 4577 from 2012); and
- Resolution 2592 (Establishes requirements for inspection and sanitary certification for the exporting human consumption sub products and products).

The FSIS auditor verified through record review and observation that the in-plant inspection personnel at the certified establishment properly conduct daily verification of HACCP plans in accordance with the methodology described in the above documents, which included the evaluation of written HACCP programs, monitoring, verification, corrective actions, recordkeeping, and hands-on verification inspection. The in-plant daily inspection verification included Critical Control Points (CCP) verification with results entered in in-plant inspection records.

The FSIS auditor visited three regional offices and audited four meat and poultry slaughter and processing establishments to determine whether the CCA maintained adequate government oversight for the implementation of HACCP requirements. FSIS also assessed the adequacy of HACCP program verification activities conducted by inspection personnel and establishment management at all four audited establishments. The auditor observed in-plant inspection verification activities and reviewed the monitoring and verification records generated by the establishments' operators and in-plant inspection personnel. The auditor noted that the in-plant inspection personnel at the four audited establishments conduct daily verification of the establishment's HACCP plans. This verification includes such activities as the evaluation of written HACCP programs and observing the establishment personnel perform monitoring, verification, corrective actions, and recordkeeping activities. The FSIS auditor reviewed the establishment's corrective actions in response to deviations from critical control point (CCP) critical limits and found that all four parts of the corrective actions are addressed in accordance with Chile's requirements and meet FSIS' equivalence criteria.

The FSIS auditor conducted an on-site observation and review of the zero tolerance control records generated over the past 12 months in all four audited establishments. In addition, the FSIS auditor reviewed the in-plant inspections' associated zero tolerance verification records at these establishments. Both establishment and in-plant inspection monitoring and verification records documented a few deviations from the critical limits. The review of the establishments' corrective actions in response to deviation from zero tolerance critical limits indicated that all four parts of the corrective actions were addressed by establishment employees and verified by the inspection personnel, in accordance with 9 CFR 417.3. No non-compliance trends were detected as the result of these document reviews. Furthermore, the FSIS auditor observed in-plant inspection personnel conducting hands-on HACCP verification activities for zero-tolerance CCP. No deviation from the critical limits was observed by the inspection personnel or the FSIS auditor. The FSIS auditor also verified that the zero tolerance CCP monitoring location meets the CCA's requirement, including adequate illumination for proper examination.

During the on-site document reviews and interviews of establishment and inspection personnel, the FSIS auditor identified several HACCP findings as follows:

- At the poultry establishment audited, the establishment's HACCP verification records did not document the time of verification activities.
- At the porcine establishment audited, the establishment's HACCP verification records for calibration of monitoring equipment did not document the time or bear the initial of the responsible establishment employee.
- At the ovine establishment audited:
    - The establishment's HACCP verification records for review of records component did not document the time or the results of the ongoing verification activities conducted by the establishment's personnel.
    - The establishment's HACCP plan did not include direct observation of monitoring procedures as part of its on-going verification activities.

The CCA informed the FSIS auditor that these issues would be corrected and verified immediately in order to comply with the CCA requirements.

The analysis and on-site verification activities indicate that the CCA continues to maintain equivalence and is operating at an "adequate" level of performance for this component.

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUES CONTROL PROGRAMS

The FSIS auditor reviewed Chemical Residue Control Programs as the fifth of the six equivalence components. The FSIS criteria for this component include the design and implementation of a program managed by the CCA that conducts effective regulatory activities to prevent chemical residue contamination of food products. To be equivalent, the program needs to include random sampling of muscle, internal organs, and fat of carcasses for chemical residues identified by the exporting countries and FSIS as potential contaminants. The inspection system must identify the laws, regulations, or other decrees that serve as the legal authority for the implementation of this program. The CCA must provide a description of its residue plan and the process used to design the plan; a description of the actions

taken to address unsafe residue as they occur; and oversight of laboratory capabilities and analytical methodologies to ensure the validity and reliability of test data.

The evaluation of this component included an analysis of information provided by the CCA through the SRT, interviews, and observations during the on-site portion of the audit. The FSIS auditor verified that the CCA manages the national residue program, including providing direction, coordination, and oversight. The auditor noted that the implementation of the plan at the headquarters, laboratory, regional, and in-plant levels is proceeding in the manner outlined in the plan, and that sampling is occurring on time and in the manner designated. Analyses are completed in a timely manner, and results are distributed as directed. Enforcement measures are delegated to another agency, Animal Health. All violative results are immediately reported to that agency, and Animal Health personnel act by retaining products, destroying products, launching recalls, farm quarantines, and risk communication plans as appropriate to the violative substance. Investigation is done at the farm level to determine the probable cause of the residue's presence. The field veterinarian doing the investigation focuses on the possession and use of veterinary drugs, the animal feed, and any environmental aspects. The field veterinarian also emphasizes to the private companies the proper use of veterinary drugs as the label prescribes, required time for the proper withdrawal period, and the necessity of a veterinary prescription for the use of the drug in food animals.

The on-site residue laboratory audit focused on the general capabilities of the central reference laboratory in providing oversight over other government and private laboratories certified to conduct chemical residue analysis within Chile. The residue laboratory network consists of one central, one regional, and nine private laboratories. The FSIS auditor visited the central reference laboratory located in Lo Aguirre, Santiago. This laboratory is accredited by the Chilean Accreditation Board (INN) according to ISO 17025. This laboratory is conducting the analysis of different chemical compounds in accordance with the national residue-monitoring program. This laboratory is also conducting species verification testing with a frequency of one test per year in accordance with the CCA requirements.

During the audit of the central laboratory's chemical residue section, the FSIS auditor interviewed the quality control department personnel, who conduct the annual audits of other government and private laboratories, and reviewed the previous year's (2013) annual audit reports of other certified residue laboratories that perform analysis of products that are destined for export to the United States. In addition, the FSIS auditor reviewed the laboratory audit form "Informe Auditoria" that the CCA applies to document its annual audit results and findings. This audit form includes such audit items as quality control and management systems, record keeping requirements, reception of samples, proficiency testing, equipment function, and analytical methods. FSIS reviewed the following residue laboratory audit reports during this on-site audit:

- Annual Audit of FAVET Laboratory, September 10, 2013. This is a private residue laboratory located in Santiago.
- Annual Audit of VIAMED Laboratory, September 12, 2013. This is a private residue laboratory located in Santiago.
- Annual Audit of ACTIVAQ Laboratory, October 9, 2013, and a follow up audit dated December 4, 2013. This is a private residue laboratory located in Santiago.
- Annual Audit of BDS Laboratory, August 29, 2013. This is a private residue laboratory located in Rancagua.

- Annual Audit of SGS Laboratory, March 13, 2013. This is a private residue laboratory located in Concepcion.
- Annual Audit of Commercial Analab Laboratory, August 27, 2013. This is a private residue laboratory located in Concepcion.

The FSIS auditor's review of these annual audit reports and corresponding follow-up reports found no concerns within the CCA's implementation of its chemical residue program.

The analysis and on-site verification activities indicate that the CCA continues to maintain equivalence and is operating at an "average" level of performance for this component.

IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS

The last of the six equivalence components that the FSIS auditor reviewed was Microbiological Testing Programs. This component pertains to the microbiological testing programs organized and administered by the CCA to verify that products destined for export to the United States are safe, wholesome, unadulterated, and meet all equivalence criteria.

The evaluation of this component included an analysis of information provided by the CCA through SRT, interviews, and observations during the on-site portion of the audit. The CCA has microbiological testing programs for generic *E. coli*, *Salmonella* in raw products, *E. coli* O157:H7 in ground beef and trimming of bovine, *Lm*, *Salmonella spp.*, and *E. coli* O157:H7 (bovine products only) in RTE products.

Testing for generic *E. coli*

The CCA has adopted the FSIS regulatory requirements for testing for generic *E. coli*, with the exception of electing four sampling sites on a carcass, which was determined to be equivalent by FSIS in 2005. The FSIS auditor accompanied and observed the in-plant inspection verification activities for *Salmonella* and generic *E. coli* sample collection. Sampling and testing for generic E. coli was conducted in accordance with Microbiological Sampling Procedure in export slaughter establishments P-PP-IT-I in all of the four audited establishments.

Testing for *Salmonella* species in raw products

FSIS has documented that the Chilean *Salmonella* sampling program is equivalent to that of FSIS. According to the General Document for Microbiological Sampling of Meat Carcasses in Slaughter Establishments for Export (D-CER-VPE-PP-003 Version 01), the presence of *Salmonella* spp. may indicate process control deficiency at a slaughter establishment. In slaughter establishments, carcasses are being sampled once a week (five samples) per the national plan. Set limits are established to be the same as those listed in 9 CFR 310.25. Each species has a set acceptance level of the number of positive samples allowed per set. Once the set exceeds the acceptance criteria, the set will automatically be considered as a FAIL. When a FAIL occurs, the inspection personnel issue a Non Compliance Notification (NCN) to the establishment. The establishment will have a maximum of 72 hours to carry out corrective actions in the response to the NCN. These corrective actions are to be communicated daily to the inspection personnel for verification. Following the implementation of the corrective actions (48 hours), the inspection personnel will take five samples every other day until 15 samples have been taken. The acceptance criteria for these 15 samples are designated according to species. If the acceptance criteria are reached, a new set of 50 samples is begun. If the acceptance criteria are not met,

the inspection personnel will generate a new NCN, and the establishment must carry out new corrective actions within 96 hours. After the new corrective actions have been in effect for 48 hours, the inspection personnel will take another five samples every other day to obtain a total of 15 samples. The acceptance criteria are the same as for the previous set of 15 samples. Again, if the acceptance criteria are met, a new set of 50 samples is begun. If the acceptance criteria are not met, the establishment has 96 hours to apply a contingency plan for cleaning and sanitization; carry out GMP, SOP and SSOP analyses at the establishment; reassess its HACCP Plan; and identify the cause and issue a Root Cause Report (as prescribed in the General Document for Microbiological Sampling in Exportation Slaughterhouses D-CER-VPE-PP-003 Version 01). After 48 hours of the implementation of corrective actions, the effectiveness of the corrective action will be verified by the inspection personnel through collecting 5 daily samples for *Salmonella* spp. The export certification may be suspended, when requirements are not met, in accordance with Resolution Nº 2592 (15/09/2003).

The testing program for *E. coli* O157:H7 and non-O157 Shiga-toxin producing *E. coli* in raw beef products

The testing program for *E. coli* O157:H7 in raw beef had previously been determined as equivalent by FSIS. The CCA samples raw beef trimmings and cuts designated for grinding by its established sampling frequencies and methods. The FSIS auditor verified through document review that the inspection personnel collect one sample per month in one audited bovine slaughter and processing establishment that exports beef trimmings to the United States. The in-plant inspection personnel have received training on sample collection described in *E. coli* O157:H7 Official Instructive. The official samples are analyzed in the government laboratory by a screening method (VIDAS UP O157:H7 AFNOR BIO 12/25-05/09 - VIDAS ECO AFNOR 12/08-07/00). The FSIS auditor verified that lots with positive results for *E. coli* O157:H7 are segregated and identified as "Not approved for export to the United States." During the course of the on-site audit and on February 28, 2014, the CCA submitted its non-O157 Shiga-toxin producing *E. coli* testing program to FSIS. FSIS determined that the information showed that the CCA met the equivalence criteria for control measures over non-O157 Shiga-toxin producing *E. coli*.

***Listeria monocytogenes* and *Salmonella* in RTE product**

Chile has three RTE-producing establishments that are eligible to export to the United States. However, none of these establishments exported any RTE products to the United States from 2013 to the present. Since no RTE producing establishments were selected to be audited in 2014, FSIS reviewed the CCA's verification sampling protocols related to RTE program at the CCA headquarters to verify ongoing equivalence of the RTE program for potential future shipment of RTE products to the United States.

Chile was notified in July 13, 2011, letter of immediate changes to the FSIS' equivalence criteria for the control program for *Listeria monocytogenes* in RTE products. FSIS' equivalence criteria for *Lm* in RTE products state that, on an ongoing basis, the CCA should verify the implementation and effectiveness of the control measures in each establishment certified for export to the United States by conducting verification sampling of post-lethality exposed RTE products, product contact surfaces, and the environment at a frequency that ensures that the establishments' control measures are effective. However, during the 2014 document review at the CCA's headquarters, the FSIS auditor identified that the CCA is not fully meeting RTE equivalence criteria because the CCA's current RTE verification program does not include ongoing sampling and testing of food contact surface (FCS) and environmental (non-food contact surface). The CCA's current RTE verification sampling program is

solely based on the official sampling of the finished product, which includes five samples per month for each microorganism *(Lm, Salmonella*, and *E. coli O157:H7* in bovine products), and was never revised to address criteria for the control program for *Listeria monocytogenes* in RTE products included in the July 13, 2011, letter. FSIS needs a response from the CCA within 60 days that demonstrates the effective implementation of equivalence criteria for the control program for *Listeria monocytogenes* in RTE products as outlined in the July 13, 2011, letter.

The document review showed that testing conducted under establishment's self-monitoring program includes product sampling for Alternative 1, product and product contact surface sampling for Alternative 2, and, product, product contact surface, and environment sampling for Alternative 3. Export certification will only be granted for batches of product that have tested negative.

During the central laboratory audit, microbiology section, the FSIS auditor interviewed the quality control department personnel, who conduct the annual audits of other government and private laboratories, and reviewed the previous years' (2012 and 2013) annual audit reports of other certified microbiology laboratories that perform analysis of products that are destined for export to the United States. FSIS reviewed the following microbiology laboratory audit reports during this on-site audit:

- Labser Microbiology Laboratory Annual Audit Reports, May 9-11, 2012, February 4, 2013, and August 21-22, 2013 (follow-up audit). This is a private microbiology laboratory located in Rancagua.
- University of Austral Microbiology Laboratory Annual Audit Reports, November 14-16, 2012 and December 9-11, 2013. This is a private microbiology laboratory located in Valdivia.
- Osorno Microbiology Laboratory Annual Audit Reports, November 11-13, 2012, and December 17, 2013. This is a government microbiology laboratory located in Osorno.
- Punta Arenas Microbiology Laboratory Annual Audit Reports, December 28, 2012, and September 26, 2013. This is a government microbiology laboratory located in Punta Arenas.
- SEMA Microbiology Laboratory Annual Audit Reports, December 17-19, 2012, and October 24-25, 2013. This is a private microbiology laboratory located in Santiago.

The FSIS auditor's review of these annual audit reports and corresponding follow-up reports found no concerns within the CCA's documentation of its audit results.

The analysis and on-site verification activities indicate that the CCA continues to maintain equivalence and is operating at an "adequate" level of performance for this component.

X. CONCLUSIONS AND NEXT STEPS

The 2014 audit results indicate that the CCA's food safety inspection system is performing at an "adequate" level meeting the core criteria for all six equivalence components. However, FSIS identified problems related to line speed and testing for Listeria as well as weaknesses related to sanitation and HACCP, that raise significant questions about the Chilean system's on-going equivalence to the United States' system.

During the exit meeting on March 7, 2014, the CCA noted that it has already begun to address the audit findings by implementing immediate corrective actions for the short-term and long-term prevention of recurrence of on-site audit findings. FSIS will evaluate any information provided by the CCA including

the submittal of the CCA's proposed corrective actions in response to the audit findings to assess the effectiveness of the corrective actions. FSIS expects the CCA response within 60 days of the issuance of this report.

APPENDICES

APPENDIX A: Individual Foreign Establishment Audit Checklist

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
Faenadora Rosario Ltda. Ruta H-50 Km. 04 Rosario	02/26/2014	06-06	Chile
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Nader Memarian, DVM		[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	
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. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Date: 02//26/2014 Est #: 06-06 (Faenadora Rosario Ltda. [S/P/CS]) (Rosario, Chile)

22/51: HACCP ongoing requirements based on [9 CFR part 417.5 and 417.8] and [Chile's Resolución Exenta N° 1045/2013: Establece exigencias especificas de los programas de prerequisitos y HACCP para la implementación del Sistema de Aseguramiento de Calidad y deroga Resolución N° 4577/2012. Servicio Agrícola y Ganadero. Ministerio de Agricultura (HACCP requirements)].

-The establishment's HACCP verification records for calibration of monitoring equipment did not document the time or initial of the responsible establishment employee.

39/51: Other requirements: [9CFR 416.4 and 416.17] and [Chile's Decreto N° 94/2008: Reglamento sobre estructura y funcionamiento de mataderos, establecimientos frigoríficos, cámaras frigoríficas y plantas de desposte y fija equipamiento mínimo de tales establecimientos. Ministerio de Agricultura (facility structure)].

- Numerous gaps between the ceiling and protruding metal bars holding attached structures observed in the ceiling above exposed products and food contact surfaces in the cutting room. This may create insanitary conditions and a potential for product contamination.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Nader Memarian. DVM	Nader Me 02-26-14

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
Faenadora San Vicente Carretera H-66 G San Vicente T.T.	02/25/2014	06-08	Chile
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Nader Memarian, DVM		[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	
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. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	X
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Date: 02/25/2014 Est #: 06-08 (Faenadora San Vicente [S/P/CS]) (San Vicente T.T., Chile)

22/51: HACCP ongoing requirements based on [9 CFR part 417.5 and 417.8] and [Chile's Resolución Exenta N° 1045/2013: Establece exigencias especificas de los programas de prerequisitos y HACCP para la implementación del Sistema de Aseguramiento de Calidad y deroga Resolución N° 4577/2012. Servicio Agrícola y Ganadero. Ministerio de Agricultura (HACCP requirements)].

- The establishment's HACCP verification records did not document the time of verification activities.

39/51: Other requirements: [9CFR 416.4 and 416.17] and [Chile's Decreto N° 94/2008: Reglamento sobre estructura y funcionamiento de mataderos, establecimientos frigoríficos, cámaras frigoríficas y plantas de desposte y fija equipamiento mínimo de tales establecimientos. Ministerio de Agricultura (facility structure)].

- Numerous gaps between the ceiling and protruding metal bars holding attached structures observed in the ceiling above exposed products and food contact surfaces in the cutting room. This may create insanitary conditions and a potential for product contamination.

55/51: Post-mortem Inspection: [9CFR 381.76]: line speed was at a rate of 45 birds per minute per inspector on the day of the audit. This is a faster line speed than is prescribed in the FSIS regulations.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Nader Memarian. DVM	Nader Mar 02-25-14

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
Frigosorno Fco.del Campo 200 Osorno	03/04/2014	10-26	Chile
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Nader Memarian, DVM		[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.	
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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	
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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	
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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. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment Date: 03/04/2014 Est #: 10-26 Frigosorno ([S/P]) (Osorno, Chile)

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

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Nader Memarian. DVM	03-04-14

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
Soc. Com. Jose Marin Antonin y Cia LTDA Los Calafates, No 0415, Sitio 7-11 Barrio Industrial Punta Arenas	02/21/2014	12-05	Chile
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Nader Memarian, DVM		[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.	
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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	
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. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment Date: 02/21/2014 Est #: 12-05 Soc. Com. Jose Marin ([S/P]) (Punta Arenas, Chile)

22/51: HACCP ongoing requirements based on [9 CFR part 417.5 and 417.8] and [Chile's Resolución Exenta N° 1045/2013: Establece exigencias especificas de los programas de prerequisitos y HACCP para la implementación del Sistema de Aseguramiento de Calidad y deroga Resolución N° 4577/2012. Servicio Agrícola y Ganadero. Ministerio de Agricultura (HACCP requirements)].

-The establishment's HACCP verification records for review of records component did not document the time or the results of the ongoing verification activities conducted by the establishment's personnel.

-The establishment's HACCP plan did not include direct observation of monitoring procedures as part of its on-going verification activities.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Nader Memarian. DVM	02-21-14

APPENDIX B: Chile's Response to Draft Final Audit Report

SAG
Ministerio de Agricultura
Gobierno de Chile

CARTA Nº 2162/2015

SANTIAGO, 17/04/2015

SEÑOR
SHAUKAT H. SYED
DIRECTOR INTERNATION AUDIT STAFF
OFFICE OF INVESTIGATION, ENFORCEMENT, AND AUDIT - FSIS

Estimado Sr. Shaukat H. Syed

Junto con saludar cordialmente, me permito enviar a usted los comentarios y acciones tomadas por el Servicio Agrícola y Ganadero a los hallazgos indicados en el borrador de informe final de auditoría realizada en Chile, entre febrero 17 y marzo 7 de 2014, donde se evaluó el sistema de inocuidad alimentaria que rige sobre la producción de productos de carne y aves de corral para su exportación a Estados Unidos.

Quedo atento a cualquier duda y/o consulta que requiera aclaración.

Saluda atentamente a usted,

JOSÉ IGNACIO GÓMEZ MEZA
JEFE (TYP) DIVISIÓN PROTECCIÓN PECUARIA

Incl.: Documento Digital: Courtesy translation - FSIS Official Letter
Documento Digital: COMENTARIOS SAG - INFORME AUDITORIA FSIS
Documento Digital: Courtesy Translation - SAG comments

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División Protección Pecuaria - Paseo Bulnes N° 140

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Santiago,

Mr. Shaukat H. Syed
Director
Internation Audit Staff
Office of Investigation, Enforcement, and Audit - FSIS

Dear Mr. Shaukat H. Syed

Along with my cordial greetings, I am writing you in order to send the comments and actions taken by the Agricultural and Livestock Service in front of the detected findings indicated in the draft final report of the audit conducted in Chile, between February 17th and March 7th of 2014 in which the Chilean food safety system governing the production of meat and poultry products intended for export to the United States of America was evaluated.

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

Best regards,

José Ignacio Gómez Meza
CVO Livestock Protection Division
Agricultural and Livestock Service

Comentarios del Servicio Agrícola y Ganadero (SAG) al informe de auditoría

I. COMPONENTE UNO: SUPERVISIÓN DEL GOBIERNO (ORGANIZACIÓN Y ADMINISTRACIÓN)

Alcance referente a velocidad de línea en planta faenadora de aves

En relación a la observación a la inspección post mortem en aves, en particular al número de pollos inspeccionados por inspector oficial, el SAG durante el mes de abril aumentará el número de inspectores oficiales en la zona de inspección post eviscerado, a objeto que cada inspector oficial inspeccione hasta un máximo de 35 aves por minuto, para dar cumplimiento con lo señalado en el 9CFR 381.76.

Esta medida se realizará en todas las faenadoras de aves habilitadas para exportar a Estados Unidos que no cumplían, en este aspecto, con lo exigido por la normativa de Estados Unidos.

II. COMPONENTE TRES: SANITIZACIÓN / VII. COMPONENTE CUATRO. ANÁLISIS DE PELIGRO Y PUNTOS CRÍTICOS DE CONTROL.

En relación a los hallazgos detectados in situ durante la auditoria a establecimientos exportadores

El Servicio Agrícola y Ganadero (SAG), en su rol de organismo oficial competente para declarar la aptitud para consumo humano de los productos agropecuarios primarios destinados a la exportación y considerando que la inocuidad en los procesos contempla las Buenas Prácticas de Manufactura (BPM), Procedimientos Operacionales Estandarizados (POE), Programas de Procedimientos Operacionales Estandarizados de Sanitización (POES) y el Sistema de Análisis de Peligros y Puntos de Control Crítico (HACCP), emitió con fecha 22 de febrero de 2013, la resolución exenta N° 1045, que establece exigencias específicas de los programas de prerrequisitos y HACCP para la implementación del sistema de aseguramiento de la calidad y deroga resolución N° 4.577.

Los puntos establecidos en dicha resolución, que incluyen desde su punto 12 a 21 todo lo relativo al deber de los establecimientos de desarrollar e implementar programas de prerrequisitos, de acuerdo a normativa nacional y requisitos de los países o mercados de destino de sus productos, e indican del punto 22 al 28, las directrices para la aplicación del sistema HACCP y re-evaluación plan HACCP y Prerrequisitos, son verificados por los equipos de inspección presentes en los establecimientos faenadores, y por médicos veterinarios oficial en establecimientos procesadores de exportación inscritos en el Listado de Establecimientos Exportadores de Productos Pecuarios (LEEPP) y habilitados para Estados Unidos, en razón de dar las garantías durante toda la cadena de procesos productivos.

En razón de lo anterior, y posterior a la auditoría realizada por el Food Safety and Inspection Service (FSIS), la División de Protección Pecuaria decidió fortalecer la ejecución a nivel regional, de las directrices emanadas desde el nivel central para la verificación del adecuado funcionamiento de los sistemas de aseguramiento de calidad en los establecimientos de exportación habilitados para Estados Unidos. Con esto, se llevo a cabo un ciclo de videoconferencias durante el mes de Septiembre de 2014, con participación de los encargados regionales pecuarios, supervisores regionales de inspección y certificación, jefes de equipos de inspección oficial e inspectores, donde se:

- Reforzó el marco normativo nacional y de Estados Unidos, dando énfasis a lo establecido en Title 9 – Code of Federal Regulations.

- Reiteró las actividades a realizar por los inspectores del Servicio en los establecimientos habilitados para exportar a Estados Unidos, poniendo especial hincapié en el hecho de que si se detecta contaminación o adulteración de productos, contaminación de superficies de contacto con el producto o condiciones no higiénicas para el procesamiento del producto que potencialmente pudieran conllevar un riesgo de inocuidad, se informe al responsable para que se tomen las acciones correctivas, donde se incluya la disposición adecuada de los productos, se restauren las condiciones sanitarias y procedimientos para prevenir la contaminación directa o adulteración de los productos, procediendo a restringir el uso de instalaciones, equipos o utensilios, según corresponda, hasta que haya ocurrido su corrección y el SAG haya autorizado su utilización.

- Fortaleció la fiscalización de los requerimientos del Decreto Supremo N° 94, sobre estructura y funcionamiento de mataderos, establecimientos frigoríficos, cámaras frigoríficas y plantas de desposte y fija equipamiento mínimo de tales establecimientos, dando un especial énfasis al artículo 4° de dicho documento, donde se establece que los recintos destinados a la faena de los animales y al procesamiento de los productos cárnicos deben cumplir, con techos, cielos y demás instalaciones suspendidas, diseñados y construidos en forma que impidan la acumulación de suciedad, reduzcan la condensación, con material higienizables y que impidan desprendimientos de partículas.

- Reforzó que la verificación SAG del monitoreo del o los puntos críticos de control (PCC) en terreno, debe constatar que los responsables definidos en el plan HACCP sean quienes realizan el monitoreo, si lo realizan con la frecuencia establecida, si registran los datos en el momento que se realiza el monitoreo que el registro tenga la fecha, hora e iniciales y firma de quien hizo el monitoreo en cada una de las entradas de datos y, además, el registro de acciones correctivas frente a una desviación.

- Reiteró que si las acciones implementadas por el establecimiento no dan garantías o éste persiste en un incumplimiento, se proceda a la suspensión de la certificación hasta que el establecimiento demuestre que ha vuelto a tomar control del proceso.

- Fortaleció el conocimiento del proceso de certificación a Estados Unidos, reiterando el adecuado uso de shipping marks.

Sumado a lo anterior, a partir del 2015 la División de Protección Pecuaria ha establecido los siguientes planes de acción en razón de fortalecer la comunicación del nivel central con las regiones, y velar por la adecuada ejecución de las directrices establecidas, por medio de:

- Capacitación de los equipos de inspección oficial presente en establecimientos habilitados para el mercado de Estados Unidos, por medio de visitas de profesionales del nivel central. Esta actividad se comenzó a partir del mes de enero, en la Región de Magallanes y Antártica Chilena, e incluyó visitas del punto de contacto y encargado del proceso de certificación al mercado de Estados Unidos y del encargado del rubro rumiantes. Durante estas visitas se fortaleció todos los puntos normativos específicos de la normativa estadounidense, proceso de certificación, inspección sanitaria, verificación de los sistemas de aseguramiento de calidad, con enfoque a los procesos de limpieza e higienización y HACCP.

- Visitas de auditoria por parte de profesionales del nivel central a establecimientos de exportación para verificar el cumplimiento de regulaciones nacionales y requisitos de los mercados de destino de los productos y evaluar el desempeño de la inspección oficial SAG en los establecimientos auditados. Este esquema comenzó en el mes de marzo del presente, en la Región de Magallanes y Antártica Chilena, donde fueron visitados todos los establecimientos habilitados para el mercado de Estados Unidos.

A continuación se presentan las acciones tomadas a los hallazgos durante la auditoría:

- **Establecimiento Soc. Com. José Marín Antonín y Cía. Ltda., LEEPP N° 12-05**

22/51: Requisitos de verificación del programa HACCP 9 CFR parte 417.5 y 417.8, Resolución Exenta N° 1045/2013: Establece exigencias específicas de los programas de pre-requisitos y HACCP para la implementación del Sistema de Aseguramiento de Calidad y deroga Resolución N° 4577/2012. Servicio Agrícola y Ganadero. Ministerio de Agricultura.

- Los registros de verificación del HACCP del establecimiento, no consideran el registro y los resultados de las actividades de verificación ejecutadas por el personal del establecimiento.

Acción Correctiva: Se realizó modificación del registro de verificación del HACCP, incluyéndose una casilla destinada a registrar la fecha, hora, nombre del responsable y resultado de la verificación. Dicha modificación fue verificada por personal del SAG.

- El plan HACCP del establecimiento no incluye observación directa del procedimiento de monitoreo como parte del desarrollo de actividades de verificación.

Acción Correctiva: Se solicitó la modificación del plan HACCP del establecimiento, donde se incluyo la verificación por observación directa del procedimiento de monitoreo, como parte de las actividades de verificación. Dicha modificación fue verificada por personal del SAG.

- **Establecimiento Faenadora San Vicente Ltda. LEEPP N ° 06-08**

22/51: Requisitos de verificación del programa HACCP 9 CFR parte 417.5 y 417.8, Resolución Exenta N° 1045/2013: Establece exigencias específicas de los programas de pre-requisitos y HACCP para la implementación del Sistema de Aseguramiento de Calidad y deroga Resolución N° 4577/2012. Servicio Agrícola y Ganadero. Ministerio de Agricultura.

- Los registros de verificación del HACCP del establecimiento no señalan la hora en la cual se realiza la verificación.

Acción Correctiva: La empresa corrige registro SV-RG-ACL-267, incluyendo nombre de verificador y hora de verificación. Dicha modificación fue verificada por personal del SAG.

39/51: Otros requisitos 9CFR 416.4 y 416.1, Decreto Supremo N° 94/2008: Reglamento sobre estructura y funcionamiento de mataderos, establecimientos frigoríficos, cámaras frigoríficas y plantas de desposte y fija equipamiento mínimo de tales establecimientos. Ministerio de Agricultura.

- Se observaron numerosos espacios entre el techo y las estructuras de soporte de las instalaciones, estos espacios se encontraban sobre el producto y las superficies de contacto en la sala de desposte. Esto puede generar que potencialmente pueden afectar la inocuidad del producto.

Acción Correctiva: El SAG solicitó al establecimiento que presente un "procedimiento de corrección inmediata a deficiencias infraestructurales que se generen por trabajos normales en la planta".

El establecimiento presento el documento "Instrucción de trabajo del sistema integrado de gestión: corrección deficiencias en infraestructura" (FG-PR-MAN-001) el cual fue verificado por el SAG.

55/51: Post-mortem Inspection: [9 CFR 381.76]: line speed was at a rate of 45 birds per minute per inspector on the day of the audit. This is a faster line speed tan is prescribed in the FSIS regulations.

Acción Correctiva: El SAG durante el mes de abril aumentará el número de inspectores oficiales en la zona de inspección post eviscerado, a objeto que cada inspector oficial inspeccione hasta un máximo de 35 aves por minuto, para dar cumplimiento con lo señalado en el 9CFR 381.76.

- **Establecimiento Procesadora de Alimentos del Sur Limitada (ex Faenadora Rosario), LEEPP N° 06-06.**

22/51: Requisitos de verificación del programa HACCP 9 CFR parte 417.5 y 417.8, Resolución Exenta N° 1045/2013: Establece exigencias específicas de los programas de pre-requisitos y HACCP para la implementación del Sistema de Aseguramiento de Calidad y deroga Resolución N° 4577/2012. Servicio Agrícola y Ganadero. Ministerio de Agricultura.

- Los registros de verificación del HACCP del establecimiento, en este caso los registros de calibración de los equipos de monitoreo, no consignan la hora de verificación, así tampoco el nombre del empleado de la empresa designado para dicha actividad.

Acción Correctiva: La empresa corrige registro de verificación de termómetros, incorporando la hora de verificación y nombre de supervisor que verifica. Dicha modificación fue verificada por personal del SAG.

39/51: Otros requisitos 9CFR 416.4 y 416.1, Decreto Supremo N° 94/2008: Reglamento sobre estructura y funcionamiento de mataderos, establecimientos frigoríficos, cámaras frigoríficas y plantas de desposte y fija equipamiento mínimo de tales establecimientos. Ministerio de Agricultura.

- Se observaron numerosos espacios entre el techo y las estructuras de soporte de las instalaciones, estos espacios se encontraban sobre el producto y las superficies de contacto en la sala de desposte. Esto puede generar condiciones insalubres y una potencial contaminación del producto.

Acción Correctiva: El establecimiento corrigió las deficiencias estructurales y realizó una modificación en su plan de calidad, donde se incorporó la revisión de estructuras de salas de proceso en una rutina mensual realizada por supervisores de calidad. Además se crea registro RO-RG_ACL-243. Lo anterior, fue verificado por personal del SAG.

III. COMPONENTE SEIS: PROGRAMAS DE PRUEBAS MICROBIOLÓGICAS DEL GOBIERNO

Listeria monocytogenes en productos listos para el consumo (RTE)

Chile actualmente cuenta con una equivalencia con el Food Safety and Inspection Service (FSIS) para el control microbiológico oficial, que consta de tres componentes: el Programa de Reducción de Patógenos, la verificación oficial de *E. coli* O157:H7 y STEC, y la verificación oficial de listos para consumo (RTE) con destino a Estados Unidos.

Para esto, el Laboratorio Pecuario Central, mantienen implementadas las siguientes técnicas analíticas para productos listos para consumo:

- *Listeria monocytogenes*: screening VIDAS LMO2 AFNOR BIO 12/11-03/04 y confirmación ISO 11290-1.
- *Salmonella*: screening VIDAS Easy SLM AFNOR BIO 12/16-09/05 y confirmación ISO 6579.
- *E. coli* O157:H7: screening VIDAS UP O157:H7 AFNOR BIO 12/25-05/09 o VIDAS ECO AFNOR 12/8-07/00 y confirmación: a) Inmunoconcentración MLG 5.08 29/06/2014 o VIDAS ICE AFNOR BIO 12/8-07/00 b) Agar Fluorocult o Agar Chrom ID c) Bioquímica MLG 5.08 29/06/2014 o Identificación API d) Serología Aglutinación RIM REMEL 12076 e) Factores eae, stx1 y/o stx2 MLG 5.08 29/2014.

En razón de lo anterior, y frente a la solicitud del Food Safety and Inspection Service (FSIS) de implementación efectiva de un criterio de equivalencia para el programa de control para *Listeria monocytogenes* en productos RTE, me permito indicar que:

- La División de Protección Pecuaria durante el mes de octubre de 2014, solicitó al laboratorio Pecuario Central la compra de insumos para la realización de los análisis de *Listeria monocytogenes* (Lm) en superficies de contacto directo y ambiente. También se gestionó la compra de materiales de muestreo, y se realizó la posterior distribución de los mismos, a los médicos veterinarios oficiales encargados de los establecimientos habilitados para el mercado de Estados Unidos.

- La División de Protección Pecuaria emitió Circular N° 174 con fecha 5 de marzo de 2015, donde reiteró que para poder certificar de productos listo para el consumo (RTE) al mercado de Estados Unidos, la verificación por parte del médico veterinario inspector oficial, debe dar cuenta que el establecimiento ha incorporado en su monitoreo de autocontrol los análisis de *Listeria monocytogenes* en producto terminado, superficies de contacto directo con producto y ambiente, según la correspondiente categoría de riesgo.

- La División de Protección Pecuaria realizó visitas a los establecimientos elaboradores de productos RTE habilitados para el mercado de Estados Unidos durante el mes de abril de 2015, para verificar la implementación de los análisis de autocontrol y la incorporación de los requisitos establecidos por el FSIS en el plan HACCP de las empresas.

- Durante el mes de mayo, se concluirá la nueva versión del instructivo de verificación oficial de productos RTE con destino a Estados Unidos y se iniciará la toma de muestras de superficie de contacto y ambiente para los análisis oficiales en los establecimientos bajo este alcance, los que se sumarán a los análisis oficiales mensuales en producto terminado que se realizan a la fecha.

Por último, me permito informar que desde la fecha de realización de la auditoría por parte de FSIS entre el 17 de febrero y el 7 de marzo de 2014 y hasta la fecha de emisión de este informe, no se ha certificado ninguna partida de productos RTE a Estados Unidos. No procederá a certificar productos RTE a Estados Unidos, desde los establecimientos habilitados, hasta que personal del Servicio Agrícola y Ganadero, haya verificado la implementación de los análisis antes mencionados.

ALCANCES AL INFORME DE AUDITORÍA

A continuación, la División de Protección Pecuaria se permite presentar algunos alcances referentes a lo indicado en el informe de auditoría, que permitan complementar algunas temáticas abordadas y/o clarificar algunas situaciones. Estas han sido destacadas en negro y se presentan a continuación:

Página	Contenido del borrador final de auditoría	Comentarios del Servicio Agrícola y Ganadero
I. INTRODUCCIÓN		

1	Actualmente, Chile tiene determinaciones de equivalencia en vigor para los siguientes puntos:
	
	• Para *Escherichia coli (E. coli)* genérica: Cuatro sitios de muestreo para vacunos y porcinos.
	• Para *Salmonella*:
	  ○ Pruebas continuas, año calendario
	  ○ Acciones correctivas inmediatas requeridas por los establecimientos que presenten **resultados positivos**, seguidos por muestreo adicional a cargo del Servicio Agrícola y Ganadero (SAG) para verificar la efectividad de las acciones correctivas del establecimiento
	  ○ Cuatro sitios de muestreo para vacunos y porcinos
	  ▪ Se muestrean 400 cm^2, 100 cm^2 por cada sitio de muestreo
	  ○ **Análisis de muestras por laboratorios privados**
		Favor considerar lo siguiente a modo de aclaración:
		
		- En el caso de *Salmonella*, las acciones correctivas inmediatas son requeridas cuando los establecimientos presentan fallos.
		
		- En relación a los análisis de muestras por laboratorios privados, es importante destacar que estos son autorizados por el Servicio Agrícola y Ganadero.

Página	**Contenido del borrador final de auditoría**	**Comentarios del Servicio Agrícola y Ganadero**
I. INTRODUCCIÓN		

2	• Para *Listeria monocytogenes (Lm)*:
	  ○ El programa de control de *Lm*
	  ○ Método analítico para RTE en carne y aves de corral VIDAS *Lm* Xpress (09/03/11)
	  ○ Método de detección y confirmación VIDAS LMO2 (06/07/09)
		Favor considerar lo siguiente a modo de aclaración:
		
		- Actualizar metodologías vigentes, para RTE, *Salmonella, E. coli* O157:H7 (sólo en productos bovino) y *Listeria monocytogenes (Lm)*, las cuales cuentan con equivalencia:
		
		  ○ Lm: screening VIDAS LMO2 AFNOR BIO 12/11-03/04 y confirmación ISO 11290-1.
		  ○ *Salmonella:* screening VIDAS Easy SLM AFNOR BIO 12/16-09/05 y confirmación ISO 6579.

	• Para *E. coli* O157:H7: ○ El Programa Nacional para *E. coli* O157:H7 ▪ Método analítico VIDAS ECO (08/07/09) ▪ Método confirmatorio VIDAS ICE (08/07/09) ▪ Método analítico en carne RTE VIDAS ECPT (09/03/11)	○ *E. coli* O157:H7: screening VIDAS UP O157:H7 AFNOR BIO 12/25-05/09 o VIDAS ECO AFNOR 12/8-07/00 y confirmación: a) Inmunoconcentración MLG 5.08 29/06/2014 o VIDAS ICE AFNOR BIO 12/8-07/00 b) Agar Fluorocult o Agar Chrom ID c) Bioquímica MLG 5.08 29/06/2014 o Identificación API d) Serología Aglutinación RIM REMEL 12076 e) Factores eae, stx1 y/o stx2 MLG 5.08 29/2014. • Para *E. coli* O157:H7: ○ El Programa Nacional para *E. coli* O157:H7 ▪ E. coli O157:H7: screening VIDAS UP O157:H7 AFNOR BIO 12/25-05/09 o VIDAS ECO AFNOR 12/8-07/00 y confirmación: a) Inmunoconcentración MLG 5.08 29/06/2014 o VIDAS ICE AFNOR BIO 12/8-07/00 b) Agar Fluorocult o Agar Chrom ID c) Bioquímica MLG 5.08 29/06/2014 o Identificación API d) Serología Aglutinación RIM REMEL 12076 e) Factores eae, stx1 y/o stx2 MLG 5.08 29/2014.
Página	**Contenido del borrador final de auditoría**	**Comentarios del Servicio Agrícola y Ganadero**
IV. COMPONENTE UNO: Supervisión del Gobierno (organización y administración)		
4	Las responsabilidades de inspección de la CCA son administradas desde 15 Oficinas Regionales (RO). Cada RO tiene uno o dos Supervisores Regionales (RS), quienes llevan a cabo revisiones de supervisión periódicas. **Hay 64 oficinales locales bajo estas 15 ROs. En cada oficina local, un funcionario veterinario oficial sirve como un supervisor de campo sobre los veterinarios oficiales asignados en los establecimientos.**	**Favor considerar lo siguiente a modo de aclaración:** - Existen 65 oficinas locales bajo la jurisdicción de las direcciones regionales. - Es responsabilidad de los Supervisores Regionales verificar el adecuado accionar de los veterinarios oficiales asignados a los establecimientos. Muchas veces estos supervisores, se encuentran físicamente ubicados en oficinas sectoriales.
Página	**Contenido del borrador final de auditoría**	**Comentarios del Servicio Agrícola y Ganadero**
4	**La CCA ha establecido un mínimo de, al menos, una revisión de supervisión de al menos cada cuatro meses para establecimientos faenadores exportadores y al menos una vez cada seis meses para establecimientos procesadores exportadores.** Las tres regiones auditadas cumplen con la frecuencia establecida por la CCA.	**Favor considerar lo siguiente a modo de aclaración:** - En el modelo actual la supervisión está dirigida los equipos de inspección y MVO, de los establecimientos faenadores y procesadores de exportación, respectivamente.

Página	Contenido del borrador final de auditoría	Comentarios del Servicio Agrícola y Ganadero
V. COMPONENTE DOS: Autoridad oficial y regulaciones sobre seguridad alimentaria. (Actividades de inspección del sistema y estándar de productos).		
6	Durante la supervisión del nivel central, el auditor FSIS verificó las regulaciones emitidas por este nivel, el diseño de la legislación oficial, regulaciones, y otras instrucciones emitidas en relación con: • Norma técnica N ° 62 NORMA GENERAL TECNICA SOBRE INSPECCION MÉDICO VETERINARIA DE LAS RESES DE ABASTO Y DE SUS CARNES Y CRITERIOS PARA LA CALIFICACIÓN DE APTITUD PARA EL CONSUMO HUMANO. • Ley 20380. SOBRE PROTECCIÓN DE ANIMALES. • Fax 523-09. BIENESTAR ANIMAL EN ESTABLECIMIENTOS RUBRO OVINO, BOVINO Y CERDOS. • **Norma técnica Nº 117. NORMA TÉCNICA DE INSPECCIÓN VETERINARIA EN AVES DE CORRAL Y SUS CARNES.**	**Favor considerar lo siguiente a modo de aclaración:** - La norma técnica de inspección veterinaria en aves de corral y sus carnes, corresponde a un estándar técnico y no a una ley. Es equivalente a la norma técnica n° 62.
7	Las siguientes leyes, regulaciones y resoluciones son las que dispone la CCA para la creación de planes de supervisión de los establecimientos que desean exportar carne y productos avícolas a los Estados Unidos:	**Favor considerar lo siguiente a modo de complementar el informe:** - En este punto creemos adecuado la incorporación de dos marcos reglamentarios que son utilizados por el SAG: • Decreto Supremo 94. APRUEBA REGLAMENTO SOBRE ESTRUCTURA Y FUNCIONAMIENTO DE MATADEROS, CÁMARAS FRIGORÍFICAS Y PLANTAS DE DESPOSTE Y FIJA EQUIPAMIENTO MÍNIMO DE TALES ESTABLECIMIENTOS. • Resolución 1045. ESTABLECE EXIGENCIAS ESPECÍFICAS DE LOS PROGRAMAS DE PRERREQUISITOS Y HACCP PARA LA IMPLEMENTACIÓN DEL SISTEMA DE ASEGURAMIENTO DE LA CALIDAD Y DEROGA RESOLUCIÓN Nº 4.577, DE 2012.
Página	**Contenido del borrador final de auditoría**	**Comentarios del Servicio Agrícola y Ganadero**
VI. COMPONENTE TRES: Sanitización.		
7	La evaluación del componente de sanitización incluyó un análisis de la información entregada por la CCA a través del SRT, entrevistas, y	**Favor considerar lo siguiente a modo de complementar el informe:**

	observaciones derivadas de la auditoria en terreno. Los requerimientos de sanitización de la CCA se encuentran respaldados por los siguientes documentos:	- En este punto creemos adecuado la incorporación de dos marcos reglamentarios que son utilizados por el SAG: • Decreto Supremo 94. APRUEBA REGLAMENTO SOBRE ESTRUCTURA Y FUNCIONAMIENTO DE MATADEROS, CÁMARAS FRIGORÍFICAS Y PLANTAS DE DESPOSTE Y FIJA EQUIPAMIENTO MÍNIMO DE TALES ESTABLECIMIENTOS. • Resolución 1045. ESTABLECE EXIGENCIAS ESPECÍFICAS DE LOS PROGRAMAS DE PRERREQUISITOS Y HACCP PARA LA IMPLEMENTACIÓN DEL SISTEMA DE ASEGURAMIENTO DE LA CALIDAD Y DEROGA RESOLUCIÓN Nº 4.577, DE 2012.
Página	**Contenido del borrador final de auditoría**	**Comentarios del Servicio Agrícola y Ganadero**
VII. COMPONENTE CUATRO: Análisis de Peligro y Puntos Críticos de Control.		
9	El plan HACCP requerido por la CCA se encuentra respaldado por los siguientes documentos: • Decreto Supremo 94. APRUEBA REGLAMENTO SOBRE ESTRUCTURA Y FUNCIONAMIENTO DE MATADEROS, CÁMARAS FRIGORÍFICAS Y PLANTAS DE DESPOSTE Y FIJA EQUIPAMIENTO MÍNIMO DE TALES ESTABLECIMIENTOS. • Fax 5338. • Fax 1363. • **Proyecto N° 322. MANUAL GENÉRICO DE SISTEMA DE ASEGURAMIENTO DE LA CALIDAD.**	**Favor considerar lo siguiente a modo de complementar el informe:** - En este punto creemos adecuado la incorporación de dos marcos reglamentarios que son utilizados por el SAG: • Resolución 1045. ESTABLECE EXIGENCIAS ESPECÍFICAS DE LOS PROGRAMAS DE PRERREQUISITOS Y HACCP PARA LA IMPLEMENTACIÓN DEL SISTEMA DE ASEGURAMIENTO DE LA CALIDAD Y DEROGA RESOLUCIÓN Nº 4.577, DE 2012. • Resolución 2592. ESTABLECE REQUISITOS PARA LA INSPECCION Y CERTIFICACION SANITARIA DE EXPORTACION DE PRODUCTOS Y SUBPRODUCTOS COMESTIBLES DE ORIGEN ANIMAL **Aclaración:** Proyecto N° 322. MANUAL GENÉRICO DE SISTEMA DE ASEGURAMIENTO DE LA CALIDAD, fue derogado previo a la visita de auditoría.
Página	**Contenido del borrador final de auditoría**	**Comentarios del Servicio Agrícola y Ganadero**
VIII. COMPONENTE CINCO: Programa Gubernamental de Control de Residuos Químicos		
10	El auditor determinó que la implementación del plan en el nivel central, laboratorio, regional, y en planta se desarrolla de la manera descrita en el plan, y el muestreo se efectúa en los tiempos y en la manera diseñada. Los análisis se realizan en los tiempos previstos, y los resultados son distribuidos como se indica. **Las medidas de ejecución son delegadas a otra agencia, Sanidad Animal.**	**Favor considerar lo siguiente como complemento al informe:** Las medidas de ejecución frente a un resultado positivo son realizadas por Médicos veterinarios Oficiales tanto de los establecimientos, como de las oficinas sectoriales. Si el hallazgo corresponde a una sustancia prohibida, complementariamente, se deriva la investigación a la Unidad de Registro y Control de Medicamentos

		Veterinarios, perteneciente al Subdepartamento de Sanidad Animal de la División de Protección Pecuaria del SAG.
10	Todos los resultados fuera de límite son informados de manera inmediata, **y personal de la agencia de Sanidad Animal retiene el producto**, destruye el producto, activando recall, ordena cuarentena de granjas, y un plan de comunicación del riesgo en relación a la substancia detectada es activado.	**Favor considerar lo siguiente a modo de aclaración:** Todos los resultados fuera de límite, son informados por el laboratorio de análisis a la Unidad de Control de Residuos, quien instruye las medidas a tomar: retención, suspensión de certificación, recall y otras acciones en conjunto con el Ministerio de Salud, tales como cuarentena de granja y destrucción de productos. Además, se activa la comunicación del riesgo en relación a la sustancia detectada.

Página	Contenido del borrador final de auditoría	Comentarios del Servicio Agrícola y Ganadero
IX. COMPONENTE SEIS: PROGRAMAS DE PRUEBAS MICROBIOLÓGICAS DEL GOBIERNO		
12	**Pruebas para *E. coli* genérica** La CCA ha adoptado los requisitos reglamentarios del FSIS para pruebas de *E. coli* genérica, con la excepción de elegir cuatro sitios de muestreo en una canal, lo cual fue determinado como equivalente por el FSIS en 2005. El auditor del FSIS acompañó y observó las actividades de verificación de inspección en planta para la recolección de muestras de *Salmonella* y *E. coli* genérica. El muestreo y las pruebas para la E. coli genérica fue llevado a cabo de acuerdo con el Procedimiento de Muestreo Microbiológico en establecimientos faenadores exportadores **P-PP-IT-I** en los cuatro establecimientos auditados.	**Favor considerar lo siguiente a modo de aclaración:** La codificación del Documento General para el Muestreo Microbiológico de Canales de Carne en Establecimientos Faenadores Exportadores es D-CER-VPE-PP-003 Versión 01.
Página	**Contenido del borrador final de auditoría**	**Comentarios del Servicio Agrícola y Ganadero**
IX. COMPONENTE SEIS: PROGRAMAS DE PRUEBAS MICROBIOLÓGICAS DEL GOBIERNO		
13	**Programa de prueba para *E. coli* O157:H7 y *E. coli* distintas a O157 productora de toxina Shiga en productos de carne cruda** El programa de prueba para *E. coli* O157:H7 en carne cruda ha sido determinado previamente como equivalente por el FSIS. La CCA muestrea trimmings de carne cruda y cortes designados para molido en base a frecuencias y métodos establecidos de muestreo. El auditor del FSIS	Favor considerar lo siguiente a modo de aclaración: Las muestras oficiales son analizadas en el laboratorio del gobierno por un método analítico: o E. coli O157:H7: screening VIDAS UP O157:H7 AFNOR BIO 12/25-05/09 o VIDAS ECO AFNOR 12/8-07/00 y confirmación: a) Inmunoconcentración MLG 5.08 29/06/2014 o

	verificó a través de la revisión de documentos que el personal de inspección recolecta una muestra al mes en un establecimiento de faena y procesado de bovinos auditado que exporte trimmings de carne a los Estados Unidos. El personal de inspección en planta ha recibido capacitación en la recolección de muestras descrito en el Instructivo Oficial de *E. coli* O157:H7. **Las muestras oficiales son analizadas en el laboratorio del gobierno por un método analítico (VIDAS UP AFNOR N° BIO 12/25-05/09). El auditor del FSIS verificó que lotes con resultados positivos de *E. coli* O157:H7 están segregados e identificados como "Rechazados para exportar a Estados Unidos". Durante el curso de la auditoría in situ y el 28 de Febrero del 2014, la CCA presentó su programa de prueba de *E. coli distintas a*O157 productora de toxina Shiga al FSIS. El FSIS determinó que la información mostrada que la CCA cumple con el criterio de equivalencia para medidas de control sobre la *E. coli* que no sea O157 productora de toxina Shiga.**	VIDAS ICE AFNOR BIO 12/8-07/00 b) Agar Fluorocult o Agar Chrom ID c) Bioquímica MLG 5.08 29/06/2014 o Identificación API d) Serología Aglutinación RIM REMEL 12076 e) Factores eae, stx1 y/o stx2 MLG 5.08 29/2014. o STEC no-O157: screening GDS MPX TOP 7 STEC AOAC 071301 Biocontrol y confirmación: a) Inmunosepáración magnética MLG 5B.05 29/06/2014 Poly IMS, IMS Panel, VIDAS UP ESPT b) Siembra agar 5B.05 o Chrom ID EHEC c) Bioquímica MLG 5B.05 29/06/2014 o Sistema API El auditor del FSIS verificó que lotes con resultados positivos de *E. coli* O157:H7 están segregados e identificados como "Rechazados para exportar a Estados Unidos". Durante el curso de la auditoría in situ y el 18 de Febrero del 2014, la CCA presentó la Carta N° 491 del 29 de enero de 2014 con las metodologías de *E. coli distintas a* O157 productora de toxina Shiga al FSIS. El FSIS determinó que la información mostrada que la CCA cumple con el criterio de equivalencia para medidas de control sobre la *E. coli* que no sea O157 productora de toxina Shiga.

El Servicio Agrícola y Ganadero reafirma, por este medio, su compromiso con el Food Safety and Inspection Service (FSIS) de mantener las garantías que dieron origen a la equivalencia entre ambos sistemas.

Comments of the Agricultural and Livestock Service (SAG) to the FSIS audit report

I. COMPONENT ONE: GOVERNMENT SUPERVISION (ORGANIZATION & ADMINISTRATION)

In reference to the line speed at a poultry slaughterhouse establishment

In regards to the observation of poultry postmortem inspection, particularly to the number of chickens inspected by the Official Inspector, SAG will, during the month of April, increase the number of Official Inspectors in the inspection area post evisceration, in order to have each inspector inspect 35 birds or less per minute to fulfill the established in 9CFR 381.76.

This measure will be carried out in all poultry slaughterhouses authorized for exportation to the United States of America (US) that did not fulfill, in this aspect, that which was ruled by the US regulation.

II. COMPONENT THREE: SANITATION / COMPONENT FOUR: HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEMS.

In regards to the findings detected on site during the audit of the exportation establishments.

The Agricultural and Livestock Service (SAG), in its role of competent official organism to declare the aptitude for human consumption of the primary livestock products destined for exportation and considering that the food safety of the products contemplates the Good Manufacturing Practices (GMP), Standard Operational Procedures (SOP), Sanitation Standard Operational Procedure (SSOP) and the Hazard Analysis and Critical Control Points (HAACP) issued on February 22nd of 2013, extent resolution Nº 1045, that establishes specific requirements of the prerequisite programs and HAACP for the implementation of the system of quality insurance and repeals resolution Nº 4.577.

The points established in said resolution, that include from point 12 to 21 everything relative to the duty of the establishments to develop and implement prerequisite programs, according to the national regulations and the requisites of the countries or markets of destination of their products, and indicate in points 22 to 28, the guidelines for the application of the HACCP system and reevaluation of the HACCP plan and Prerequisites are verified by the inspection teams present in the slaughtering establishments and official veterinarians in exportations processers establishments registered in the List of Establishments for the Exportation of Livestock Products

(LEEPP) and authorized for the United States of America, in order to guarantee the entire chain of the productive processes.

In light of the above, and after the audit conducted by the Food Safety and Inspection Service (FSIS), the Livestock Protection Division decided to strengthen the execution, on a regional level, of the guidelines that come from the central level for the verification of the correct functioning of the quality insurance systems of the establishments that are authorized for exportation to the United States of America. With this, a cycle of video conferences have been carried out during the month of September of 2014, with the participation of regional livestock managers, regional supervisors of inspection and certification, team leaders of Official Inspection as well as Official Inspectors, in which instances the following was accomplished:

- Reinforcing of the national regulation framework, as well as that of the United States, emphasizing that which was established in the Title 9 – Code of Federal Regulations.

- The activities that should be carried out by the inspectors of the Service in the establishments that have been authorized for exportation to the Unites States have been reiterated, especially stressing the fact that if a contamination or alteration has been detected in the product or unhygienic conditions have been found in the processing of the product that could potentially lead to a food safety risk, the person responsible will be informed in order to take the necessary corrective actions, in which the appropriate disposition of the products will be included, the sanitary conditions will be restored and procedures to prevent the direct contamination or alteration of the products, proceeding to restrict the use of the facilities , equipment or utensils, as appropriate, until correction has occurred and the SAG has authorized its use.

- Strengthen the oversight of the requirements established by the Supreme Decree No. 94 on structure and operation of slaughterhouses, cold storages, refrigerating chambers and deboning plants and sets minimum equipment of such premises, giving special emphasis to Article 4 of that document, which states that the enclosures for the slaughter of animals and processing of meat products must comply with roofs, ceilings and suspended structures designed and constructed as to prevent the accumulation of dirt, reduce condensation, with material that allows an adequate sanitation and prevents detachment of particles.

- SAG verification activities of the critical control points monitoring on-site was reinforced, indicating that this verification must also check that those responsible defined in the HACCP plan are those doing the monitoring, if it is done with the set frequency, if during monitoring the data is recorded indicating the date, time and initials and signature of who made the monitoring in each of the data entries and also, recording of the actions taken to correct a deviation.

- The suspension of the certification must be applied in the case that the actions implemented by the establishment actions does not provide certainty of compliance or persist in a non-compliance was reiterated. This condition must be maintained until the establishment demonstrates that it has retaken control of the process.

- Strengthen the knowledge for the certification process to the United States, reiterating the proper use of shipping marks.

Besides the aforementioned, starting from 2015, the Livestock Protection Division has established the following action plans in order to strengthen the communication between the headquarters (central level) and the regional levels, and ensure the proper implementation of the established guidelines, through:

- Training of the official inspection teams in establishments authorized for the US market, through visits of professionals of the headquarters (central level). This activity started from the month of January, in the Region of Magallanes and Antártica Chilena, and included visits of the contact point and responsible for the certification process to the market of United States and the professional in charge of sanitary inspection of ruminants. During these visits, the following points were strengthen: all specific regulatory points of US regulations, certification process, sanitary inspection, verification of quality assurance systems, with a focus on the processes of cleaning, sanitation and HACCP.

- Audit visits by professionals from the headquarters (central level) to exportations establishments to verify compliance with national regulations and requirements of the third countries, to which these products are destined, and evaluate the performance of the official inspection in the audited establishments. This scheme began in March of the current year, in the Region of Magallanes and Antártica Chilena, where all establishments authorized to export to the US were visited.

The corrective actions taken actions taken in front of the detected findings in the on-site audit are presented:

- **Establishment Soc. Com. José Marín Antonín y Cía. Ltda., LEEPP N° 12-05**

22/51: HACCP ongoing requirements based on [9 CFR part 417.5 and 417.8] and on [Chile's Resolución Exenta N° 1045/2013: Establece exigencias específicas de los programas de prerequisitos y HACCP para la implementación del Sistema de Aseguramiento de Calidad y deroga Resolución N° 4577/2012. Servicio Agrícola y Ganadero. Ministerio de Agricultura (HACCP requirements)].

- The establishment's HACCP verification records for review of records component did not document the time or the results of the ongoing verification activities conducted by the establishment's personnel.

Corrective Action: A modification of the registry for verification of HACCP was performed, including a box destined to record date, time, name of responsible and verification result. This modification was verified by SAG personnel.

- The establishment's HACCP plan did not include direct observation of monitoring procedures as part of its on-going verification activities.

Corrective Action: Modification of the establishment's HACCP plan was requested, in which was included by direct observation, the verification of the monitoring procedure, as part of the verification activities. This modification was verified by SAG personnel.

- **Establishment Faenadora San Vicente Ltda. LEEPP N ° 06-08**

22/51: HACCP ongoing requirements based on [9 CFR part 417.5 and 417.8] and on [Chile's Resolución Exenta N° 1045/2013: Establece exigencias específicas de los programas de prerequisitos y HACCP para la implementación del Sistema de Aseguramiento de Calidad y deroga Resolución N° 4577/2012. Servicio Agrícola y Ganadero. Ministerio de Agricultura (HACCP requirements)].

- The establishment's HACCP verification records did not document the time of verification activities

Corrective Action: The establishment corrects registry SV -RG -ACL -267, including name of the person in charge of the verification and time of verification. This modification was verified by SAG personnel.

39/51: Other requirements [9 CFR part 416.4 and 416.17] and [Chile's Decreto N° 94/2008: Reglamento sobre estructura y funcionamiento de mataderos, establecimientos frigoríficos, cámaras frigoríficas y plantas de desposte y fija equipamiento mínimo de tales establecimientos. Ministerio de Agricultura (facility structure).

- Numerous gaps between the ceiling and protruding metal bars holding attached structures observed in the ceiling above exposed products and food contacts surfaces in the cutting room. This may create insanitary conditions and a potential for product contamination.

Corrective Action: SAG requested to the establishment the submission of an "immediate correction procedure for the infrastructural deficiencies that are generated by normal operations in the establishment".

The establishment presented the document "Work instruction integrated management system: Correction of infrastructure deficiencies" (FG- PR- MAN- 001) which was verified by the SAG.

55/51: Post-mortem Inspection: [9 CFR 381.76]: line speed was at a rate of 45 birds per minute per inspector on the day of the audit. This is a faster line speed tan is prescribed in the FSIS regulations.

Corrective Action: SAG will, during the month of April, increase the number of Official Inspectors in the inspection area post evisceration, in order to have each inspector inspect 35 birds or less per minute to fulfill the established in 9CFR 381.76.

- **Establishment Procesadora de Alimentos del Sur Limitada (ex Faenadora Rosario), LEEPP N° 06-06.**

22/51: HACCP ongoing requirements based on [9 CFR part 417.5 and 417.8] and on [Chile's Resolución Exenta N° 1045/2013: Establece exigencias específicas de los programas de prerequisitos y HACCP para la implementación del Sistema de Aseguramiento de Calidad y deroga Resolución N° 4577/2012. Servicio Agrícola y Ganadero. Ministerio de Agricultura (HACCP requirements)].

- The establishment's HACCP verification records for calibration of monitoring equipment did not document time or initial of the responsible establishment employee.

Corrective Action: The establishments corrects registry for the verification of thermometers, incorporating the time of verification and name of the verifying supervisor. This modification was verified by SAG personnel.

39/51: Other requirements [9 CFR part 416.4 and 416.17] and [Chile's Decreto N° 94/2008: Reglamento sobre estructura y funcionamiento de mataderos, establecimientos frigoríficos, cámaras frigoríficas y plantas de desposte y fija equipamiento mínimo de tales establecimientos. Ministerio de Agricultura (facility structure)].

- Numerous gaps between the ceiling and protruding metal bars holding attached structures observed in the ceiling above exposed products and food contacts surfaces in the cutting room. This may create insanitary conditions and a potential for product contamination.

Corrective Action: The establishment corrected the structural deficiencies and made a modification in their quality plan, in which the review process of structures in processing rooms was incorporated into a monthly routine by the quality supervisors. Registry RO- RG_ACL -243 is created. This was verified by SAG personnel.

III.- COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS.

Listeria monocytogenes in "Ready to eat" (RTE) products.

Currently the SAG´s microbiological programs have equivalence recognition by the Food Safety and Inspection Service (FSIS). This recognition has three components: Pathogen reduction program, E. coli O157:H7 official verification, and the official verification for ready to eat (RTE) products that will be exported to the EE.UU.

In order to apply this official recognized verifications, the central laboratory have implemented the following analytical technics for the RTE products:

- Listeria monocytogenes: Screening VIDAS LMO2 AFNOR BIO 12/11-03/04 and ISO 11290-1 confirmation.
- Salmonella: Screening VIDAS Easy SLM AFNOR BIO 12/16-09/05, and ISO 6579 confirmation.
- E. coli O157:H7: Screening VIDAS UP O157:H7 AFNOR BIO 12/25-05/09 or VIDAS ECO AFNOR 12/8-07/00 and confirmation by:

  a) Inmunoconcentration MLG 5.08 29/06/2014 or VIDAS ICE AFNOR BIO 12/8-07/00.
  b) Agar Fluorocult or Agar Chrome ID.
  c) Biochemical MLG 5.08 29/06/2014 or Identification API
  d) Aglutination Serology RIM REMEL 12076
  e) EAE Factors, stx1 y/o stx2 MLG 5.08 29/2014.

According to the above, and considering the request of the Food Safety and Inspection Service (FSIS) of effective implementation of the criteria of equivalency for the control program of Listeria monocytogenes in RTE products, I will allow myself to indicate the following:

- During the month of October 2014, the Livestock Protection Division asked the Central Laboratory of Livestock to purchase of the necessary supplies to carry out the Listeria monocytogenes sampling plan on contact surfaces and environment. In addition, sampling materials were purchased and later distributed to the Veterinarian in charge of the establishments authorized for the United States market.

- The Livestock Protection Division issued Circular Nº 174 dated in March 5, 2015, in which it is reminded that in order to certify products ready for consumption (RTE) to the United States market, the verification by the Official Inspector must account that the establishment has incorporated in its selfcontrol monitoring the analysis of Listeria monocytogenes in the finished product, the surfaces in direct contact with the product and the environment, according to the corresponding risk category.

- In order to determinate the self-control programs implementation and the actualization of HACCP program, during the month of April 2015, the Livestock Protection Division carried out visits to the establishments that elaborate the RTE products authorized for the United States market.

- During the month of May, 2015, the new version of the official verification procedure for the RTE products with destination to the United States will be concluded and the official Listeria monocytogenes sampling plan in surfaces and environment will begin for the official analysis of the establishments under this reach, those will be added to the monthly official analysis of the finished product that are conducted to date.

Finally, I inform you that since the date of the audit conducted by FSIS in Chile, between February 17th and March 7th of 2014, and up until the date of emission of this report, we have not certified any shipment of RTE products to the United States. RTE products will not be certified to the United States of America, from the authorized establishments, until the Agricultural and Livestock Service personnel have verified the implementation of the analysis aforementioned.

SAG CLARIFICATIONS TO THE FSIS AUDIT REPORT

The Livestock Protection Division has allowed itself the presentation of some proposed corrections regarding that, which was indicated in the report of the audit, that may complement some matters that were handled, as well as clarify some situations. These have been marked in bold and are presented below:

Page	DRAFT FSIS AUDIT REPORT	AGRICULTURAL AND LIVESTOCK SERVICE COMMENTS
I.	**INTRODUCTION.**	
1	Currently, Chile has equivalence determinations in place for the following: • For generic Escherichia coli (E. coli): four sampling sites for cattle and swine. • For Salmonella: 1. Year-round, on-going testing. 2. Immediate corrective actions required by establishments that display **positive result,** followed by additional sampling by the Servicio Agrícola y Ganadero (SAG) to verify the effectiveness of the establishment's corrective actions. 3. Four sampling sites for cattle and swine 400 cm2 are sampled, 1 00 cm2 from each sampling site. **4. Sample analysis by private laboratories**	**Please consider the following as clarification:** • For the case of Salmonella, corrective actions are required immediately when an establishment presents a fail. • In the case of the sample analysis by private laboratories, is important to remark that those are authorized by the Agricultural and Livestock Service
Page	**DRAFT FSIS AUDIT REPORT**	**AGRICULTURAL AND LIVESTOCK SERVICE COMMENTS**
I.	**INTRODUCTION.**	
2	• For Listeria monocytogenes (Lm): 1. The Lm control program 2. Screening method for RTE in meat and poultry VIDAS Lm Xpress (03/09/11) 3. Detection and confirmation method VIDAS LM02 (07 /06/09).	**Please consider the following as clarification:** Actualization of methodologies, for RTE, Salmonella, E. coli O157:H7 (Only in beef products) and Listeria monocytogenes (Lm), which have FSIS equivalence: 1. Lm: Screening VIDAS LM02 AFNOR BIO 12/11-03/04 and confirmation by ISO 11290-1. 2. Salmonella: Screening Vidas Easy SLM AFNOR BIO 12/16-09/05 and confirmation ISO 6579. 3. E. coli O157:H7: Screening VIDAS UP O157: H7 AFNOR BIO 12/25-05/09 o VIDAS ECO AFNOR 12/8-07/00 and confirmation by: a. Inmunoconcentration MLG 5.08 29/06/2014 o

		VIDAS ICE AFNOR BIO 12/8-07/00. b. Agar Fluorocult or Agar Chrome ID. c. Biochemical MLG 5.08 29/06/2014 or identification API. d. Serology Agglutination RIM REMEL 12076. e. EAE Factors, STX1 and/or STX2 MLG 5.08 29/2014.
	• For E. coli 0157:H7: The National Program for E. coli 0157:H7: 1. Screening method VIDAS ECO (07 /08/09). 2. Confirmatory method VIDAS ICE (07/08/09). 3. Screening method in RTE meat VIDAS ECPT (03/09/11).	For E. coli 0157:H7: The National Program for E. coli 0157:H7: • E. coli O157:H7: screening VIDAS UP O157:H7 AFNOR BIO 12/25-05/09 o VIDAS ECO AFNOR 12/08-07/00 and confirmation by: a. Inmunoconcentration MLG 5.08 29/06/2014 o VIDAS ICE AFNOR BIO 12/8-07/00. b. Agar Fluorocult or Agar Chrome ID. c. Biochemical MLG 5.08 29/06/2014 OR IDENTIFICATION API. d. Agglutination Serology RIM REMEL 12076. e. EAE Factors, STX 1 and /or STX 2 MLG 5.08 29/2014.
Page	**DRAFT FSIS AUDIT REPORT**	**AGRICULTURAL AND LIVESTOCK SERVICE COMMENTS**
IV. COMPONENT ONE: GOVERNMENT OVERSIGHT (ORGANIZATION & ADMINISTRATION).		
4	The CCA's inspection responsibilities are managed from 15 Regional Offices (RO). Each RO has one or two Regional Supervisors (RS) who conduct periodic supervisory reviews. **There are 64 local offices under these 15 ROs. In each local office, an official veterinary officer serves as a field supervisor over the official veterinarians assigned in the establishments.**	**Please consider the following , as a clarification:** • There are 65 local offices under the jurisdiction of the regional directions. • It is the responsibility of the Regional Supervisors to verify the adequate actions of the Official Veterinarians assigned to the establishments. Many times, these supervisors are found physically working in the sectorial offices.
Page	**DRAFT FSIS AUDIT REPORT**	**AGRICULTURAL AND LIVESTOCK SERVICE COMMENTS**
4	**The CCA has established a minimum of at least one supervisory review every four months for export slaughter establishments and at least once every six months for export processing establishments**. All three audited regions met the CCA's established frequency.	**Please consider the following, as a clarification:** • In the actual model, the supervision is directed to the inspection team or official veterinarian (OV), in the slaughterhouses or processing establishments for exportation, respectively.

Page	DRAFT FSIS AUDIT REPORT	AGRICULTURAL AND LIVESTOCK SERVICE COMMENTS
V. COMPONENT TWO: STATUTORY AUTHORITY AND FOOD SAFETY REGULATIONS (INSPECTION SYSTEM OPERATION AND PRODUCT STANDARD).		
6	During the CCA's headquarters audit, the FSIS auditor verified the regulatory authority maintained by the CCA as outlined in official legislation, regulations, and other instructions issued in accordance with: • Standard 62 (General Technical Standards on Veterinary Inspection of Livestock for Food and Meat with Aptitude Qualification Criteria for Human Consumption). • Law 20380 (Animal Protection); • Fax 523-09 (Animal Welfare in Bovine, Ovine and Swine Establishments). **• Law 117 (General Technical Standards on Veterinary Inspection of Poultry and their Meats).**	**Please consider the following, as a clarification** • The technical standard for veterinarian inspection in poultry products corresponds to a technical standard and not a law. This is equivalent to technical standard Nº 62
7	The following laws, regulations, and resolutions provide the CCA with the legal authority to oversee production activities of establishments that intend to export meat and poultry products to the United States:	**Please consider the following, to complement the report** • In this point we consider adequate to include two more regulation frameworks that are used by SAG: Supreme Decree 94. Approves regulations regarding the structure and functioning of Slaughterhouses, Refrigerating Chambers and Butchering Plants and establishes minimum equipment requirements for those establishments. Resolution 1045. Establishes specific requirements for Prerequisite programs and HACCP for the implementation of the system that guarantees quality and replaces resolution N° 4577 from 2012.
Page	**DRAFT FSIS AUDIT REPORT**	**AGRICULTURAL AND LIVESTOCK SERVICE COMMENTS**
VI. COMPONENT THREE: SANITATION.		
7	The evaluation of the sanitation component included an analysis of information provided by the CCA through the SRT, interviews, and observations during the on-site portion of the audit. The CCA's sanitation requirements are contained in the following documents:	**Please consider the following, to complement the report** In this point we consider adequate to include two more regulation frameworks that are used by SAG: Supreme Decree 94. Approves regulations regarding the structure and functioning of Slaughterhouses, Refrigerating Chambers and Butchering Plants and establishes minimum

		equipment requirements for those establishments. Resolution 1045. Establishes specific requirements for Prerequisite programs and HACCP for the implementation of the system that guarantees quality and replaces resolution N° 4577 from 2012.
Page	**DRAFT FSIS AUDIT REPORT**	**AGRICULTURAL AND LIVESTOCK SERVICE COMMENTS**
VII. COMPONENT FOUR: HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEMS.		
9	The CCA's HACCP requirements are contained in the following documents: Decree 94 (Approves Regulations Regarding Slaughterhouse, Refrigerating Establishment, Refrigerating Chamber and Butchering Plant Structure and Operations and Establishes Minimum Equipment Requirements for Those Establishments). Fax 5338 (2005- Resolution Setting Health Measure for the Destruction of Ruminant Offal as Stated). Fax 1363 (Meat Exports to the United States), and Instructions on Official Verification and Self-Regulation of E. coli 0157:H7 in Ground Beef, Trimming, Tenderized Meat, Marinated Meat, and Beef Hamburgers for Export to the United States; and **Project no. 322 (Generic Manual Quality Assurance Systems).**	**Please consider the following, to complement the report** In this point we consider adequate to include two more regulation frameworks that are used by SAG: 1. Resolution 1045. Establishes specific Requirements of the Prerequisites Programs and HACCP for the Implementation of the system that guarantees the quality and replaces the resolution N° 4577 from 2012. 2. Resolution 2592. Establishes requirements for inspection and sanitary certification for the exporting human consumption sub products and products. **Clarification:** Project no. 322. Is the HACCP generic manual. This manual was cancel before the FSIS audit.
Page	**DRAFT FSIS AUDIT REPORT**	**AGRICULTURAL AND LIVESTOCK SERVICE COMMENTS**
VIII.COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUES CONTROL PROGRAMS.		
10	The auditor noted that the implementation of the plan at the headquarters, laboratory, regional, and in-plant levels is proceeding in the manner outlined in the plan, and that sampling is occurring on time and in the manner designated. Analyses are completed in a timely manner, and results are distributed as directed. **Enforcement measures are delegated to another agency, Animal Health.**	**Please consider the following, to complement the report** • The measures taken in case of a positive result are carried out by official veterinarians in the establishment, and by the official veterinarians in the sectorial office. • If the finding corresponds to a prohibited substance, in addition to the above, the investigation is derived to the Register and Control of Veterinarian Medication Unit, which belongs to the Sub Department of Animal Health of the Livestock Protection Division of SAG.

10	All violative results are immediately reported to that agency, and Animal Health personnel act by retaining products, destroying products, launching recalls, farm quarantines, and risk communication plans as appropriate to the violative substance.	**Please consider the following, as a clarification** All the results out of limits are informed by the Residues Control Unit by the analysis laboratory. This Unit dictates the actions that proceed: retention, suspension of the certification process, recall and other actions in association with the Ministry of Health, like farm quarantine and destruction of products. Besides the aforementioned, risk communication plan is activated in relation to the detected substance.

Page	DRAFT FSIS AUDIT REPORT	AGRICULTURAL AND LIVESTOCK SERVICE COMMENTS
IX.COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS.		
12	**Testing for generic E. coli** The CCA has adopted the FSIS regulatory requirements for testing for generic E. coli, with the exception of electing four sampling sites on a carcass, which was determined to be equivalent by FSIS in 2005. The FSIS auditor accompanied and observed the in-plant inspection verification activities for Salmonella and generic E. coli sample collection. Sampling and testing for generic E. coli was conducted in accordance with Microbiological Sampling Procedure in export slaughter establishments **P-PP-IT-1** in all of the four audited establishments.	**Please consider the following, as a clarification:** • The codification of the Microbiological Sampling Procedure in export slaughter establishments is D-CER-VPE-PP-003 version 01.
Page	**DRAFT FSIS AUDIT REPORT**	**AGRICULTURAL AND LIVESTOCK SERVICE COMMENTS**
IX.COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS.		
13	**The testing program for E. coli 0157:H7 and non-0157 Shiga-toxin producing E. coli in raw beef** **Products.** The testing program for E. coli 0157:H7 in raw beef had previously been determined as equivalent by FSIS. The CCA samples raw beef trimmings and cuts designated for grinding by its established sampling frequencies and methods. The FSIS auditor verified through document 12 review that the inspection personnel collect	**Please consider the following, as a clarification:** The official samples are analyzed in an governmental laboratory through an analytical method: E. coli O157:H7: screening VIDAS UP O157:H7 AFNOR BIO 12/25-05/09 o VIDAS ECO AFNOR 12/08-07/00 and confirmation by: a) Inmunoconcentration MLG 5.08 29/06/2014 o VIDAS ICE AFNOR BIO 12/8-07/00. b) Agar Fluorocult or Agar Chrome ID.

	one sample per month in one audited bovine slaughter and processing establishment that exports beef trimmings to the United States. The in-plant inspection personnel have received training on sample collection described in E. coli 0157:H7 Official Instructive. **The official samples are analyzed in the government laboratory by a screening method (VIDAS UP AFNOR N° BIO 12/25-05/09). The FSIS auditor verified that lots with positive results for E. coli 0157:H7 are segregated and identified as "Not approved for export to the United States." During the course of the on-site audit and on February 28, 2014, the CCA submitted its non-0 157 Shiga-toxin producing E. coli testing program to FSIS. FSIS determined that the information showed that the CCA met the equivalence criteria for control measures over non-0 157 Shiga-toxin producing E. coli testing program to FSIS. FSIS determined that the information showed that the CCA met the equivalence criteria for control measures over non-0 157 Shiga-toxin producing E. coli.**	c) Biochemical MLG 5.08 29/06/2014 OR IDENTIFICATION API. d) Agglutination Serology RIM REMEL 12076. e) EAE Factors, STX 1 and /or STX 2 MLG 5.08 29/2014. STEC no-O157: screening GDS MPX TOP 7 STEC AOAC 071301 Biocontrol and confirmation: a) Magnetic Inmunoseparation MLG 5B.05 29/06/2014 Poly IMS IMS Panel, VIDAS UP ESPT. b) Agar sow 5B.05 or Chrome ID EHEC. c) Biochemical MLG 5B.05 29/06/2014 or System API. The FSIS auditor verified that lots with positive results for E. coli 0157:H7 are segregated and identified as "Not approved for export to the United States." During the course of the on-site audit and on February 28, 2014, the CCA submitted its non-0 157 Shiga-toxin producing E. coli testing program to FSIS. FSIS determined that the information showed that the CCA met the equivalence criteria for control measures over non-O157 Shiga-toxin producing *E. coli.*

The Agricultural and Livestock Service reaffirms, through this means, its compromise with the Food Safety and Inspection Service (FSIS) to maintain the guarantees that gave origin to the equivalency between both systems.

El Servicio Agrícola y Ganadero (SAG) ha reforzado las instrucciones en relación a la inspección post mortem en aves considerando la normativa de Estados Unidos. El compromiso de este Servicio es dar las garantías de que los establecimientos faenadores de aves habilitados para Estados Unidos, cumplen con la normativa exigida por este mercado.

Para complementar la respuesta enviada al informe borrador, se han emitido las siguientes instrucciones tanto para las oficinas regionales del SAG y equipos de inspección oficial como para los establecimientos y asociación que los representa.

1. Se ha solicitado mediante cartas oficiales a la asociación de productores de aves S.A. (APA) y a los establecimientos faenadores de aves habilitados para exportar a Estados Unidos, tomar las acciones necesarias para que ajusten la velocidad de línea de faenamiento de aves de acuerdo al número de inspectores oficiales que realizan la inspección post mortem en la zona de post eviscerado, con el objetivo que se cumpla con lo exigido por Estados Unidos.

2. Con el objeto de complementar las instrucciones enviadas mediante Circular N° 363/2015, **Instrucciones para establecimientos faenadores de aves de exportación habilitados para Estados Unidos**, se ha instruido mediante la Circular N° **404/2015** lo siguiente:

    a. El Equipo de inspección Oficial SAG (EIO) del establecimiento deberá verificar al menos una (1) vez por turno que, la velocidad de línea de faenamiento de aves y el número de inspectores oficiales que realizan la inspección post mortem en la zona del post eviscerado, permita que cada inspector oficial inspeccione un máximo de 35 pollos por minuto y un máximo de 26 pavos por minuto.

    b. El registro de dicha verificación, deberá realizarse en el formulario "Inspección veterinaria de aves de corral y sus carnes", F-CER-VPE-PP-029, en la sección observaciones generales del 3.2.

    Inspección veterinaria posterior al eviscerado, Ítem III PAUTA DE INSPECCION POST MORTEM.

    c. En cada supervisión regional que se realice, se debe incluir la verificación del cumplimiento de los puntos anteriores (a y b).

Junto a lo anterior, como parte del proceso modernizador del Servicio, se ha iniciado el proceso de modificación, en el Sistema de Gestión de Calidad del SAG, de la pauta de evaluación para habilitación de establecimientos faenadores para exportar carne de ave a EE.UU. (F-PP-IT-058), en donde se incorporan las siguientes modificaciones (se adjunta propuesta):

a. Se elimina el punto N° 145 ya que corresponde a una instrucción para los equipos oficiales siendo la pauta un instrumento a aplicar a los establecimientos faenadores de aves que se quieran habilitar para exportar a Estados Unidos.

b. Debido a la eliminación del punto 145, el punto 147 ha pasado a ser el punto 146, el cual a su vez se ha corregido, quedando de la siguiente forma:

146	La velocidad de línea se establece de manera que se pueda llevar a cabo la inspección post mortem eficientemente y se cumpla con un máximo de hasta 35 aves por inspector oficial para el caso de los pollos y de 26 aves por inspector oficial para el caso de los pavos. La velocidad máxima a la cual cada línea puede operar, la determina el inspector oficial a cargo.

[LOGO – SAG Ministry of Agriculture; Government of Chile]

The Agriculture and Livestock Service (SAG) has consolidated its instructions in regards to post-mortem inspections carried out on poultry, taking the United States regulations into consideration. This Service is obliged to guarantee that the slaughterhouses that export poultry meat to the United States comply with the regulations imposed by this market.

By way of complimenting the response to the draft report, the following instructions have been issued for the regional offices of SAG and the official inspection teams as well as the establishments and their corresponding representative associations.

1. Through official letters sent to the association of poultry producers S.A. (APA) and poultry slaughterhouse establishments authorized for exporting to the United States, the necessary actions were requested in order for the frequency of the poultry slaughter lines to be adjusted accordingly to the number of official inspectors who carry out the post-mortem inspection in the post-gutting area with the end objective of ensuring compliance with United States regulation.

2. By way of complimenting the instructions send in the Circular No. 363/2015, **Instructions for poultry slaughterhouse establishments authorized to export to the United States**, the following instructions have been issued in the Circular No. **404/2015**:

   a) The SAG Official Inspection Team (EIO) of the establishment in question must verify that the frequency of the poultry slaughter lines as well as the number of official inspectors who carry out the post-mortem inspection in the post-gutting area ensure that each official inspector inspects no more than 35 chickens per minute and a maximum of 26 turkeys per minute.

   b) These checks must be recorded on the "Veterinary Inspection of Poultry and Poultry Meats", or F-CER-VPE-PP-029 form, in the general observations section 3.2.

      Post-gutting veterinary inspection, Item III POST-MORTEM INSPECTION GUIDELINES.

      a. In each regional supervision carried out, the verification of compliance with the abovementioned points (a and b) must be included in the record.

[LOGO – SAG Ministry of Agriculture; Government of Chile]

In addition to this and as part of the modernization process undertaken by the Service, the modification process of SAG's Quality Management System has been initiated in accordance with the evaluation guidelines for the authorization of slaughterhouse establishments for exportation to the US (F-PP-IT-058), incorporating the following changes (the proposal is attached):

a. Point 145 has been removed as it is instructions for official teams and is applicable to poultry slaughterhouse establishments awaiting authorization for exportation to the United States.

b. Due to the removal of point 145, point 147 has become point 146, which has been corrected and is now as follows:

146	The frequency of the lines is established in such a way that allows for the post-mortem inspections to be carried out efficiently and to ensure that a maximum of up to 35 birds per official inspector for chicken and 26 birds per official instructor for turkeys. The maximum that each line can operate is determined by the official inspector in charge.

CARTA Nº 3419/2015

SANTIAGO, 18/06/2015

SEÑOR
JUAN MIGUEL OVALLE GARCÉS
PRESIDENTE
ASOCIACIÓN DE PRODUCTORES AVÍCOLAS DE CHILE A.G. (APA)
ISIDORA GOYENECHEA 2939, OFIC. 701, LAS CONDES,

Junto con saludar, a través de la presente, informo a usted que como resultado de la auditoría realizada por el FSIS, USDA, al sistema de control de la producción de la carne de ave y sus productos para la exportación a Estados Unidos, efectuada entre el 17 de febrero y el 7 de marzo del año 2014, se determinó que la inspección post mortem post eviscerado no cumplía con los requisitos exigidos por la normativa de Estados Unidos, en relación al número de aves por minuto inspeccionadas por cada inspector oficial (9 CFR 381.76). De acuerdo a la regulación de Estados Unidos, el máximo de aves por minuto por inspector oficial, corresponde a 35 pollos y 26 pavos.

Como es de su conocimiento, durante los meses de abril y mayo de 2015, el Servicio Agricola y Ganadero (SAG) implementó la contratación y puesta en marcha de personal oficial adicional en los establecimientos faenadores de aves (pollos) habilitados para exportar a Estados Unidos.

Considerando lo anterior, solicito a usted coordinar las acciones necesarias para que los establecimientos faenadores de aves habilitados para exportar a Estados Unidos, ajusten su velocidad de línea de faenamiento de aves de acuerdo al número de inspectores oficiales que realizan la inspección post mortem en la zona de post eviscerado, con el objetivo que se cumpla con lo exigido por Estados Unidos.

Saluda atentamente a usted,

JOSÉ IGNACIO GÓMEZ MEZA
JEFE (TYP) DIVISIÓN PROTECCIÓN PECUARIA

DGM/COV/HRP

c.c.: Francisca Herrera Monasterio Directora Regional (TyP) Dirección Regional de Valparaiso Or.V
Oscar Enrique Concha Díaz Director Regional Servicio Agricola y Ganadero Región Metropolitana de Santiago Or.RM
Juan Rodrigo Sotomayor Cabrera Director (TyP) Región de O'Higgins Servicio Agrícola y

Ganadero Or.VI
Jorge Fuller Catalán Encargado Protección Pecuaria Región de Valparaíso Or.V
Ricardo Ruben Aguilera Guzmán Enc. Regional Prot.Pecuaria SAG RM Protección Pecuaria Región Metropolitana Or.RM
Maria Patricia Miranda Cerda Encargado(a) Protección Pecuaria Región de O'Higgins Or.VI

División Protección Pecuaria - Paseo Bulnes N° 140

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[LOGO – SAG Ministry of Agriculture; Government of Chile]

LETTER NO. 3419/2015

SANTIAGO, 18/06/2015

Mr
JUAN MIGUEL OVALLE GARCES
PRESIDENT
CHLEAN ASSOCIATION OF POULTRY FARMERS A.G. (APA)
ISIDORA GOYENECHEA 2939, OFIC. 701, LAS CONDES,

Greetings. I would like to inform you that as a result of the assessment carried out by FSIS, USDA, of the control systems employed for the production of poultry meat and its derivatives for exportation to the United States between 17th February and 7th March of the year 2014, it was established that the post-mortem and post-gutting inspection did not comply with the requirements imposed by United States regulations in relation to the number of bird inspected per minute for every official inspector (9 Cf 381.76). In accordance with United States regulations, the maximum number of birds inspected per minute for every official inspector is 35 for chicken and 26 for turkey.

As you already know, during the months of April and May 2015, the Agriculture and Livestock Service (SAG) contracted additional official personnel and put them to work in the poultry slaughterhouse establishments (chicken) authorized for exportations to the United States.

Taking this into consideration, I would like to request that you coordinate the implementation of the necessary actions in order for the poultry slaughterhouse establishments authorized to export to United States to adjust the poultry slaughter line frequency in accordance with the number of official inspectors carrying out the post-mortem inspection in the post-gutting area to ensure compliance with United States regulations.

Kindest regards,

[SIGNATURE]

JOSE IGNACIO GOMEZ MEZA
HEAD (TYP) OF THE ANIMAL PROTECTION DIVISION

DGM/COV/HRP

c.c.: Francisca Herrera Monasterio: Regional Director (TyP) Regional Director for Valparaiso Or.V
Oscar Enrique Concha Diaz: Regional Director of the Agriculture and Livestock Service in the Metropolitan Region of Santiago Or.RM
Juan Rodrigo Sotomayor Cabrera: Director (TyP) O'Higgins Region, Agriculture and Livestock Service Or.VI

Jorge Ruller Catalán Responsible for Animal Protection in the Region of Valparaiso Or.V

Ricardo Ruben Aguilera Guzman Regional Director for the SAG Animal Protection Division RM Animal Protection of the Metropolitan Region Or.RM

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Animal Protection Division – Paseo Bulnes No. 140

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CIRC. Nº : 404/2015

ANT. : CIRCULAR N° 363/2015

MAT. : INSTRUCCIONES EQUIPOS INSPECCION OFICIAL ESTABLECIMIENTOS FAENADORES DE AVES HABILITADOS PARA ESTADOS UNIDOS

SANTIAGO, 19/06/2015

DE : JEFE (TYP) DIVISIÓN PROTECCIÓN PECUARIA OR.OC

A : SEGÚN DISTRIBUCIÓN

Junto con saludarles muy cordialmente y en relación a la inspección post mortem en los establecimientos que están habilitados o se quieran habilitar para exportar carne de ave y sus productos derivados, al mercado de Estados Unidos y a modo de complementar las instrucciones enviadas mediante Circular N° 363/2015, **Instrucciones para establecimientos faenadores de aves de exportación habilitados para Estados Unidos**, me permito instruir lo siguiente:

1.- El Equipo de inspección Oficial SAG (EIO) del establecimiento deberá verificar al menos una (1) vez por turno que, la velocidad de línea de faenamiento de aves y el número de inspectores oficiales que realizan la inspección post mortem en la zona del post eviscerado, permita que cada inspector oficial inspeccione un máximo de 35 pollos por minuto y un máximo de 26 pavos por minuto.

2.- El registro de dicha verificación, deberá realizarse en el formulario "Inspección veterinaria de aves de corral y sus carnes", F-CER-VPE-PP-029, en la sección observaciones generales del 3.2. Inspección veterinaria posterior al eviscerado, Ítem III PAUTA DE INSPECCION POST MORTEM.

En el documento referido, se deberá registrar:

i. Nombre de inspector oficial y hora de la verificación.
ii. Velocidad de línea por minuto (número de aves (pollos o pavos) faenadas por minuto).
iii. Número de inspectores que realizan inspección post mortem en zona de post eviscerado.
iv. Número de aves (pollos o pavos) por inspector por minuto, el cual se obtendrá mediante la siguiente fórmula:

N° aves por inspector por minuto = V°/I°

V°: Velocidad de línea por minuto (número de aves (pollos o pavos) faenadas por minuto).

I°: Número de inspectores que realizan inspección post mortem en zona de post eviscerado.

3.- En cada supervisión regional que se realice, se debe incluir la verificación del cumplimiento de los puntos anteriores (1 y 2).

Finalmente, se solicita instruir a quién corresponda, para asegurar el cumplimiento de lo requerido.

Saluda atentamente a Ud.

JOSÉ IGNACIO GÓMEZ MEZA
JEFE (TYP)
DIVISIÓN PROTECCIÓN PECUARIA

DGM/COV/HRP

Incl.: Documento Digital: CIRCULAR N° 363/2015

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[LOGO – SAG Ministry of Agriculture; Government of Chile]

CIRCULAR NO.: 404/2015

ANT: CIRCULAR NO. 363/2015

MAT: INSTRUCTIONS FOR OFFICIAL INSPECTION TEAMS AT POULTRY SLAUGHTERHOUSE ESTABLISHMENTS AUTHORIZED FOR EXPORTATIONS TO THE UNITED STATES

SANTIAGO, 19/06/2015

FROM: THE HEAD (TYP) OF THE ANIMAL PROTECTION DIVISION OR.OC

TO: DEPENDS ON REGIONAL DISTRIBUTION

Greetings. In relation to the post-mortem inspections carried out in those establishments which are authorized or are hoping to obtain authorization to export poultry meat and its derivative products to the United States market and by way of complimenting the instructions sent in the Circular No. 363/2015, **Instructions for poultry slaughterhouse establishments authorized to export to the United States,** allow me to provide the following instructions:

1. The SAG Official Inspection Team (EIO) of the establishment in question must verify that the frequency of the poultry slaughter lines as well as the number of official inspectors who carry out the post-mortem inspection in the post-gutting area ensure that each official inspector inspects no more than 35 chickens per minute and a maximum of 26 turkeys per minute.

2. These checks must be recorded on the "Veterinary Inspection of Poultry and Poultry Meats", or F-CER-VPE-PP-029 form, in the general observations section 3.2. Post-gutting veterinary inspection, Item III POST-MORTEM INSPECTION GUIDELINES.

In the abovementioned document, the following must be recorded:

i. Name of the official inspector and the time the checks were carried out.
ii. The line frequency per minute (number of birds (chicken or turkey) slaughtered per minute).
iii. Number of inspectors who carry out the post-mortem inspection in the post-gutting area.
iv. Number of birds (chicken or turkey) per inspector per minute, obtained using the following formula:

No. Birds per inspector per minute = V°/I°

V°: Line frequency per minute (number of birds (chicken or turkey) slaughtered per minute).

I°: Number of inspectors who carry out the post-mortem inspection in the post-gutting area.

3. In each regional supervision carried out, the verification of compliance with the abovementioned points (a and b) must be included in the record.

Finally, I would like to ask you to pass on these instructions to the relevant personnel in ensure to ensure compliance with the regulations.

Kindest regards,

[SIGNATURE]

JOSE IGNACIO GOMEZ MEZA
HEAD (TYP) OF THE ANIMAL PROTECTION DIVISION

DGM/COV/HRP

Incl: Digital Document: CIRCULAR No. 363/2015

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Juan Rodrigo Sotomayor Cabrera: Director (TyP) O'Higgins Region, Agriculture and Livestock Service Or.VI

c.c.: Claudio Anselmo Perez Zapata Responsible for the Regional Technical Unit of the Animal Protection Division Or.AyP
Jorge Ruller Catalán Responsible for Animal Protection in the Region of Valparaiso Or.V
Maria Patricia Miranda Cerda Responsible for Animal Protection in the O'Higgins Region Or.VI
Ricardo Ruben Aguilera Guzman, Responsible for the Regional Animal Protection Unit SAG RM of the Metropolitan Region Or.RM

Animal Protection Division – Paseo Bulnes No. 140

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CARTA Nº 3418/2015

SANTIAGO, 18/06/2015

SEÑOR
VICTOR LÓPEZ LEIVA
GERENTE DIVISIÓN INDUSTRIAL SOPRAVAL S.A
SOPRAVAL S.A.
J.GODOY S/N, ARTIFICIO LA CALERA, REGIÓN DE VALPARAÍSO.,

Junto con saludar, a través de la presente, informo a usted que como resultado de la auditoría realizada por el FSIS, USDA, al sistema de control de la producción de la carne de ave y sus productos para la exportación a Estados Unidos, efectuada entre el 17 de febrero y el 7 de marzo del año 2014, se determinó que la inspección post mortem post eviscerado no cumplía con los requisitos exigidos por la normativa de Estados Unidos, en relación al número de aves por minuto inspeccionadas por cada inspector oficial (9 CFR 381.76). De acuerdo a la regulación de Estados Unidos, el máximo de aves por minuto por inspector oficial, corresponde a 35 pollos y 26 pavos.

Durante los meses de abril y mayo de 2015, el Servicio Agricola y Ganadero (SAG) implementó la contratación y puesta en marcha de personal oficial adicional en los establecimientos faenadores de aves (pollos) habilitados para exportar a Estados Unidos.

Por lo anteriormente expuesto, se solicita que el establecimiento Sopraval S.A. (05-09) ajuste su velocidad de línea de faenamiento de aves de acuerdo al número de inspectores oficiales que realizan la inspección post mortem en la zona de post eviscerado con el objetivo que se cumpla con lo exigido por Estados Unidos.

Saluda atentamente a usted,

JOSÉ IGNACIO GÓMEZ MEZA
JEFE (TYP) DIVISIÓN PROTECCIÓN PECUARIA

DGM/COV/HRP

c.c.: Francisca Herrera Monasterio Directora Regional (TyP) Dirección Regional de Valparaiso Or.V
Jorge Fuller Catalán Encargado Protección Pecuaria Región de Valparaíso Or.V
Hugo Alejandro Araya Veliz Supervisor Regional Exportaciones Pecuarias Protección Pecuaria Región de Valparaíso Or.V
SANDRA LYDIA OLIVARES VEGA Encargado Sectorial Exportaciones Pecuarias Oficina Sectorial Quillota Or.V

División Protección Pecuaria - Paseo Bulnes N° 140

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[LOGO – SAG Ministry of Agriculture; Government of Chile]

LETTER NO. 3418/2015

SANTIAGO, 18/06/2015

Mr
VICTOR LOPEZ LEIVA
MANAGER OF THE INDUSTRIAL DIVISION SOPRAVAL S.A.
SOPRAVAL S.A.
J.GODOY S/N, ARTIFICIO LA CALERA, VALPARAISO REGION

Greetings. I would like to inform you that as a result of the assessment carried out by FSIS, USDA, of the control systems employed for the production of poultry meat and its derivatives for exportation to the United States between 17th February and 7th March of the year 2014, it was established that the post-mortem and post-gutting inspection did not comply with the requirements imposed by United States regulations in relation to the number of bird inspected per minute for every official inspector (9 Cf 381.76). In accordance with United States regulations, the maximum number of birds inspected per minute for every official inspector is 35 for chicken and 26 for turkey.

As you already know, during the months of April and May 2015, the Agriculture and Livestock Service (SAG) contracted additional official personnel and put them to work in the poultry slaughterhouse establishments (chicken) authorized for exportations to the United States.

Taking this into consideration, I would like to request that you coordinate the implementation of the necessary actions in order for Sopraval S.A. (05-09) to adjust the poultry slaughter line frequency in accordance with the number of official inspectors carrying out the post-mortem inspection in the post-gutting area to ensure compliance with United States regulations.

Kindest regards,

[SIGNATURE]

JOSE IGNACIO GOMEZ MEZA
HEAD (TYP) OF THE ANIMAL PROTECTION DIVISION

DGM/COV/HRP

c.c.: Francisca Herrera Monasterio: Regional Director (TyP) Regional Director for Valparaiso Or.V
Jorge Ruller Catalán Responsible for Animal Protection in the Region of Valparaiso Or.V
Hugo Alejandro Araya Veliz: Regional Animal Exports Supervisor Animal Protection Division, Valparaiso Region Or.V
SANDRA LYDIA OLIVARES VEGA Responsible for Animal Exports at the Quillota Office Or.V. 19-06-2015 16:38

Animal Protection Division – Paseo Bulnes No. 140

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CARTA Nº 3422/2015

SANTIAGO, 18/06/2015

SEÑOR
PATRICIO ULLOA
SUBGERENTE
AGROINDUSTRIAL EL PAICO S.A.
AVENIDA LOS LIBERTADORES N° 1714, EL MONTE, REGIÓN METROPOLITANA.,

Junto con saludar, a través de la presente, informo a usted que como resultado de la auditoría realizada por el FSIS, USDA, al sistema de control de la producción de la carne de ave y sus productos para la exportación a Estados Unidos, efectuada entre el 17 de febrero y el 7 de marzo del año 2014, se determinó que la inspección post mortem post eviscerado no cumplía con los requisitos exigidos por la normativa de Estados Unidos, en relación al número de aves por minuto inspeccionadas por cada inspector oficial (9 CFR 381.76). De acuerdo a la regulación de Estados Unidos, el máximo de aves por minuto por inspector oficial, corresponde a 35 pollos y 26 pavos.

Como es de su conocimiento, durante los meses de abril y mayo de 2015, el Servicio Agricola y Ganadero (SAG) implementó la contratación y puesta en marcha de personal oficial adicional en los establecimientos faenadores de aves (pollos) habilitados para exportar a Estados Unidos.

Por lo anteriormente expuesto, se solicita que el establecimiento Agroindustrial El Paico Ltda. (13-07) ajuste su velocidad de línea de faenamiento de aves de acuerdo al número de inspectores oficiales que realizan la inspección post mortem en la zona de post eviscerado con el objetivo que se cumpla con lo exigido por Estados Unidos.

Saluda atentamente a usted,

JOSÉ IGNACIO GÓMEZ MEZA
JEFE (TYP) DIVISIÓN PROTECCIÓN PECUARIA

DGM/COV/HRP

c.c.: Oscar Enrique Concha Díaz Director Regional Servicio Agricola y Ganadero Región Metropolitana de Santiago Or.RM
Ricardo Ruben Aguilera Guzmán Enc. Regional Prot.Pecuaria SAG RM Protección Pecuaria Región Metropolitana Or.RM
Pedro David Orellana Guerra Supervisor/a Regional de Exp. Pecuarias SAG RM Protección Pecuaria Región Metropolitana Or.RM

Maria Carolina Flores Chavez Supervisor/a Regional de Mataderos SAG RM Protección Pecuaria Región Metropolitana Or.RM
BARBARA MATURANA YAÑEZ Funcionario Oficina Sectorial Talagante Or.RM

División Protección Pecuaria - Paseo Bulnes N° 140

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[LOGO – SAG Ministry of Agriculture; Government of Chile]

LETTER NO. 3422/2015

SANTIAGO, 18/06/2015

Mr
PATRICIO ULLOA
SUB-MANAGER
AGRIBUSINESS EL PAICO S.A.
AVENIDA LOS LIBERTADORES NO 1714, EL MONTE, METROPOLITAN REGION

Greetings. I would like to inform you that as a result of the assessment carried out by FSIS, USDA, of the control systems employed for the production of poultry meat and its derivatives for exportation to the United States between 17th February and 7th March of the year 2014, it was established that the post-mortem and post-gutting inspection did not comply with the requirements imposed by United States regulations in relation to the number of bird inspected per minute for every official inspector (9 Cf 381.76). In accordance with United States regulations, the maximum number of birds inspected per minute for every official inspector is 35 for chicken and 26 for turkey.

As you already know, during the months of April and May 2015, the Agriculture and Livestock Service (SAG) contracted additional official personnel and put them to work in the poultry slaughterhouse establishments (chicken) authorized for exportations to the United States.

Taking this into consideration, I would like to request that you coordinate the implementation of the necessary actions in order for the Agribusiness establishment El Paico Ltda. (13-07) to adjust the poultry slaughter line frequency in accordance with the number of official inspectors carrying out the post-mortem inspection in the post-gutting area to ensure compliance with United States regulations.

Kindest regards,

[SIGNATURE]

JOSE IGNACIO GOMEZ MEZA
HEAD (TYP) OF THE ANIMAL PROTECTION DIVISION

DGM/COV/HRP

c.c.: Oscar Enrique Concha Diaz: Regional Director of the Agriculture and Livestock Service in the Metropolitan Region of Santiago Or.RM
Ricardo Ruben Aguilera Guzman: Responsible for the Regional Animal Protection Service of SAG RM Animal Protection in the Metropolitan Region Or.RM
Pedro David Orellana Guerra: Regional Supervisor for Animal Exports SAG RM Animal Protection Division in the Metropolitan Region Or.RM

Maria Carolina Flores Chavez: Regional Slaughterhouse Supervisor SAG RM Animal Protection Division in the Metropolitan Region Or.RM
BARBARA MATURANA YANEZ Office Assistant Talagante Or.RM

Animal Protection Division – Paseo Bulnes No. 140

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CARTA Nº 3450/2015

SANTIAGO, 19/06/2015

SEÑOR
HÉCTOR OLEA MATTE
GERENTE
FAENADORA SAN VICENTE LTDA.
CARRETERA H66G, KM 19.2,SAN VICENTE DE TAGUA TAGUA, REGION DEL LIBERTADOR GRAL.BERNARDO O´HIGGINS.,

Junto con saludar, a través de la presente, informo a usted que como resultado de la auditoría realizada por el FSIS, USDA, al sistema de control de la producción de la carne de ave y sus productos para la exportación a Estados Unidos, efectuada entre el 17 de febrero y el 7 de marzo del año 2014, .se determinó que la inspección post mortem post eviscerado no cumplía con los requisitos exigidos por la normativa de Estados Unidos, en relación al número de aves por minuto inspeccionadas por cada inspector oficial (9 CFR 381.76). De acuerdo a la regulación de Estados Unidos, el máximo de aves por minuto por inspector oficial, corresponde a 35 pollos y 26 pavos.

Como es de su conocimiento, durante los meses de abril y mayo de 2015, el Servicio Agricola y Ganadero (SAG) implementó la contratación y puesta en marcha de personal oficial adicional en los establecimientos faenadores de aves (pollos) habilitados para exportar a Estados Unidos.

Por lo anteriormente expuesto, se solicita que el establecimiento Faenadora San Vicente Ltda. (06-08) ajuste su velocidad de línea de faenamiento de aves de acuerdo al número de inspectores oficiales que realizan la inspección post mortem en la zona de post eviscerado con el objetivo que se cumpla con lo exigido por Estados Unidos.

Saluda atentamente a usted,

JOSÉ IGNACIO GÓMEZ MEZA
JEFE (TYP) DIVISIÓN PROTECCIÓN PECUARIA

DGM/COV/HRP

c.c.: Juan Rodrigo Sotomayor Cabrera Director (TyP) Región de O'Higgins Servicio Agrícola y Ganadero Or.VI
Maria Patricia Miranda Cerda Encargado(a) Protección Pecuaria Región de O'Higgins Or.VI
Gustavo Adolfo Leyton Labarca Supervisor/a Regional de Inspección y Certificación Protección Pecuaria Región de O'Higgins Or.VI

Ana Ercilia Roa Troncoso Supervisor/a Regional de Inspección y Certificación Protección Pecuaria Región de O'Higgins Or.VI
Igor Fabián Pérez Pinar Jefe/a de Equipo San Vicente Oficina Sectorial San Vicente - Servicio Agrícola y Ganadero Or.VI

División Protección Pecuaria - Paseo Bulnes N° 140

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[LOGO – SAG Ministry of Agriculture; Government of Chile]

LETTER NO. 3450/2015

SANTIAGO, 19/06/2015

Mr
HECTOR OLEA MATTE
MANAGER
FAENADORA SAN VICENTE LTDA (SAN VICENTE SLAUGHTERHOUSE LTD)
CARRETERA H66G, KM 19.2, SAN VICENTE DE TAGUA TAGUA, EL LIBERATOR REGION
GRAL. BERNARDO O'HIGGINS,

Greetings. I would like to inform you that as a result of the assessment carried out by FSIS, USDA, of the control systems employed for the production of poultry meat and its derivatives for exportation to the United States between 17th February and 7th March of the year 2014, it was established that the post-mortem and post-gutting inspection did not comply with the requirements imposed by United States regulations in relation to the number of bird inspected per minute for every official inspector (9 Cf 381.76). In accordance with United States regulations, the maximum number of birds inspected per minute for every official inspector is 35 for chicken and 26 for turkey.

As you already know, during the months of April and May 2015, the Agriculture and Livestock Service (SAG) contracted additional official personnel and put them to work in the poultry slaughterhouse establishments (chicken) authorized for exportations to the United States.

Taking this into consideration, I would like to request that you coordinate the implementation of the necessary actions in order for the Establishment Faenadora San Vicente Ltda. (06-08) (San Vicente Slaughterhouse Ltd) to adjust the poultry slaughter line frequency in accordance with the number of official inspectors carrying out the post-mortem inspection in the post-gutting area to ensure compliance with United States regulations.

Kindest regards,

[SIGNATURE]

JOSE IGNACIO GOMEZ MEZA
HEAD (TYP) OF THE ANIMAL PROTECTION DIVISION

DGM/COV/HRP

c.c.: Juan Rodrigo Sotomayor Cabrera@ Director (TyP) for the O'Higgins Region at the Agriculture and Livestock Service Or.VI
Maria Patricia Miranda Cerda: Responsible for Animal Protection in the O'Higgins Region Or.VI
Gustavo Adolfo Leyton Labarca: Regional Inspection and Animal Protection Certification Supervisor in the O'Higgins Region Or.VI

Ana Ercilla Roa Troncoso: Regional Inspection and Animal Protection Certification Supervisor in the O'Higgins Region Or.VI
Igor Fabian Perez Pinar: Team Leader at the San Vicente Office in San Vicente – Agriculture and Livestock Service Or.VI

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