



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

JUL 2 2004

Dr. Nelmon Oliveira Costa
Director, Department of Inspection for
Products of Animal Origin/SDA
Pecuaria e Abastecimento (MAPA)
Ministry of Agriculture
Block D, 4th Floor, Room 407
70043-900 Brasilia DF
Brazil

Dear Dr. Costa:

The Food Safety and Inspection Service has completed a special audit of Brazil's meat inspection system. The audit was conducted November 10 - November 20, 2003. Comments from Brazil have been included as an attachment to the final report. Enclosed is a copy of the final audit report.

If you have any questions regarding the audit or need additional information, please contact me by telephone at 202.720.3781, by fax at 202.690.4040, or by email at sally.white@fsis.usda.gov.

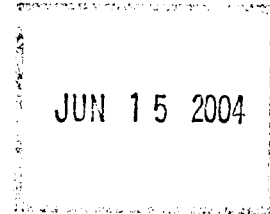
Sincerely,

Sally White
Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc: Oliver Flake/Kim Svec, Agricultural Attachés, U.S. Embassy, Brasilia
Colleen Magro, Trade Specialist, Embassy of Brazil, Washington, DC
Jeanne Bailey, FAS Area Officer
Amy Winton, State Department
Linda Swacina, Deputy Administrator, FSIS
Donald Smart, Director, Review Staff, PEER
Karen Stuck, Assistant Administrator, OIA
William James, Deputy Asst. Administrator, OIA
Sally White, Director, IES, OIA
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Mary Stanley, Director, IID, OIA
Nancy Goodwin, IES, OIA
Todd Furey, IES, OIA
Country File—Brazil-final to CVO Nov03

FINAL



FINAL REPORT OF A SPECIAL FOLLOW-UP AUDIT CARRIED OUT
IN BRAZIL COVERING BRAZIL'S MEAT INSPECTION SYSTEM

November 10 through November 20, 2003

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority, Departamento de Inspecao de Produtos de Origem Animal (DIPOA)
FSIS	Food Safety and Inspection Service

1. INTRODUCTION

The audit took place in Brazil from November 10 through November 20, 2003.

An opening meeting was held on November 10 in Brasilia with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the special, follow-up audit of Brazil's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA and/or representatives from the regional and local inspection offices.

2. OBJECTIVE OF THE AUDIT

This was a special, follow-up audit. The objective was to determine if establishment-paid inspectors were working in establishments certified for export (U.S.-certified) to the United States. The scope of the audit encompassed a review of records at the headquarters office in Brasilia pertaining to payment of the inspectors assigned to the U.S.-certified establishments, and a review of six establishments certified for export to the U.S. Among other things, the FSIS auditor reviewed a list of all inspectors working in each U.S.-certified establishment and the corresponding salary documentation for each employee for the period June 1, 2003 through September 30, 2003.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, four meat slaughter establishments, one meat processing establishment, and one cold storage facility.

Competent Authority Visits			Comments
Competent Authority	Central	1	
	Regional	0	
	Local	6	Establishment level
Meat Slaughter Establishments		4	
Meat Processing Establishments		1	
Cold Storage Facilities		1	

3. PROTOCOL

At the opening meeting, the auditor explained that Brazil's meat inspection system would be audited against a specific FSIS regulatory requirement which mandates that all inspection personnel working in establishments certified for export to the U.S. be paid by the government of the exporting country.

This audit was conducted in two parts. The first part involved visits with CCA officials to review documents pertaining to employment and payment of official inspectors. The second part involved on-site visits to six establishments: four slaughter establishments, one processing establishment, and one cold storage facility to ascertain what, if any,

inspection duties were being performed by establishment-paid inspectors. During the on-site establishment visits, the auditor reviewed daily records relating to assignment of inspectors to various inspection tasks and assessed how inspection services were carried out by DIPOA officials.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end).

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at www.fsis.usda.gov/OPPDE/FAS/index.htm

Past audits of Brazil's inspection system have shown problems pertaining to payment of inspectors working in the U.S.-certified establishments.

- During the February 1998 audit, FSIS found that Brazil was using non-government paid inspectors in some establishments. Subsequent to this 1998 audit, FSIS advised Brazilian officials in two conference calls and in writing that use of non-government paid inspectors was not acceptable. In January 1999, Brazilian government officials informed FSIS that action had been taken to resolve this problem.
- At the exit conference following the September 2003 audit, the FSIS auditor was informed that establishment-paid inspectors might be performing some official inspection duties in U.S.-certified establishments. In addition, the FSIS auditor was informed about a Brazilian law that permits use of establishment-paid personnel to work as auxiliaries in official establishments in certain situations.

6. MAIN FINDINGS

6.1 Government Oversight

The control of Brazil's meat inspection service is under the Ministerio of Agricultura e do Abastecimento with the section of Inspection of Products of Animal Origin specifically supervising the slaughter and inspection of meat products. Regional offices provide oversight of inspection in the regions with regional supervisors providing guidance for inspection activities.

6.1.1 Ultimate Control and Supervision

DIPOA has allowed establishment-paid employees to perform various official inspection duties. Therefore, DIPOA does not have ultimate control and supervision over official

activities of all employees. At the time of this audit, there were 185 establishment-paid employees working in 28 U.S.-certified establishments.

6.1.2 Assignment of Competent, Qualified Inspectors

In the six establishments visited on-site, there were 52 government (DIPOA) inspectors and 71 establishment-paid inspectors. All inspectors were assigned inspection tasks by the Chief of the Service at each establishment.

1. As inspectors in slaughter establishments, establishment-paid inspectors were assigned to perform the required post-mortem duties of head, viscera and carcass inspection.
2. In both slaughter and processing establishments, establishment-paid inspectors were performing "floor inspection duties." They were assigned primarily to enforce sanitation requirements.
3. In some cases, these establishment-paid employees work as secretaries and provide assistance to the Chief of Service in office work.

6.2 Headquarters Audit

The auditor conducted a review of inspection system documents at the headquarters of the CCA pertaining to employment of government and establishment-paid inspectors. This record review revealed the following concerns:

- There were 163 DIPOA inspectors and 185 establishment-paid inspectors working in the 28 U.S.-certified establishments.
- Brazilian law permits the use of establishment-paid inspectors in certain cases. This law also permits inspection employees to receive food and in certain situations transportation and subsidized or free housing.

7. ESTABLISHMENT AUDITS

As mentioned previously, six establishments were visited to assess the duties performed by DIPOA and establishment-paid employees. Seventy-one establishment-paid inspectors were observed performing official post-mortem inspection tasks and other official inspection tasks in these six establishments.

Staffing information by establishment is presented in the attached individual establishment review forms.

8. CLOSING MEETING

A closing meeting was held on November 20, 2003, in Sao Paulo with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

 Dr. M. Ghias Mughal
Deputy Director, Review Staff



9. ATTACHMENTS

Individual Foreign Establishment Audit Forms
Foreign Country Response to Draft Final Audit Report

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION BERTIN LTDA LINS SAO PAULO	2. AUDIT DATE Nov. 18, 03	3. ESTABLISHMENT NO. SIF 0337	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment:

Brazil Est. NO: SIF 0337

Date of Visit: November 12, 2003

49, 50 and 51. Information supplied by the Brazilian Government Officials indicated 16 out of 24 total employees performing various official inspection duties, were establishment-paid (Article 102) inspectors.-- 9 CFR 327.2 regulatory requirements were not met.

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

for Mansoor H. Chaudry 2/20/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Friboi, Ltda. Gioania Gioas	2. AUDIT DATE Nov. 12, 03	3. ESTABLISHMENT NO. SIF 0862	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Brazil Est. NO: SIF 0862

Date of Visit: November 12, 2003

49, 50, and 51: Information supplied by the Brazilian Government Officials indicated 23 out of 36 total employees performing various official inspection duties, were establishment-paid (Article 102) inspectors -- 9 CFR 327.2 regulatory requirements were not met.

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

for Mangor H. Chaudry 2/20/04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION FRIBOI Ltda. CAMPO GRANDE MATO GROSSO DO SUL	2. AUDIT DATE Nov. 19, 03	3. ESTABLISHMENT NO. SIF 1662	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Brazil Est. NO: SIF 1662

Date of Visit: November 12, 2003

49, 50 and 51: Information supplied by the Brazilian Government Officials indicated 10 out of 22 total employees performing various official inspection duties, were establishment-paid (Article 102) inspectors -- 9 CFR 327.2 regulatory requirements were not met.

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

M. Ghias Mughal

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION SADIA S/A Varzea Grande Mato Grosso	2. AUDIT DATE Nov. 13, 03	3. ESTABLISHMENT NO. SIF 2015	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Brazil Est. NO: SIF 2015

Date of Visit: November 12, 2005

49, 50 and 51: Information supplied by the Brazilian Government Officials indicated 11 out of 20 total employees performing various official inspection duties, were establishment-paid (Article 102) inspectors -- 9 CFR 327.2 regulatory requirements were not met.

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

Dr. Mughal H. Chauhan 2/20/04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION FRIGORIFICO ARAPUTANGA S/A ARAPUTANGA MATO GROSSO	2. AUDIT DATE Nov. 14, 03	3. ESTABLISHMENT NO. SIF 2979	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

50. Observation of the Establishment:

Brazil Est. NO: SIF 2979

Date of Visit: November 12, 2003

49, 50 and 51: Information supplied by the Brazilian Government Officials indicated nine out of 20 total employees performing various official inspection duties, were establishment-paid (Article 102) inspectors -- 9 CFR 327.2 regulatory requirements were not met.

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

for *Mansoor H. Chaudry* 2/20/04

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION LOCALFRIO S.A - ARMAZENS GERAIS FRIGORIFICOS GUARUJA SAO PAULO	2. AUDIT DATE Nov. 17, 03	3. ESTABLISHMENT NO. SIF 3155	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. M. Ghias Mughal		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Brazil Est. NO: SIF3155

Date of Visit: November 12, 2003

49, 50 and 51: Information supplied by the Brazilian Government Officials indicated one of two employees performing various official inspection duties were establishment-paid (Article 102) inspectors -- 9 CFR 327.2 regulatory requirements were not met.

61. NAME OF AUDITOR

Dr. M. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

Mansoor H. Chaudhry 2/20/04

/handwritten: Nancy Goodwin URGENT/

/seal/

FEDERAL PUBLIC SERVICE
DEPARTMENT OF AGRICULTURE, LIVESTOCK & SUPPLY
[Portuguese acronym: MAPA]
BUREAU OF LIVESTOCK PROTECTION [Portuguese acronym: SDA]
ANIMAL PRODUCTS INSPECTION SECTION [Portuguese acronym: DIPOA]
INTERNATIONAL TRADE CONTROL DIVISION [Portuguese acronym: DCI]

OFFICIAL LETTER No. 616/2004/DCI/DIPOA **BRASILIA, May 28, 2004**

From: Head of the International Trade Control Division-DCI
of the Animal Products Inspection Section-DIPOA

To: Mr. Oliver Flake – Acting Medical Advisor for Agricultural Affairs of the United States
Embassy in Brazil/Brasilia – Fax: 312-7659

Re: Forwarding reply to the “Draft Final Report of a Special Follow-up Audit carried out in
Brazil’s Meat Inspection System” performed by Dr. Ghias Mughal, of the FSIS/USDA,
from November 10 - 20, 2003

In reply to the “Draft Final Report of a Special Follow-up Audit carried out in Brazil’s
Meat Inspection System” performed by Dr. Ghias Mughal, of the FSIS/USDA, from
November 10 - 20, 2003, we report that:

- the situation mentioned by Dr. Ghias Mughal has already been solved, and at this
time, official inspection activities at facilities qualified to export to the United States
are only conducted by government-paid employees.
- in addition, announcements for public testing in connection with hiring over 114
veterinary doctors (agricultural and livestock supervisors), and over [illegible]
inspection agents for the Department of Agriculture, Livestock & Supply-MAPA
have already been published in the Official Daily [*Diário Oficial*] (enclosed).

Kind regards,
/illegible signature/
Ari Crispim dos Anjos
Agricultural & Livestock Supervisor
Head of the DCI/DIPOA

In agreement
May 28, 2004

/illegible signature/
Djalma /illegible/ Santos da Silva
Veterinary Doctor /illegible/ Veterinary Registration No. /illegible/
/illegible/
DIPOA Technical Assistant

/handwritten: IES 367
BW 6/2