



United States Department of Agriculture

Food Safety and
Inspection Service

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

Dr. Odilson Luiz Ribeiro E Silva
Under Secretary of the Office of International Affairs (SRI)
Ministry of Agriculture, Livestock and Food Supply (MAPA)
Esplanada dos Ministérios, Bloco D, Edifício Sede, 3º andar, Sala 300
70.043-900 Brasília, DF BRAZIL

Dear Dr. Silva,

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Brazil's meat inspection system from September 15 through October 3, 2014. Enclosed is a copy of the final audit report. The comments received from the government of Brazil are included as an attachment to the report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 720-8609, by facsimile at (202) 720-0676, or electronic mail at international.audit@fsis.usda.gov

Sincerely,

A handwritten signature in blue ink, appearing to read "Shaukat H. Syed".

Dr. Shaukat H. Syed
Director
International Audit Staff
Office of Investigation, Enforcement, and Audit

Enclosure

FINAL REPORT OF AN AUDIT CONDUCTED IN
BRAZIL

September 15 – October 3, 2014

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

April 10, 2015
Food Safety and Inspection Service
United States Department of Agriculture

Executive Summary

This report describes the outcome of an onsite equivalence verification audit conducted by the Food Safety and Inspection Service (FSIS) from September 15 – October 3, 2014, to determine whether Brazil’s food safety system governing the production of meat continues to be equivalent to that of the United States, with the ability to produce products that are unadulterated, safe, wholesome, and properly labeled.

The previous FSIS audit of Brazil’s meat inspection occurred from February 18 to March 14, 2013. During the period of time surrounding that audit, several violations were identified by FSIS at port-of-entry (POE) for ivermectin in beef. As a result of the POE violations, the Department of Inspection for Products of Animal Origin (DIPOA) was notified that FSIS would not certify any new establishments as eligible to export to the United States until these issues were satisfactorily addressed. Based on this history, Brazil was classified as a country with an “adequate” level of performance, for which FSIS determined that the current audit was warranted.

The 2014 audit results indicate that the Central Competent Authority (CCA)’s food safety inspection system is performing at an “adequate” level meeting the core criteria for all six equivalence components. FSIS identified operational (or procedural) weaknesses related to Statutory Authority and Food-Safety Regulations for targeting of animals suspected of presenting violative residue levels at ante-mortem, and Government Chemical Residue Control Program weaknesses in the CCA’s national residue monitoring program.

An analysis of the other observations within each component did not identify any systemic deficiencies that represent an immediate threat to public health. However, as the ability of the inspection system to ensure export of product that is safe, unadulterated, and properly labeled can be compromised if left unchecked, FSIS requests that CCA provide a detailed response for each of the identified findings within 60 calendar days of receipt of this report.

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

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I. INTRODUCTION

FSIS of the United States Department of Agriculture (USDA) conducted an onsite equivalence verification audit of Brazil's meat inspection system from September 15 to October 3, 2014.

The audit began with an entrance meeting held on September 15, 2014, in Brasilia with the participation of representatives from the CCA – DIPOA, and the FSIS International Audit Staff (IAS).

II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit objective was to ensure that Brazil's meat inspection system continues to be equivalent to that of the United States, with the capacity to produce products that are safe, unadulterated, and properly labeled.

During the audit, areas of special emphasis included:

- Corrective actions implemented by the CCA in response to the previous FSIS audit in 2013.
- Residue controls in response to violations identified at United States POE.
- Information recently provided by DIPOA via the foreign country self-reporting tool (SRT), concerning control of:
 - Thermally processed commercially sterile products
 - RTE products

In preparing for the audit, FSIS used a risk-based procedure to determine the audit scope which included an analysis of country performance within six equivalence components, production types and volumes, frequency of prior audit-related site visits, POE testing results, and specific oversight activities and testing capacities of government offices and laboratories. The review process included data collected by FSIS over a three-year timeframe in addition to information obtained directly from the CCA, through the SRT, outlining the structure of the country's inspection system and identifying any significant changes which have occurred since the last audit.

The FSIS auditor was accompanied throughout the entire audit by representatives from the CCA or representatives from the state and local inspection offices. Determinations concerning program effectiveness focused on performance within the following six components upon which system equivalence is based: (1) Government oversight, (2) Statutory Authority and Food Safety Regulations, (3) Sanitation, (4) HACCP Systems, (5) Chemical Residue Control Programs, and (6) Microbiological Testing Programs.

FSIS auditors reviewed administrative functions at CCA headquarters, two state, and five local inspection offices, during which the auditor evaluated the implementation of those management control systems in place that ensure that the national system of inspection, verification, and enforcement was being implemented as intended.

A sample of five (5) establishments was selected from 25 establishments certified to export to the United States. During the establishment visits, auditors closely examined the extent to which industry and government interact to control hazards and prevent non-compliances that threaten

food safety, with an emphasis on the CCA’s ability to provide oversight through supervisory reviews conducted in an equivalent manner as provided in 9 Code of Federal Regulations (CFR) 327.2.

Additionally, FSIS audited two laboratories to verify their ability to provide adequate technical support to the inspection system.

Competent Authority Visits		#	Locations
Competent Authority	Central	1	CCA (DIPOA) – Brasilia
	State Offices	2	<ul style="list-style-type: none"> • Inspection Service of Products of Animal Origin (SIPOA) Office – Cuiaba • SIPOA Office – Sao Paulo
Laboratories		2	<ul style="list-style-type: none"> • One private microbiology lab in Cuiaba • One government residue lab in Campinas
Establishments		5	<ul style="list-style-type: none"> • Three beef slaughter and processing establishments • Two beef processing establishments

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

- The Federal Meat Inspection Act (21 United States Code -- U.S.C. -- 601 et seq.).
- The Humane Methods of Livestock Slaughter Act (7 U.S.C. Title 7)
- The Federal Meat Inspection Regulations for Imported Products (9 CFR Part 327)

The audit standards applied during the review of Brazil’s meat inspection system included: (1) All applicable legislation originally determined by FSIS as equivalent as part of the initial review process, and (2) any subsequent equivalence determinations that have been made by FSIS under provisions of the Sanitary/Phytosanitary Agreement.

Brazil has equivalence determinations in place for the following:

- Private laboratories analyze samples for *Salmonella*.
- Establishment employees collect the samples for *Salmonella*.
- The CCA suspends an establishment from the list of certified establishments after the establishment has failed the third *Salmonella* set.

A detailed analysis of the CCA’s continued ability to meet the original commitments related to these equivalence determinations is provided under section X, Microbiological Testing Programs.

III. BACKGROUND

Brazil is eligible to export beef and pork products to the United States, although no pork products are currently being produced for the United States market. From January 1, 2013 to July 7, 2014, FSIS’ import inspectors performed 100 percent re-inspection for labeling and certification on 87,070,041 pounds of beef products exported by Brazil to the United States. FSIS also performed re-inspection on 19,207,138 pounds at POE for additional types of

inspection (TOI). Of these additional TOIs, a total of 26,762 pounds was rejected for non-food safety reasons (pink juice test) and 278,498 pounds were rejected for violative levels of avermectins. Brazil exports the following categories of products: thermally processed/commercially sterile, not heat-treated shelf stable, heat-treated shelf stable, and fully cooked not shelf stable.

FSIS conducted a follow-up examination of the CCA’s corrective action in response to the previous audit which took place from February 18 to March 14, 2013, during which FSIS identified deficiencies related to HACCP recordkeeping, frequency of supervisory reviews, SRM control, and the government microbiological verification program for verifying sanitary conditions in RTE establishments. In addition, the period of time surrounding the previous audit was accompanied by a series of violations identified by FSIS at POE for ivermectin in beef products.

As a result of these POE violations, the previous audit report directed DIPOA to evaluate, on a continuous basis, establishment compliance with ivermectin residue levels and to react accordingly when Maximum Residue Limits (MRLs) were exceeded. Furthermore, DIPOA was notified that FSIS would no longer accept certification of new establishments for export to the United States until improvements in the system were effectively implemented and communicated to FSIS.

Since the issuance of the prior audit report, FSIS identified four (4) additional violations for ivermectin in product received from Brazil, as summarized in the following table:

Product	Date Failed	Ivermectin Concentration Parts Per Billion (ppb)
		<i><u>FDA MRL in muscle (cattle)</u></i> <i>Prior to August 2014: 10 ppb</i> <i>Current MRL: 650 ppb</i>
Fully cooked, not shelf stable (beef)	03/03/2014	19.6
Fully cooked, not shelf stable (beef)	03/28/2014	30.9
Fully cooked, not shelf stable (beef)	05/16/2014	42.1
Thermally processed, commercially sterile (beef)	08/01/2014	12.35

On June 6, 2014, FSIS began refusing the import of frozen cooked beef from one Federal Inspection Service (SIF) establishment, based on the lack of information provided by the DIPOA in response to FSIS’ notification of the above-referenced violations identified at POE. An additional discussion related to the CCA’s ability to provide FSIS with timely responses regarding POE violations can be found under section 4 of this report, Government Oversight.

The FSIS final audit reports for Brazil's Food Safety System are available on the FSIS' website at:

<http://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/importing-products/eligible-countries-products-foreign-establishments/foreign-audit-reports>

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

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

The DIPOA is under the Ministry of Agriculture, Livestock and Supply (MAPA), and is comprised of several divisions including: General Coordination for Inspection, General Coordination for Special Programs, and International Export and Import Programs Coordination Division that are involved with production of meat product destined for export to the United States. DIPOA ensures uniform implementation of regulatory requirements and is responsible for oversight of the official activities of inspection personnel at establishments eligible to export to the United States. In June of this year, DIPOA notified FSIS of the addition of the Office of International Affairs (SRI) within MAPA, and that all subsequent communication should be addressed through this office.

- FSIS requires that foreign governments maintain a communication system to convey requirements related to United States export throughout its inspection system in a timely manner. In the case of the last POE violation identified by FSIS, notification to the local inspection office/establishment took approximately 40 days. This ultimately impacted CCA's ability to investigate, implement measures to prevent recurrence, and provide a response regarding this violation to FSIS in an appropriate timeframe.

The CCA's authority to enforce inspection laws is specified in Brazil's statute, *Regulations for the Inspection of Industrial Sanitation for Products of Animal Origin* (RIISPOA). To achieve this objective, the CCA issues, distributes, and enforces a number of official circulars that provide inspection-related guidelines and instructions to its inspection personnel.

RIISPOA articles 20 to 76 specify that establishments intending to register with the Federal Inspection Service must present the following approved aspects: the land on which they intend to build, the plans (location, cross sections, ground plan, layout) and specifications (listing products they intend to make, slaughter speed and capacity, temperatures of air-conditioned environments and other information).

- The FSIS auditor noted that two establishments were incorrectly registered and approved by DIPOA for processes they no longer had the equipment to conduct. DIPOA had

incorrectly approved one establishment for thermal processing and the production of frozen cooked beef, while another was incorrectly approved for the production of beef jerky. The failure to maintain accurate registration of establishments can ultimately impact DIPOA's ability to provide adequate coverage of United States-eligible establishments and prevent any potential errors with regard to export certification.

Each state of Brazil has a "Federal Agriculture Agency" (SFA-UF) headed by a superintendent, which is linked directly to the Executive Secretariat of MAPA. These state agencies (SIFISAs, SISAs, and SIPOAS) work inside the SFA-UFs in accordance with the latest restructuring outlined in Ordinance 428/2010. These offices are responsible for the implementation and enforcement of inspection operations in the slaughterhouses, processing plants, and cold storage facilities within the state and also provide periodic supervisory reviews for the United States-eligible establishments. At the establishment level, the Federal Inspection Service (SIF) has responsibility to implement and enforce inspection laws at the establishments eligible to export meat products to the United States.

The Brazilian government continues to organize and administer the country's meat inspection system, and CCA officials are assigned to enforce laws and regulations governing production and export of meat at certified establishments -- a system that continues to meet the core requirements for this component.

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

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

The second of the six equivalence components that the FSIS auditor reviewed was Statutory Authority and Food Safety Regulations (SAFSR).

The inspection system must provide for humane handling and slaughter of livestock; ante-mortem inspection of animals; post-mortem inspection of carcasses and parts; controls over condemned materials; controls over establishment construction, facilities, and equipment; daily inspection; periodic supervisory visits to official establishments; and requirements for thermally processed/commercially sterile products.

The CCA's authority to enforce inspection laws is specified in Brazil's statute, RIISPOA. To achieve this objective, the CCA issues, distributes, and enforces a number of official circulars that provide inspection-related guidelines and instructions to its inspection personnel.

RIISPOA articles 20 to 76 specify that establishments intending to register with SIF must identify the land on which they intend to build, provide the plans (location, cross sections, ground plan, layout) for the establishment, and the specifications for their operations (listing products they intend to make, slaughter speed and capacity, temperatures of air-conditioned environments and other information).

The FSIS auditor verified that an in-plant official veterinarian (OV) conducts ante-mortem inspection on the day of slaughter by reviewing the incoming registration and identification documents including Animal Movement Permits (GTA) and Animal Identification Documents

(DIA). In accordance with procedures outlined in the SRT, the OV's observe all animals at rest and in motion from both sides in designated holding pens in order to determine whether they were fit for slaughter. Each establishment has a designated observation pen for further examination of suspect animals. The FSIS auditor observed and verified that all animals have access to water in all holding pens (including the pens used for suspect animals), and that if animals are held overnight, feed and water are provided. The implementation of ante-mortem inspection is in compliance with Brazil's RIISPOA, *Title VII-Chapter I-Ante-mortem Inspection*, which FSIS has determined to be equivalent. The FSIS auditor further verified through onsite record review, interviews, and observations that the CCA's requirements concerning ante-mortem and humane handling/slaughter of livestock are being met in all audited slaughter establishments.

- During interviews held at the SIPOA office in Sao Paulo, the auditor was informed by inspection officials that the DIPOA does not provide local inspection officials with mechanisms to target testing of animals suspected of presenting violative residue levels at ante-mortem. Furthermore, it was described that, in the event that the local inspection should take the initiative to conduct such testing, the results of this test would not be considered "official" (i.e., with possible enforcement follow-up on the farms), as it was conducted outside the scope of the national residue monitoring program (PNCRC). However, when the preliminary findings were presented at the audit exit meeting in Brasilia, the representatives of the higher echelons of the CCA indicated instructions to conduct targeted testing have been issued, and that any samples collected would be treated in an official capacity. In light of this conflicting information, FSIS asks DIPOA to provide additional information clarifying this matter, as well as a description of measures were within the inspection system to raise the awareness of these provisions, so as to ensure their uniform implementation.

FSIS assessed post-mortem inspection examinations through onsite record review, interviews, and observations of inspection activities in all audited slaughter establishments. The FSIS auditor observed and verified that proper presentation, identification, examination, and disposition of carcasses and parts are being implemented. Both in-plant veterinary and non-veterinary inspectors are adequately trained in performing their on-line post-mortem inspection duties. The FSIS auditor observed the performance of the inspection personnel examining the heads, viscera, and carcasses in which the proper incision, observation, and palpation of required organs and lymph nodes are made in accordance with Brazil's Federal Inspection Service (RIISPOA), Title VII, Chapter III-Post-mortem Inspection, which FSIS has determined to be equivalent.

FSIS verified that documented periodic supervisory reviews are performed as required by 9 CFR 327.2(a) (2) (iv) (A). These reports were reviewed at the SIPOA offices in Cuiabá and Sao Paulo, in addition to, the local inspection offices at all audited establishments. In all locations, the supervisory reviews were conducted using a standard form, *Relatorio De Supervisao*, which consists of a detailed checklist with two main parts. The first part (*Programa De Autocontrole*) consists of sections for evaluating the adequacy of establishment food safety systems, including items related to inspection verification of Sanitation Performance Standards (SPS) elements, Sanitation Standard Operating Procedures (SSOP), HACCP, and microbiological control (i.e., generic *Escherichia coli* (*E. coli*), *Salmonella*, and *Enterobacteriaceae*). The second part (*Relatorio De Avaliacao das Atividades de Inspecao*) consists of questions for evaluating the

knowledge, skills, and abilities of inspection personnel to conduct assigned responsibilities at the United States -eligible establishments.

- At one establishment, periodic supervisory reviews were not conducted at the intended frequency. During the period ranging from January to August 2014, only three supervisory reviews (March, May, and August) were conducted at this establishment. The instructions contained in Official Circular Number 27 /2009/DIPOA prescribe a bi-monthly frequency for these reviews, for which a minimum of four supervisory visits should have been conducted within this 8-month period. However, the conditions of the establishment on the day of the audit indicated no observed effect on the ability for the system to maintain equivalent standards.

Within Brazil's inspection system, the principal documents governing the export of thermally processed commercially sterile product include:

- Articles 377 to 392 of RIISPOA
- Circular DICAR no. 28/1978: *Production control of preserved food in establishments approved for export to the United States of America*
- Circular no. 362/2013/CGPE/DIPOA: *Guidelines to carry out the inspection procedures to assess the process control during the elaboration of low acidity canned food, Beef Jerky, and Cooked and Frozen Food*
- Circular no. 285/2005/CGPE/DIPOA - Procedures for incubation of samples of stable meat products subjected to commercial sterilization.
- Normative Instruction no. 83/2003, Appendix I: *Technical Regulations of Identity and Quality for Canned Beef (Corned Beef)*

Circular DICAR Number 28/1978 requires that all the thermal process applications be submitted to the state offices (e.g., SIPOA/SISA) for technical analysis to ensure that the performance standard of a 12-log reduction (12D) for *Clostridium botulinum* is met. This review also ensures that the process schedules submitted by exporting establishments have sufficiently addressed the aspects for commercial sterility of the product. Commercial sterility is further ensured through the implementation of Circular no. 285/2005/CGPE/DIPOA, which instructs local SIF inspection officials to collect samples at a rate of 0.1 percent (1/1000) for incubation.

While on-site, the auditor verified that the process schedules for products exported to the United States were appropriately reviewed by the state offices, that they were on file at local SIF inspection offices, and that the requirements for incubation were met.

FSIS' SRT review of RIISPOA indicated that the second paragraph of Article 379 permits the use of lead (Pb) in solder seams for canned product. The use of lead in solder seams has been prohibited in the United States since 1995. While on-site, the auditor verified that none of the establishments audited were using cans containing lead. However, as the use of cans which contain Pb is legally permitted in Brazil, DIPOA will need to update its requirements related to United States export to ensure that this does not occur. These changes should be communicated within 60 days of receipt of the audit report in order for FSIS to consider Brazil's system governing the export of thermally processed commercially sterile product to continue to be equivalent.

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

VI. COMPONENT THREE: SANITATION

The third of the six equivalence components that the FSIS auditor reviewed was Sanitation. To be considered equivalent to FSIS’ program, the CCA must provide general requirements for sanitation, sanitary handling of products, and SSOP. The CCA has compiled specific sanitation requirements related to United States export Circular Number 175/2005/CGPE/DIPOA, “*Verification Procedures for the Self-inspection Programs.*”

The FSIS auditor reviewed sanitation plans and records related to the design and implementation of sanitation programs at all of the audited establishments. In one of the audited establishments, the FSIS auditor verified the actual pre-operational inspection by shadowing and observing the in-plant inspector conducting pre-operational sanitation verification of slaughter and processing areas. The in-plant inspection personnel’s hands-on verification procedures begin after the establishment personnel conducted their pre-operational sanitation and determined that the facility is ready for in-plant inspector pre-operational sanitation verification activities. The in-plant inspection personnel conduct this activity in accordance with the CCA’s established procedures.

The FSIS auditor 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.

Findings related to the enforcement of elementary aspects of SPS were identified in four of the five establishments visited. The most common finding related to verification of SPS standards by inspection personnel involved facility lighting. For example, in one establishment, several lighting non-compliances were noted. One inspection station did not meet the requirement of 540 lux. In addition, many of the carcass transit areas did not meet the requirement of 110 lux.

In addition, the following findings were related to other elements of sanitary performance standards for establishment operations:

- In one establishment, employees were observed entering restrooms with their work uniforms, without additional measures to protect the surfaces of these uniforms so as to minimize potential product contamination (e.g., use of protective covering in the restrooms, or in the production areas).
- In one establishment, the floor of the raw material receiving area for thermally processed product presented numerous cracks and fissures that would render it difficult to clean and lead to the potential creation of insanitary conditions.
- In one establishment, a section of dead-end pipe was observed in one of the processing areas.
- In one establishment, a partially-filled cooking bag which bore the mark of inspection was inappropriately disposed of in a container used for inedible materials. In order to avoid the potential loss of identity of condemned materials, the meat should have been removed from the cooking bag prior to disposal.

In one establishment, several crates used to store raw materials for the production of cooked beef were observed with exposed product. The plastic liners were broken, and the product was touching the metal bars of these crates (not considered a product contact surface). Upon the auditor's identification of the issue, the local inspection personnel directed the establishment to take immediate corrective action by isolating and disposing of the exposed product and committing to using double liners in all future crates until a definitive solution could be reached (e.g., purchasing of thicker linings, modification of crates to avoid puncturing of liners). In response to this finding, FSIS requests that DIPOA provide specific information regarding its assessment of the effectiveness of long-term corrective actions proposed by the establishment.

The FSIS auditor determined that the CCA's inspection system continues to provide sanitation requirements equivalent to those of the United States' system. In-plant veterinary officials and state supervisors demonstrated an overall ability to verify the ability of establishments to maintain sanitary conditions, although there is a need to better enforce sanitation performance standards (especially facility lighting). While one case of product contamination was identified, the FSIS auditor indicated that this was an isolated incident because of the manner in which this non-compliance was addressed in the remaining areas of this facility and other establishments approved for United States export.

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

VII. COMPONENT FOUR: HACCP SYSTEMS

The fourth of the six equivalence components that the FSIS auditor reviewed was HACCP. The inspection system must require that each official establishment develop, implement, and maintain a HACCP plan; and verify the effectiveness of processes and process controls.

Brazil's meat inspection system has codified FSIS' HACCP regulatory requirements prescribed in 9 CFR Part 417 in Circular Number 175/2005/CGE/DIPOA, which addresses the evaluation of written HACCP programs, monitoring, verification, corrective actions, record keeping, and hands-on verification inspection.

The FSIS auditor verified through record review and observation that the in-plant inspection personnel at certified establishments conducted daily verification of HACCP plans, for which verification results are entered on Form 01/Análise de Perigos e Pontos Críticos de Controle (APPCC). The in-plant inspection personnel verification of HACCP plans includes verification of Critical Control Point (CCP) for all production shifts.

At three slaughter establishments audited, the FSIS auditor conducted an onsite review of the zero tolerance (feces, ingesta, and milk) CCP records generated during the past year. In addition, the FSIS auditor reviewed the in-plant inspection's associated zero tolerance verification records (Form 02/APPCC) at these locations. All establishments audited were conducting 100 percent monitoring of carcasses for this CCP. The review of the establishment's corrective actions in response to the few observed deviations from the zero tolerance critical limit indicated that all four parts of the corrective actions were correctly addressed, in accordance with section 14.2.V of Circular Number 175/2005/CGE/DIPOA. Furthermore, the FSIS auditor confirmed that the

physical CCP monitoring location for government verification was before the final wash in all establishments audited.

At establishments producing frozen cooked beef and beef jerky, the auditor reviewed the HACCP programs for these processes with a special emphasis on lethality for *Salmonella* and other relevant pathogens. For frozen cooked beef, the auditor observed that all establishments had a CCP in place in order to meet Brazilian Ordinance No. 711/1995, which requires a minimum internal temperature of +71°C (159.8 °F) for cooked meat products. In the two audited facilities that were producing beef jerky, the establishments had adopted the recommendations included in the *FSIS Compliance Guideline for Meat and Poultry Jerky* and included appropriate measures to address lethality: relative humidity within the cooking cycle, cooking temperature, and water activity. The auditor also reviewed the validation documents at these establishments, which indicated that the actual lethality achieved by these processes far exceeded the minimum five-log reduction for *Salmonella* prescribed in the aforementioned FSIS guidelines.

As a follow-up to the previous year's audit findings, the auditor verified that establishments approved for export to the United States have reviewed their SRM control programs to include: brain, skull, eyes, trigeminal ganglion, spinal cord, spinal ganglia roots, spinal column (excluding the caudal vertebrae, the transversal processes of the thoracic and lumbar vertebrae and sacral wings) of bovines 30 months of age and older, and the tonsils and the distal portion of the ileum for bovines of all ages. On August 15, 2014, Brazil published additional clarifying instructions (Circular Number 622), increasing the minimum portion of the distal ileum that should be removed from 70 cm to 203.2 cm (80 inches), in order to maintain equivalence with the United States domestic program. The auditor noted that all establishment and inspection personnel were familiar with the contents of this recently issued Circular and were following its instructions accordingly.

The FSIS auditor found in the establishments that he visited that DIPOA requires removal only of the palatine tonsils and not the lingual tonsils within their prescribed measures for SRM control in beef slaughter establishments. In the United States, FSIS requires that both the palatine and lingual tonsils be removed because infectivity with the BSE agent has been demonstrated in these tissues. The auditor also observed that DIPOA does not routinely require establishments to institute measures to prevent SRM cross-contamination with non-SRM material associated with the knock-hole of cattle 30 months of age and older (e.g., prevent leakage of brain tissue during head washing, which occurs in high-pressure cabinets). Cattle less than 30 months of age are slaughtered in the same facilities as are cattle 30 months of age and older. During the audit, one establishment was using a non-penetrating captive bolt, for which this was not an issue (FSIS voices no preference over one stunning method or another).

FSIS' assessment of the significance of these findings is based on the following: 1) Beef tongues and meat derived from heads are not currently imported from Brazil (neither whole, in part, nor included in product formulation). 2) DIPOA exercises control over these products through its establishment approval process. No establishments under the SIF system are eligible to export tongues or "industrial meat" (identified by DIPOA as *carne industriale*, which includes head meat) to the United States. 3) The USDA Animal and Plant Inspection Agency (APHIS), based on the classification of the World Organization for Animal Health (OIE), consider Brazil to be a "negligible risk" country for Bovine Spongiform Encephalopathy (BSE). Consequently, FSIS

concluded that sufficient controls are in place to ensure that lingual tonsils will not be in products exported from Brazil to the United States.

The FSIS auditor identified the following additional HACCP-related non-compliances that should have been previously identified by local inspection personnel, or during periodic supervisory reviews:

- At one establishment, the hazard analysis addressing the production of dried beef did not accurately identify the potential hazards associated with the stabilization of product. This document did not address the possible germination and subsequent toxin production of spore-forming organisms such as *Clostridium perfringens*. As there is a CCP in place to ensure that the final product presents a water-activity inferior to 0.82, it is unlikely that conditions would allow for toxins from these organisms to be produced. However, failure to address all possible hazards at this step does not meet the regulatory requirements of section 14 of Brazilian regulation Number 175/2005/CGPE/DIPOA.
- At one establishment, records documenting the monitoring of the three-prong CCP (oven temperature, relative humidity, and product temperature) related to the production of beef jerky did not include the time the event occurred.

HACCP Controls for Avermectins in SIF Establishments Certified for United States Export

FSIS auditors noted that SIF establishments rely significantly on the effective implementation of the national residue monitoring program within the context of their HACCP systems in order to ensure that product is free from chemical residues. Examples of this reliance included reference to the PNCRC in the hazard analysis and reference to the PNCRC in supplier letters of guarantee.

Nevertheless, it was noted that in many cases establishments instituted additional controls outside of the PNCRC. While some of these controls were voluntary, many of them were put in place to meet the mandatory requirements instituted by the CCA, in accordance with the following issuances:

- Circular No 017/2010/DIPOA: *Audits for the evaluation of the reassessment and revalidation of the HACCP Plans;*
- Circular No 018/2010/DIPOA: *Criteria to be used during the audits for the evaluation of the reassessment and revalidation of the HACCP Plans;*
- Circular No 021/2010/DIPOA: *Guidelines for the validation of the CCP limits of the HACCP Plans and the CPs, of the pre-requisite programs;*
- Circular No 022/2010/DIPOA: *Official Program of Avermectin Analysis;*
- Circular No 127/2010/CHC/CGPE/DIPOA: *Use of process control letters to assess the results of monitoring for ivermectin in cattle;*
- Circular No 139/2010/CHC/CGPE/DIPOA: *Ivermectin analyses in final product;*
- Circular No 198/2010/CHC/CGPE/DIPOA: *Review of Ivermectin in the final product;* and
- Normative Instruction No 13/2014: *Prohibition of the production, manipulation, fractioning, marketing, imports and use of avermectins of long duration*

What follows is an assessment of these controls based on audit evidence while on-site, and identified potential weaknesses in how government and industry interact to control the presence of chemical residues in products exported to the United States. This assessment was conducted from the following perspectives, based on *Federal Register*: November 28, 2000 (Volume 65, Number 229)

- Confirmation of producer history
- The purchase of animals that are free of chemical residues
- Animal identification
- Communication between government and industry
- Notification of violative results to suppliers

Confirmation of producer history

All audited establishments maintained lists to identify previous violators to ensure that animals received from these individuals would not be used in association with United States export. While these lists were shared between establishments belonging to the same corporate group, Brazilian law prohibits the public sharing of this information.

- Ultimately, this practice can impact the ability to identify chronic violators on a national level.

The purchase of animals that are free of chemical residues

In accordance with Circular No 017/2010/DIPOA, all audited slaughter establishments required letters of guarantee associated with receiving animals (as a CCP), indicating that withdrawal times had been respected, or that avermectins of long duration had not been used in accordance with per Normative Instruction No. 13 of this year (additional information regarding *Normative 13* is provided under section 8, *Chemical Residue Control Programs*).

In addition, each establishment maintained a list of prohibited compounds. All audited establishments maintained outreach programs with suppliers.

All slaughter establishments conducted ivermectin testing on each lot of animals received, in accordance with established frequencies outlined in the Brazilian sampling table NBR 5426/2005. At two facilities, the testing frequency for animals from the state of Sao Paulo had been recently increased, based on the historical analysis of animals arriving from that area.

In many cases, establishments were using ELISA for the testing of received animals (livers or muscle). Validation studies were available, which renders this method potentially acceptable within the context of establishment testing.

- However, FSIS would like to point out that ELISA is not considered an equivalent method to HPLC. DIPOA should continue to assess the accuracy of the results and any discrepancies related to finished product testing (including results obtained and communicated by FSIS at POE).

While the testing of animals (livers or muscle) was typically conducted as a control point (CP) rather than a critical control point (CCP), this distinction seems to have little practical difference in that all four parts of (HACCP) corrective actions were taken in response to each violative result and documented.

- However, it is important to reiterate that FSIS considers avermectin levels that exceed the current tolerances established by the FDA as a food safety issue, and not simply an export requirement. This is particularly true when establishments are testing muscle, for which there is no maximum residue level (MRL) under Brazilian law. Consequently, DIPOA's verification activities should focus on the establishment's ability to control food safety hazards of chemical origin, considering the results of establishment testing where appropriate.

On-site audits by the establishment are conducted on farms that present violative lots and require a successful outcome prior to regaining eligibility to supply animals for the United States market. This process typically takes a minimum of 6 months to complete.

In addition, establishments conducted ongoing farm visits (audits and outreach) even in the absence of violative results. One audited establishment had conducted audits for a majority of farms from which it receives live animals. However, another company (with multiple certified establishments) had only audited approximately 950 of the 15,000 suppliers (with an average of about 600 visits per year).

In accordance with Circulars 139 and 198 CHC/CGPE/DIPOA of 2010, all establishments audited were subjecting finished product to HPLC/UPLC testing, during which product is held until results are received (i.e., hold and test). This included:

1. Government-mandated testing at approved laboratories (observed at all audited establishments)
2. Company internal testing (observed at some audited establishments, which may also be accompanied by testing of livers from slaughtered animals)
 - However, there is little government verification that accurate results are obtained by the establishments. While it was described that establishments were expected to use a validated HPLC method, the procedures or parameters by which to make this determination were not provided.

Animal identification

All audited slaughter establishments maintained records sufficient to conduct accurate trace-back and trace-forward activities. During audit, establishments demonstrated the ability to segregate product lots that exceed established MRLs from United States export.

Communication between government and industry

As indicated previously, establishments routinely generate the following information, which is available for review by inspection officials. Examples include: slaughter testing results, results of final product testing, violator lists, and results of onsite audits conducted by the establishments.

- However, DIPOA makes little use of this information as it relates to implementation of its national residue control program or exploratory program for residues (e.g., targeting of violators identified by the establishments, ante-mortem).

Notification of violative results to suppliers

All establishments presented procedures to notify suppliers of violative samples. This included the use of either tracked emails or registered mail. Educational outreach materials are also routinely included in these communications.

Conclusion

The results of the pre-audit document analysis and onsite audit verification of the HACCP component indicate that the CCA continues to meet FSIS equivalence for this component. While it is important for the CCA to address the identified recordkeeping non-compliances in order to meet the applicable requirements, it is unlikely that they would result in the production of unsafe product. Regarding the control of chemical hazards (ivermectins), the audit evidence indicates that establishments have adopted a proactive approach to address these hazards and are complying with the requirements related to United States-export imposed by the CCA. However, the audit did identify some weaknesses in government verification in this area, particularly related to the verification of testing methodologies and results within the establishment's HACCP system.

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

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE 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 carries out effective regulatory activities to prevent chemical residue contamination of food products. To be considered equivalent to FSIS' residue control program, the CCA's program needs to include random sampling of internal organs, fat, and muscle from carcasses for chemical residues identified by the exporting countries and FSIS as potential contaminants. In addition, the CCA needs to identify the laws, regulations, or other decrees that serve as the legal authority for the implementation of the program; provide a description of its residue sampling and testing plan and the process used to design the plan; describe the actual operation of its residue plan and actions taken to deal with unsafe residues as they occur; and provide oversight of laboratory capabilities and analytical methodologies to ensure the validity and reliability of test data.

The Brazilian National Plan for Control of Residues in Products of Animal Origin – (PNCRC), was established by Ministerial Decree n° 51, on May 6, 1986, and by appropriate Ministerial Decree n° 527, of August 15, 1995. The PNCRC has the control and surveillance of products as its basic regulatory function. Its actions are aimed at understanding and preventing the violation of safety standards or MRLs for allowed substances and the occurrence of residues and chemicals banned for use in the country at all levels. For this purpose, samples are collected from live and slaughtered animals and industrialized food products destined for human consumption originating from the establishments under federal inspection (SIF).

Within the PNCRC, subprograms that are of particular interest to FSIS include:

1. *Subprogram for Monitoring*: aims at generating information on the frequency, level, and distribution of residues in the country, over time. The types of residues to be researched

are selected based on potential risk and availability of analytical methodology appropriate to the goals of the monitoring being performed. The number of samples, the maximum residue limit, the methodology analysis, the matrices and the drugs being analyzed, and the official and accredited laboratories are included in the annual schedule. This subprogram does not require that product be held until sample results are received (except in response to follow-up testing, as described below).

To control avermectin, the subprogram for monitoring extends to all establishments slaughtering cattle at SIF and adopts the limits and the target tissue (liver) of with an MRL of 100 parts-per-billion (ppb). This value has been adopted legally within Brazil and is consistent with the MRL previously established by the United States Food and Drug Administration (FDA).

2. *Subprogram for Exploration*: developed in special situations (e.g., in relation to United States export) to generate information about the frequency and levels where substance residues occur in Brazil. To control avermectins in the exploratory subprogram for the USA, DIPOA determines eligibility for export based on FDA's previously established MRLs for avermectins, which includes 10 ppb in muscle for ivermectin and abamectin. Under this subprogram, samples are held until test results are received.

An important point of distinction between the two subprograms is type of enforcement actions that may be taken under Brazilian law.

1. Within the subprogram for monitoring, livers from cattle with avermectin levels exceeding 100 ppb result in a "Notice of Violation," which initiates official actions across different governmental bodies in accordance with Ordinance # 396 of November 23, 2009, and Official SDA/MAPA 132/2012. This includes:
 - Investigation of the farm involved in the violation. The investigation includes an on-site visit, document review, and interviews. This investigation may be extended to neighboring properties or other farms associated with the violative lot. The investigation may be extended also to surrounding industries (feed, veterinary drugs, etc.).
 - Development of a corrective action plan (including preventive measures) by the SIF establishment. The state inspection office is responsible for the collection of samples of the next batches of animals/production from the farm involved in the infringement directed to slaughter/processing until the farm reaches five (5) consecutive conforming lots. The products obtained from these lots are retained in the SIF until the results of analysis are known. In case of non-conforming results, the products are destroyed.
 - Withholding of animal movement permits (GTAs) from the farm in question for a period of 6 months (for illegal drugs), or throughout the withdrawal period (for authorized drugs). Subsequent GTAs are marked "PNCRC," until five consecutive conforming lots of animals are received. The purpose of this identification is to guide the collection of investigation samples by inspection personnel after the withholding period.

2. Within the subprogram for exploration established for the United States, muscle from cattle with ivermectin or abamectin levels exceeding 10 ppb do not result in a "Notice of Violation" to the farm of origin, since MRLs for these compounds in the given matrix have not been legally established in Brazil. Memorandum No. 306/2013 / GAB / DIPOA of 27 12 2013 delineates actions to be taken when these values are exceeded. In this case, the state agency (e.g., SIPOA) simply requires the SIF establishment to conduct a documented investigation identifying the cause of the violation and institute corrective actions (including measures to prevent recurrence).
 - FSIS understands the difficulties associated with conducting on-farm enforcement of MRLs that are established by the importing country for which there is no corresponding Brazilian counterpart. However, it is reasonable to expect that information gathered from the government subprogram for exploration or establishment testing for muscle exceeding FDA's MRL could ultimately be used to conduct additional follow-up activities within the inspection system (e.g., targeted sampling of farms testing positive), rather than relying predominately on activities conducted by industry.

On May 30, 2014, the Brazilian Minister of Agriculture published Normative Instruction #13, which prohibits the production, manipulation, fractioning, marketing, import, and use of avermectins of long duration for veterinary use. While on-site, FSIS gathered further information regarding the use of the term "long duration." The auditor was provided with a copy of Circular no. 001/2014/CPV/DFIP/SDA, which identifies these compounds as follows:

- Products containing ivermectin, abamectin, doramectin, or moxidectin at a concentration greater than one percent.
- Products containing ivermectin, abamectin, doramectin, or moxidectin at a concentration of up to one percent, marketed as being of "long duration."
- Products containing ivermectin, abamectin, doramectin, or moxidectin at a concentration of up to one percent, with a withdrawal period greater than 35 days.

During visits to establishments, laboratories, and government offices, the interviews held with inspection officials indicated that they were familiar with the requirements of these documents. Likewise, all audited establishments maintained lists of anti-parasitic agents, which would be considered prohibited based on the definitions provided in the above Circular. These lists were then cross-referenced with the information provided in supplier letters of guarantee, as part of the control within their HACCP systems.

FSIS audit verification activities of Brazil's chemical residue testing program indicated that the CCA continues to demonstrate the ability to meet the equivalence requirements for the Chemical Residue Control component, although weaknesses in the program were identified. Findings that may impact DIPOA's ability to effectively control the presence of chemical hazards in meat have been described in previous sections of the report and include: the timely propagation of information related to POE violations identified by FSIS throughout its inspection system, information regarding the targeting of animals suspected of violative drug residues at ante-mortem, and the review of establishment information generated under their HACCP systems for chemical (avermectin) hazard control (e.g., chronic violator lists, and establishment testing

results). These above weaknesses prevent use of all available data streams within Brazil's ongoing assessment of the PNCRC.

The residue violations identified at United States POE for ivermectin have required FSIS to conduct additional activities outside the context of the on-site audit, to ensure that that meat products originating from Brazil are safe. On June 6, 2014, FSIS began refusing the import of frozen cooked beef from one establishment based on the lack of information provided by the DIPOA in response to FSIS' notification of ivermectin violations identified at POE. U.S. FDA approved a change of the MRL for ivermectin in cattle on August 13, 2014. As part of this change, the MRL for ivermectin in the muscle of cattle has increased from 10 ppb to 650 ppb. An historical analysis of prior POE rejections for ivermectin indicated that none came within the proximity of 650 ppb, thereby rendering future violations unlikely. However, the violations identified by FSIS at POE prior to this change in MRL represent an opportunity for Brazil to improve its system in association with the above findings to demonstrate that it is able to enforce controls within established parameters.

The analysis and on-site verification activities indicate that the CCA continues to maintain equivalence and is operating at an "adequate" level 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, and meet all equivalence criteria.

The evaluation of this component included a review and analysis of the CCA's Circular No 175/2005/CGPE/DIPOA, "*Verification Procedures for the Self-inspection Programs,*" previously submitted by the CCA as support for the responses provided in the SRT. This circular describes the official inspection methodology for a continuous and systematic assessment of inspection activities during routine verifications of microbiological tests, including *Enterobacteriaceae*, *Salmonella* spp., generic *E. coli*, and *Listeria monocytogenes (Lm)* in RTE products. Although there is no explicit requirement with Brazil's inspection system for product to be held in association with government testing, the auditor noted that this was a common practice at the establishments audited.

The CCA has a *Salmonella* testing program for chilled livestock (cattle and swine) carcass sampling that is consistent with the FSIS *Salmonella* Performance standards in 9 CFR 310.25(b). The CCA requires that one *Salmonella* set be scheduled per year that consists of 82 samples from beef (55 samples from swine) carcasses with one positive sample considered acceptable from beef (up to six in swine), and two positive samples considered a set failure. Establishment failing the first *Salmonella* set must take immediate corrective action and reassess its HACCP plan, after which second set of samples is collected. If the establishment fails to meet the performance standard on the second sample set, then the HACCP plan is audited by the Brazilian inspection service, and another sample set is collected. If an establishment fails three consecutive sample sets, it is removed from the list of establishments eligible to export to the United States. The suspension would remain in effect until the establishment achieves the

performance standard set based on number of samples tested (n) and maximum number of positives to achieve standard (c). The CCA's *Salmonella* performance standard for bovine (n = 82, c ≤ 1) and swine (n = 55, c ≤ 6) is the same as FSIS' standards.

As indicated previously, Brazil's equivalence determination for *Salmonella* requires the following activities:

- Establishment employees collect the samples
- Private laboratories analyze samples

In order to ensure that the food safety measures and objectives associated with this equivalence determination continue to be met, the FSIS auditor verified the following aspects related to the implementation of this program, for which no concerns were identified:

- DIPOA schedules each sample series. The state inspection offices (e.g., SIPOA) are responsible for informing local inspection personnel at SIF establishments when sampling is to begin/end and for monitoring of the results.
- SIF inspection personnel randomly select carcasses on the morning the sample is to be collected, with no prior notification to the establishment.
- SIF inspection personnel observe the collection of *each sample* taken by establishment personnel, as well as measures related to sample integrity and security (i.e., application of security seals to the mailing container).
- Private laboratories must be approved by DIPOA and are audited twice per year by CGAL. Approved laboratories currently use FSIS MLG methods for *Salmonella* analysis.

However, the following findings related to CGAL's oversight of microbiological laboratories were identified as it pertains to *Salmonella* testing:

- DIPOA does not require intra-laboratory proficiency testing, which is specifically required for analytical methods related to United States export. At the microbiological lab which was audited, intra-laboratory proficiency testing was conducted exclusively for the ISO 6579:2002 method of detection for *Salmonella* spp. The method used for the detection of *Salmonella* spp. in association with export to the United States (MLG 4.08) was not included as part of the intra-laboratory proficiency program.
- At two establishments audited, a review of *Salmonella* spp. carcass testing results indicated that the government-approved laboratory was using an outdated method, rather than the updated MLG 4.08 expected by the Ministry of Agriculture's division for CGAL.

An offsite assessment of the non-conformities conducted in conjunction with FSIS' Office of Public Health and Science (OPHS) concluded that, while the deficiencies do not represent an immediate risk to public health, they can ultimately compromise the accuracy of test results.

The CCA conducts verification activities that monitor an establishment's generic *E. coli* testing program in chilled livestock carcasses. The testing program complies with FSIS equivalence criteria and is outlined in the CCA's Circulars 835/CGPE/DIPOA/2006 and 1058/CGPE/DIPOA/2008. While on-site at three establishments, the FSIS auditor verified that the

responsible individuals have the knowledge and skills to implement this type of testing on an ongoing basis. Similarly, both the establishment and inspection personnel are familiar with the upper and lower control limits, as well as the correct actions to be taken when the upper limits are exceeded. However, no such loss of process control was identified in the on-site documents reviewed for this year.

The CCA has a verification-testing program in place to test for *Lm* and *Salmonella* species in RTE products that are eligible to be exported to the United States. Furthermore, the CCA requires that establishments exporting RTE products to the United States have a program in place to meet FSIS equivalence criteria for control of *Lm*. In addition to product testing, establishments are required to take five samples (three FCS, and two NFCS) per production line per week. All samples are collected under observation by inspection personnel and sent in a secured package to a CGAL-approved laboratory for analysis. Sample sponges are collected using a 30x30 cm template, and analyzed using the current FSIS MLG method (MLG 8.09).

Because of the current APHIS restrictions for Foot and Mouth Disease (FMD) in the majority of the country, Brazil does not export raw beef to the United States. If changes in Brazil's disease status render the export of raw beef more practical, FSIS will require DIPOA to submit an equivalent STEC control program prior to permitting import of this type of product.

FSIS concludes that, based on the results of the overall microbiological component assessment, the CCA continues to meet the core equivalence requirements for this component. An analysis of the identified findings indicates that they are unlikely to have a significant impact on the CCA's ability to ensure the export of safe product.

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

X. CONCLUSION AND NEXT STEPS

The 2014 audit results indicate that the Central Competent Authority (CCA)'s food safety inspection system is performing at an "adequate" level meeting the core criteria for all six equivalence components. FSIS identified operational (or procedural) weaknesses related to Statutory Authority and Food-Safety Regulations for targeting of animals suspected of presenting violative residue levels at ante-mortem; Government Chemical Residue Control Program showing weakness with the CCA national residue monitoring program.

In addition, an analysis of the other observations within each component did not identify any systemic deficiencies which represented an immediate threat to public health. However, as the ability of the inspection system to ensure export of product that is safe, unadulterated, and properly labeled can be compromised if left unchecked, FSIS requests that CCA provide a detailed response for each of the identified findings within 60 calendar days of receipt of this report.

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

APPENDICES

Appendix A: Individual Foreign Establishment Audit Checklists

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Ferreira International Ltda. Tres Rios (Rio de Janeiro)	2. AUDIT DATE 9/19/2014	3. ESTABLISHMENT NO. SIF 13	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Alexander L. Lauro		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Est.#: SIF 13

City and Country: Tres Rios, Brazil

Date: 9/19/2014

The following non-compliances were not identified by Brazilian inspection officials during the establishment review:

15/51. The hazard analysis addressing the production of dried beef did not accurately identify the potential hazards associated with the stabilization of product. This document did not address the possible germination and subsequent toxin production of spore forming organisms such as *Clostridium perfringens* after the cooking/drying phase. As there is a CCP in place to ensure that the final product presents a water-activity inferior to 0.82, it is unlikely that conditions would allow for toxins from these organisms to be produced. However, failure to address all possible hazards at this step does not meet the regulatory requirements of section 14 of Brazilian regulation No. 175/2005/CGPE/DIPOA.

In addition, the FSIS auditor noted the following findings related to the implementation of Brazil's inspection system:

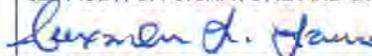
36. The establishment was incorrectly registered and approved by DIPOA for processes it no longer maintained the necessary equipment to conduct, including thermal processing and the production of frozen cooked beef. This is not in accordance with Articles 20 to 76 of Brazil's *Regulations for the Inspection of Industrial Sanitation for Products of Animal Origin* (RIISPOA), which require that the Federal Inspection Service maintain an accurate listing of products for all registered establishments.

57. Periodic supervisory reviews were not conducted at the intended frequency. During the period ranging from January to August 2014, only three supervisory reviews (March, May, and August) were conducted at this establishment. The instructions contained in *Official Circular No 27 /2009/DIPOA* prescribe a bi-monthly frequency for these reviews, for which a minimum of four supervisory visits should have been conducted within this eight month period.

61. NAME OF AUDITOR

Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE

 9/19/2014

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Pampeano Alimentos S/A Hulha Negra (Rio Grande do Sul)	2. AUDIT DATE 10/1/2014	3. ESTABLISHMENT NO. SIF 226	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Dr. Alexander L. Lauro		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Est.#: SIF 226

City and Country: Hulha Negra (Rio Grande do Sul), Brazil

Date: 10/1/2014

The following non-compliances were not identified by Brazilian inspection officials during the establishment review:

16/51. Establishment records documenting the monitoring of the three-prong CCP (oven temperature, relative humidity, and product temperature) related to the production of beef jerky did not include the time which each entry occurred [Section 14 of Brazilian regulation No. 175/2005/CGPE/DIPOA].

61. NAME OF AUDITOR

Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE



10/1/2014

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION JBS S/A Lins (Sao Paulo)	2. AUDIT DATE 9/25/2014	3. ESTABLISHMENT NO. SIF 337	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Dr. Alexander L. Lauro		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Est.#: SIF 337
City and Country: Lins, Brazil
Date: 9/25/2014

The following non-compliances were not identified by Brazilian inspection officials during the establishment review:

10/51. Several crates used to store raw materials for the production of cooked beef were observed with exposed product. The plastic liners were broken, and the product was touching the metal bars of these crates (not considered a product contact surface). Upon identification of the issue by the auditor, the establishment took immediate corrective action by isolating and disposing of the exposed product, and committed to using double liners in all future crates until a definitive solution could be reached (e.g., purchasing of thicker linings, modification of crates to avoid puncturing of liners) [section 10.2 of Brazilian regulation No. 175/2005/CGPE/DIPOA].

40/51. Several lighting non-compliances were noted. One inspection station did not meet the requirement of 540 lux. In addition, many of the carcass transit areas did not meet the requirement of 110 lux [section 3.c. of Brazilian regulation No. 175/2005/CGPE/DIPOA].

48/51. A cooking bag, partially-filled with raw meat and bearing the mark of inspection, was inappropriately disposed of in a container used for inedible materials. In order to avoid the potential loss of identity of condemned materials, the meat should have been removed from the cooking bag prior to disposal [section 10.1 of Brazilian regulation No. 175/2005/CGPE/DIPOA].

In addition, the FSIS auditor noted the following related to the implementation of Brazil's inspection system:

36. The establishment was incorrectly registered and approved by DIPOA for the production of dried beef, a process for which the establishment no longer maintained the necessary equipment to conduct. This is not in accordance with Articles 20 to 76 of Brazil's Regulations for the Inspection of Industrial Sanitation for Products of Animal Origin (RIISPOA), which require that the Federal Inspection Service maintain an accurate listing of products for all registered establishments. The last profile update for this establishment was in 2012.

58. While observing the removal of tonsils in association with the establishment's SRM control program, the auditor noted that this was limited only to those of the palatine area, and that lingual tonsils were not removed. In addition, the establishment did not institute measures to prevent leakage of brain tissue from the knock-hole of cattle during head washing, which occurs in high-pressure cabinets. As per the establishment's written program, all cattle are treated as if they are thirty months of age or older, for which brain tissue is considered SRM. Subsequent conversations with DIPOA inspection officials indicated that this was compliant with the Brazilian domestic requirements for SRM removal. Neither beef tongues, nor meat derived from the head are currently exported to the U.S. from Brazil (neither whole, in part, nor included in product formulation).

59. A review of *Salmonella* spp. carcass testing for results indicated that the approved laboratory was using FSIS method MLG 4C.05, rather than the updated MLG 4.08 expected by the Ministry of Agriculture's division for General Coordination of Laboratory Support (CGAL).

61. NAME OF AUDITOR

Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE

 9/25/2014

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION JBS S/A Andradina (Sao Paulo)	2. AUDIT DATE 9/23/2014	3. ESTABLISHMENT NO. SIF 385	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Dr. Alexander L. Lauro		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Est.#: SIF 385

City and Country: Andradina, Brazil

Date: 9/23/2014

The following non-compliances were not identified by Brazilian inspection officials during the establishment review:

39/51. The floor of the raw material receiving area for thermally processed product presented numerous cracks and fissures which would render it difficult to clean, and lead to the potential creation of insanitary conditions (section 3.c. of Brazilian regulation No. 175/2005/CGPE/DIPOA).

40/51. The intensity of the lighting at the veterinary disposition station was below the required value of 540 lux (section 3.c. of Brazilian regulation No. 175/2005/CGPE/DIPOA).

42/51. A section of dead-end pipe was observed in one of the processing areas (section 3.c. of Brazilian regulation No. 175/2005/CGPE/DIPOA).

In addition, the FSIS auditor noted the related to the implementation of Brazil's inspection system:

58. While observing the removal of tonsils in association with the establishment's SRM control program, the auditor noted that this was limited only to those of the palatine area, and that lingual tonsils were not removed. In addition, the establishment did not institute measures to prevent leakage of brain tissue from the knock-hole of cattle during head washing, which occurs in high-pressure cabinets. As per the establishment's written program, all cattle are treated as if they are thirty months of age or older, for which brain tissue is considered SRM. Subsequent conversations with DIPOA inspection officials indicated that this was compliant with the Brazilian domestic requirements for SRM removal. Neither beef tongues, nor meat derived from the head are currently exported to the U.S. from Brazil (neither whole, in part, nor included in product formulation).

59. A review of *Salmonella* spp. carcass testing for results indicated that the approved laboratory was using FSIS method MLG 4.07, rather than the updated MLG 4.08 expected by the Ministry of Agriculture's division for General Coordination of Laboratory Support (CGAL).

61. NAME OF AUDITOR

Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE

 9/23/2014

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Marfrig Alimentos S/A Paranatinga (Mato Grosso)	2. AUDIT DATE 9/17/2014	3. ESTABLISHMENT NO. SIF 2500	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Alexander L. Lauro		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Est.#: SIF 2500

City and Country: Paranatinga, Brazil

Date: 9/17/2014

The following non-compliances were not identified by Brazilian inspection officials during the establishment review:

19/51. The establishment did not routinely include the time of entry for the element of records review within their HACCP verification procedures for the "zero-tolerance" (contamination by feces and ingesta) CCP [Section 14 of Brazilian regulation No. 175/2005/CGPE/DIPOA].

47/51. Establishment employees were observed entering restrooms with their work uniforms. No additional measures were observed to protect the surfaces of these uniforms so as to minimize potential product contamination (e.g., use of protective covering in the restrooms, or in the production areas). [Section 2 of Brazilian regulation No. 175/2005/CGPE/DIPOA].

In addition, the FSIS auditor noted the following related to the implementation of Brazil's inspection system:

58. While observing the removal of tonsils in association with the establishment's SRM control program, the auditor noted that this was limited only to those of the palatine area, and that lingual tonsils were not removed. Subsequent conversations with DIPOA inspection officials indicated that this was compliant with the Brazilian domestic requirements for SRM removal. Beef tongues are not currently imported to the U.S. from Brazil (neither whole, in part, nor included in product formulation).

61. NAME OF AUDITOR

Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE



9/17/2014

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



MINISTRY OF AGRICULTURE, LIVESTOCK AND FOOD SUPPLY
Secretariat of Animal and Plant Health - SDA
Department of Inspection of Animal Products - DIPOA

Letter no. /2015/GAB/DIPOA/SDA

Brasília, April 10th, 2015.

Dear Sir,

SHAUKAT H. SYED

Director – International Audit Staff

Office of Investigation, Enforcement and Audit

FSIS-USDA – Washington - United States

*Reference: **Brazil. 2014 Draft Final Audit Report – Comments from DIPOA/SDA/MAPA.***

Dear Mr. Syed,

1. I would like to greet you and express the respect I have for the *Food Safety and Inspection Service – United States Department of Agriculture* and make reference to your correspondence, dated February 10th, 2015, about the Draft Final Report of the Brazilian Meat Inspection System, which took place from September 14 through October 03, 2014.
2. The Department of Inspection of Animal Products – DIPOA, under the Secretariat of Animal and Plant Health of the Ministry of Agriculture, Livestock and Food Supply in Brazil – SDA/MAPA, hereby submits its comments to the aforementioned *Draft Final Audit Report*.
3. DIPOA would like to thank the opportunity to receive the comments contained in the Draft Final Audit Report, which will assist in the improvement of the Official Control System and also in self-control of enterprises. We stay at your entire disposal to clarify any doubts regarding to the FSIS-USDA 2014 Draft Final Audit Report.

Mr. Syed, please receive my wishes of esteem and consideration.

Best regards,

José Luis Ravagnani Vargas
Deputy Director of DIPOA/SDA/MAPA

Ministry of Agriculture, Livestock and Food Supply – MAPA
Secretariat of Animal and Plant Health – SDA
Department of Inspection of Animal Products – DIPOA



COMMENTS

**to the Draft Final Report of an audit of the FSIS-USDA
(which took place from Sept. 15 through Oct. 03, 2014)**

APRIL - 2015

INTRODUCTION

The FSIS-USDA held an audit in Brazil from September 15 through October 03, 2014 in order to verify if the Brazilian's Food Safety System (production of meat products) continues to be equivalent to that of the United States, that is: producing safe, wholesome, non-adulterated and properly labeled foods.

The FSIS-USDA audit was outlined to establish the equivalence of the Brazilian Meat Inspection System in six main components: 1) *Government Oversight*; 2) *Statutory Authority and Food Safety Regulations*; 3) *Sanitation*; 4) *Hazard Analysis and Critical Control Points (HACCP) Systems*; 5) *Chemical Residue Control Programs*; and 6) *Microbiological Testing Programs*. In addition to these components, the audit also emphasized the verification of corrective actions related to the findings of the 2013 audit (follow-up); the residue controls in response to violations identified at United States POEs and information provided by DIPOA via SRT regarding "Thermally processed commercially sterile products" and "RTE products".

The FSIS-USDA 2014 audit indicated that the Brazilian Inspection System is performing in an "adequate" level in maintaining its equivalence. However, the FSIS-USDA requires answers from DIPOA regarding the non-conformities found during such audit.

As requested, DIPOA is pleased to provide in this letter the answers regarding the non-conformities described in the FSIS Draft Final Report.

The documents cited in the answers and also the Action Plans and Corrective/Preventive Actions of the establishments audited by FSIS-USDA are attached to this letter.

DIPOA's official response to the 2014 FSIS-USDA Draft Final Audit Report

The Central Competent Authority (CCA) understood and accepted the need to address the following findings to maintain its equivalence.

Component 1: Government Oversight

The investigation procedures for international notifications are described in Memorandum no. 306/2013/GAB/DIPOA (copy attached). In the case of non-compliance with the time taken between the notification of the violation and the sending of said violation to the Federal Livestock Inspector responsible for the Federal Inspection service at the establishment, such occurrence was a result of non-receipt of the notification from the FSIS-USDA by the diplomatic means formally established within the scope of MAPA. All official notifications and documents received from other countries must be filed with the Secretary of International Relations – SRI/MAPA, and subsequently, that Secretary will direct the documents to the Departments/Coordinations responsible for handling of said issue.

With regard to the two establishments visited during the audit that did not have their qualifications for export of products updated with the FSIS-USDA, DIPOA provided the update of qualifications by way of Circular nos. 58 and 59/2015/CGPE/DIPOA (copies attached).

Component 2: Statutory Authority and Food Safety Regulations

With regard to the note of the absence or lack of knowledge on the part of the SIPOA Federal Livestock Inspectors about the possibility of collection of samples from lots of suspicious animals (in addition to the random monitoring, exploratory or investigation sampling by the PNCRC), for example, from suspicions raised in the *ante-mortem* inspection or the history of the property in company self-control, we inform that DIPOA, by way of item no. 2 in Circular no. 622/2014/CGPE/DIPOA (copy attached), established the control procedures for ivermectin residue in finished products destined for export to the United States.

Item no. 4 of SDA/MAPA no. 132/2012 (copy attached) establishes procedures for collection of samples from animals suspected of violation due to residue of veterinary drugs. The results of these samples, though outside the PNCRC plan, are considered official. In the case of the results of the analysis indicating the non-compliance of the sample, an Investigation Subprogram is commenced. The Federal Livestock Inspectors have the autonomy and legal authority to carry out collection of samples as long as they are handled within the official capacity of the Service.

As for the use of lead in the metallic alloy of the cans, we clarify that, although it is stated in the SRT that paragraph 2 of Art. 379 of the RIISPOA allows the use of lead and tin solder (as long as it does not come into contact with the interior of the receptacle), there is now Law no. 9832/99 (copy attached) in Brazil from September 14, 1999 that prohibits, throughout the nation, the industrial use of soldered metallic packaging with lead and tin alloys for packaging foodstuffs (except for dry or dehydrated goods). Therefore, pursuant to the Law, the use of metallic alloy containing lead in its composition is prohibited in Brazil for the packaging of foodstuffs.

Component 3: Sanitation

The non-conformities observed in this point are responded to in the Action Plans that are attached to this Letter.

Component 4: HACCP Systems

The non-conformities observed in this point are responded to in the Action Plans that are attached to this Letter. Also attached is CRHE Informational Bulletin no. 16/2015 containing the technical opinion from the Department of Animal Health (DSA/SDA), related to the withdrawal of Specified Risk Materials (MREs) during the animal slaughtering process. DIPOA will publish a directive for qualified establishments to meet the North American requirement. **RESPONSE IS MISSING THE TECHNICAL DISCUSSION WITH THE DSA.**

The ELISA tests mentioned refer exclusively to the tests carried out within the scope of the industry self-control programs and under their full responsibility with regard to the control of

animals received. From a merely analytical point of view, the ELISA technique can be considered sensitive and specific enough to identify the presence of ivermectin residue within the current tolerance or LMR levels established by American legislation. Taking this fact into consideration and that the said tests are carried out as screening, and especially considering that additional tests that use the HPLC-FL or LC-MS/MS technique are carried out in the muscle and end products, whether within the self-control environment or the PNCRC environment, we believe that a requirement for only the HPLC technique to be used in this specific point of control is not relevant. DIPOA is working to improve the critical analysis of the results obtained in the self-control measures of raw materials, comparing them with the results obtained in the self-control measures of the end products and the PNCRC. It is important to highlight that the DIPOA already carries out this critical analysis with regard to the communications of violation received from the POEs.

DIPOA and CGAL are currently working on the publication of a Normative Instruction that will improve the self-control measures that are the responsibility of the industries and that will establish the requirements for carrying out laboratory testing within the scope of these self-controls, so as to increase the effectivity of the governmental verification.

Component 5: Government Chemical Residue Control Programs

We consider the findings of this item met with regard to the LMR of 10ppb of ivermectin residue since the FDA decided to increase the LMR of ivermectin to 650ppb and DIPOA; despite this increase, it oriented the Federal Inspection Service to maintain the control on this new limit. Furthermore, with regard to the notifications of violations from the FSIS-USDA received in Brazil when the LMR of 10ppb was still in effect, we are informing that these have been responded to or are in the final phase of investigation.

Item no. 4 of Official Bulletin SDA/MAPA no. 132/2012 establishes procedures for sample collection from animals suspected of violation due to veterinary drug residue. The results of these samples, though outside the PNCRC plan, are considered official.

Many times the reference limits applied in the self-control programs at companies are less than the legal limits established in the PNCRC. Due to this, the non-conformities identified in the self-control programs do not always correspond to a PNCRC violation. However, per the

criteria of the Federal Livestock Inspector (FFA) responsible for the Federal Inspection Service (SIF) at the establishment, inspection samples can be collected and sent for analysis at any time and, in the case of violation, the FFA, in addition to the legal sanctions provided for, can request that an Investigation Subprogram is commenced.

Component 6: Government Microbiological Testing Programs

With regard to the note that DIPOA does not request intra-laboratory proficiency tests, we have to comment that the private laboratories that carry out the analyses of *Listeria spp.*, *Salmonella spp.* and *E. coli* in carcass swab samples will participate in proficiency tests using the MLG methodologies starting in 2015.

With regard to the observation that in two establishments audited they were using an outdated method for analyzing *Salmonella spp.*, we are informing that said laboratory was using the method recommended by CGAL and was duly updated. The issue was not just the name update of the method in their Quality Guarantee system registries.

Attachments

Memorandum no. 306/2013/GAB/DIPOA

Circular no. 58/2015/CGPE/DIPOA

Circular no. 59/2015/CGPE/DIPOA

Circular no. 622/2014/CGPE/DIPOA

Ofício [Official Bulletin] SDA/MAPA no. 132/2012

Lei [Law] nº 9.832/1999

Planos de Ação [Action Plans] – SIFs 385, 337, 13, 2500 e 226



MINISTRY OF AGRICULTURE, LIVESTOCK AND SUPPLY
Department of Agricultural Protection
Department of Inspection of Animal Products

Memorandum No. 306/2013/GAB/DIPOA

Brasilia, 27/12/2013

From the: Substitute Director of the DIPOA

A: General Coordination of Special Programs, General Inspection Coordination, regarding Divisions, SFAs ;
regarding DDAs, SIPOAs, SISAs and SIFISAs

With copy: CRC, CGAL, VIGIAGRO, SRI/MAPA.

Subject: International Notifications involving animal products and nonconformities detected by the PNCRC/
MAPA. Update of Procedures Manual

Dear sirs

Considering the need to improve the flow of information and internal communication and response with regard to international notifications involving animal products, we inform you that the DIPOA/SDA has undertaken a reorganization of procedures and activities relating to the management of this issue and has attached the update of the "Procedures Manual for the Treatment of International Notifications involving animal products and nonconformities identified by the National Waste and Contaminants Control Plan- PNCRC / MAPA.

This memorandum cancels and replaces Memorandum No. 134/2013/GAB/DIPOA of June 3rd, 2013 and its attachments.

Regards,

Leandro Diniz Antino Feijó
Fiscal Federal Agropecuario
Médico Veterinário CRMV/MG 6277
Diretor do DIPOA/SDA - Substituto

ATTACHMENT 01
PROCEDURE MANUAL FOR THE TREATMENT OF INTERNATIONAL NOTIFICATIONS
INVOLVING ANIMAL PRODUCTS AND NONCONFORMITIES IDENTIFIED
BY THE NATIONAL WASTE AND CONTAMINANTS CONTROL PLAN
- PNCRC/MAPA

1. BACKGROUND

International notifications involving animal products - POA and nonconformities within the PNCRC/MAPA were received and processed by the General Inspection Coordination - CGI/DIPOA through its respective Divisions, in accordance with Memorandum No. 134/2013/GAB/DIPOA of June 3rd, 2013.

Considering the reorganization of these activities in the Department, the Special Programs General Coordination - CGPE/DIPOA now becomes responsible for initiating the notification procedures together with the Federal Superintendents of Agriculture - SFAs, in order to open the investigation process, so that the General Inspection Coordination - CGI/DIPOA can analyze the information provided by the DDA/SFA.

From the foregoing, this document aims to update and harmonize the procedures to be taken into consideration by the DIPOA and SIPOA/SISA/SIFISA and establish an objective flow of information and responsibilities in order to improve the treatment of international reports involving nonconformities in POA and nonconformities detected by the PNCRC/MAPA in the DIPOA.

2. TREATMENT OF INTERNATIONAL NOTIFICATIONS INVOLVING ANIMAL PRODUCTS AND NONCONFORMITIES IDENTIFIED BY THE NATIONAL WASTE AND CONTAMINANTS CONTROL PLAN- PNCRC/MAPA

2.1. PROCEDURES FOR RECEIPT OF INTERNATIONAL NOTIFICATIONS IN POA AND OF NONCONFORMITIES FROM THE PNCRC/MAPA

Reports of nonconformities from the PNCRC/MAPA and international notifications in POA will now be received through the institutional emails by the CGPE/DIPOA, as shown in Table 1 below:

Leandro D. Antino Feijó
Fiscal Federal - Insperquano
Médico Veterinário CRMV/MS 5277
Diretor da DPOA/SDA - Substituto

SPECIES/PRODUCT	SECTOR	EMAIL
INTERNATIONAL NOTIFICATIONS IN POA	CGPE	alertarapido@agricultura.gov.br
VIOLATIONS - PNCRC	CGPE	dipoa.pncrc@agricultura.gov.br

The reports received by the DIPOA regarding nonconformities detected by the PNCRC/MAPA and international notifications involving POA will be evaluated with regard to existing information in order to enable the start of actions being taken to carry out an investigation. The DIPOA asserts investigative actions will only be taken due to international notifications when they present complete information (Decree No. 53/2009, art. 2, item 1) that allows traceability of the production involved and is certified by the Federal Inspection Service - SIF.

In this context, upon receipt of international notifications that do not allow traceability of the production involved and are not certified, the CGPE/DIPOA will return them to the Department of International Agribusiness Relations - SRI/MAPA, to supplement the missing information.

The international notifications and nonconformities information from the PNCRC/MAPA will be included by the CGPE/DIPOA in specific spreadsheets to enable its proper management in the DIPOA, as shown in Table 2 below:

TYPE OF NOTIFICATION	MANAGEMENT SPREADSHEET	SPREADSHEET LOCATIONDSHEET
Microbiological/ Physico-chemical notifications	DIPOA Table - INTERNATIONAL NOTIFICATIONS	Shared DIPOA folder - INTERNATIONAL NOTIFICATIONS and PNCRC - 2014 - INTERNATIONAL NOTIFICATIONS
PNCRC Violation	DIPOA INVESTIGATION - TABLE - PNCRC	Shared DIPOA Folder - INTERNATIONAL NOTIFICATIONS and PNCRC - 2014 - MONITORING OF VIOLATIONS

The purpose of using the management spreadsheets is to allow tracking and easy access to the notifications history, by SIF, by country, by year, by species, by chemical/microbiological hazard, as a base for DIPOA activities such as audits,

Leandro Dias Antino Feijó
Fiscal Federal - Agropecuária
Médico Veterinário - CRMV/MG 8277
Diretor de DIPOA/DA - Substituto

training, preparation for receiving foreign missions, among others. It is therefore critical that spreadsheets are filled out in full and in a standardized manner to allow the use of filters and the conduction of any research that may be necessary.

2.2 NOTICES TO THE STATES (FSAs)

For each international notification in POA received or detection of nonconformity from the PNCRC/MAPA, the CGPE/DIPOA should prepare a notification memo to all SFAs/UF, containing the specific procedures to be considered by the DDA/SFA involved and presenting all necessary information to allow the opening of an investigation. For cases of actions in the scope of the PNCRC/MAPA, the notification memo will also report the rural property involved in the violation of the program.

In both situations the notification memo will be available in the "SIGSIF System Bulletin Board", PNCRC tab (Violation – Notification. The purpose of this procedure is to provide all documents of interest to the SIF in real time and in a central and easy to access location. Each memo inserted in SIGSIF shall have attached all the documents that gave rise to the notification under consideration (eg statement from the health authority, the agricultural attaché of the Ministry of Foreign Affairs - MRE, SFI/MAPA, the Waste and Contaminants Coordination - CRC/SDA, among others that CGPE/DIPOA deems necessary).

From the publication of this information in the SIGSIF System, the DIPOA will therefore consider that the DDA/SFAs and SIFs are readily aware of the notifications for immediate start of their regulatory actions for the implementation of investigative actions.

3. PROCEDURES UNDER THE SCOPE OF THE ADD/SFA: START OF PROCESS AND INVESTIGATION

Once the notification is available on the " SIGSIF Bulletin Board", the head of DDA/SFA should proceed, conforming to information from the memorandum, consulting with all possible sectors involved in the SFA for immediate formalization and starting of the process of investigation.

Leandro de Aguiar Feijó
Fiscal Federal de Agropecuária
Médico Veterinário - CRMV/MG 5277
Diretor de DIPA/SDA - Substituto

To this end, the DIPOA establishes response deadlines, which must be taken into Consideration by the DDA/SFA:

- Microbiological notifications (10 days for the company's response to the SIF + 10 days for the response of the SFA to the CGI/DIPOA- Total: 20 days),
- Physico-chemical Notifications- (20 days for the company's response to the SIF + 10 days for the response of the SFA to the CGI/DIPOA- Total: 30 days)
- Notifications from the PNCRC/MAPA (20 days for the company's response to the SIF + 10 days for the response of the SFA to the CGI/DIPOA- Total: 30 days)

The DDA/SFA only forwards the investigation process to the competent Division of CGI/DIPOA when it understands that the investigation and the action plan presented by the company and or local SIF were satisfactory, emitting conclusive opinion on the matter (Decree 53/2009, art. 4, item 7). The DIPOA asserts that it is necessary to forward the processes properly registered and scanned in the SIGED, so that the information in the system can be accessed if needed. In order to facilitate the development of the respective action plans as part of the investigation procedures, the DIPOA forwards guidelines for such a procedure (Attachment 03).

4. FINALIZING THE PROCESS IN THE DIPOA SCOPE

The Division/CGI to receive the process from the DDA/SFA should evaluate it, and if favorable, conclude the investigation within the scope of the DIPOA, preparing a final technical report to be forwarded to the CGPE/DIPOA to be prepared as a response with ratification of the GAB/DIPOA for sending the SDA in order for the CRC (notifications from the PNCRC/MAPA) and SRI to notify the country of origin of the notification, according to the case.

In this context, it is up to the Division/CGI to update the information of the notifications in the management spreadsheets relating to the date of receipt of the state's response, as well as the identification data of the process with the conclusive opinion, the data on the finalization of the investigation and completion of the action plan.

The CGPE / DIPOA must analyze the final documentation and fill out the management spreadsheets with the date of receipt, by the Division/CGI, of the process and with the identification of the document notifying the Secretariats (SDA/SRI) involved and CRC/SDA (for cases of notifications from the PNCRC/MAPA). The documents prepared by

Coordinations should be scanned and included in SIGED for quick notification to those interested.

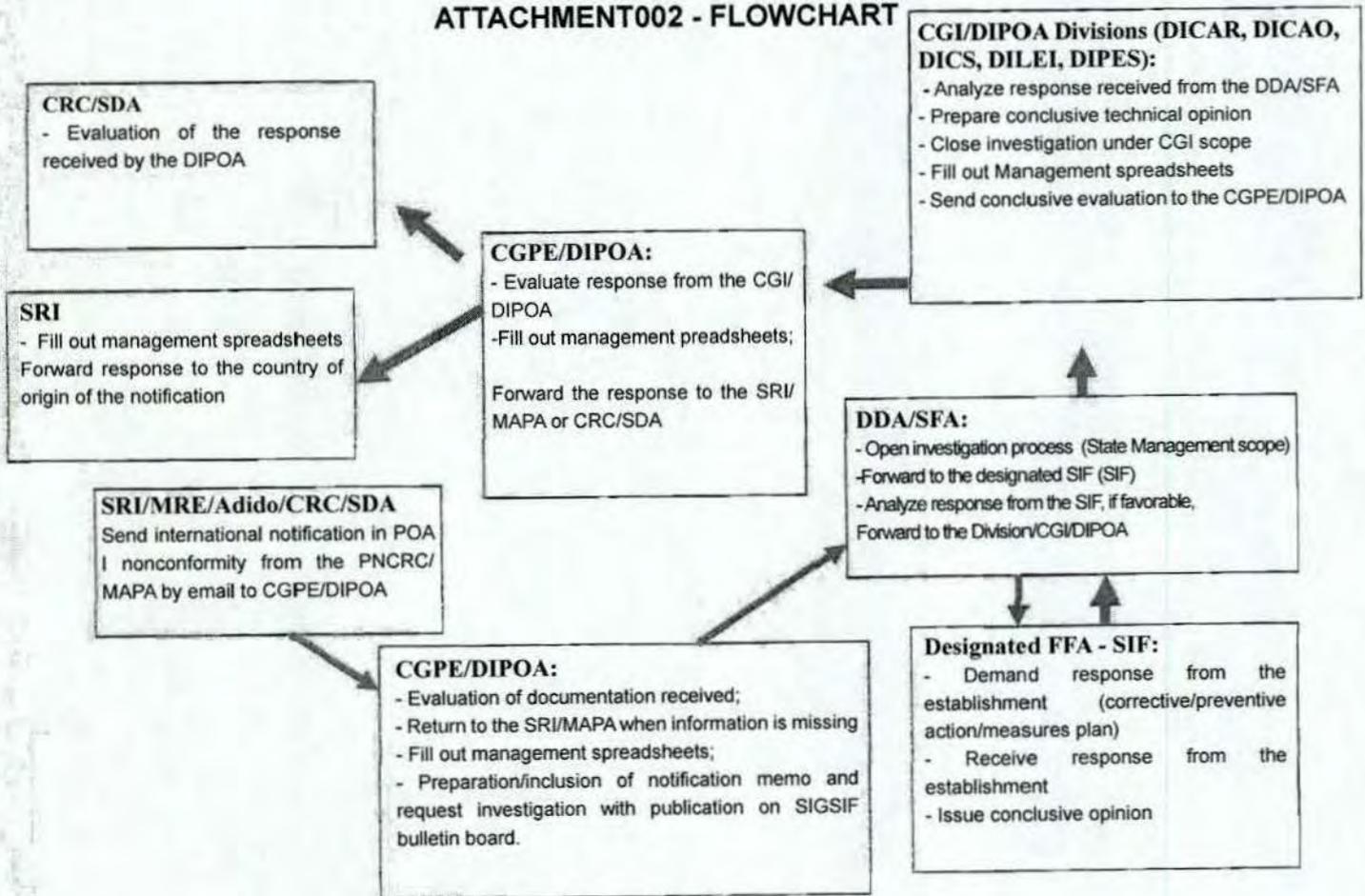
The SRI/MAPA undertake to receive the final documentation and fill out the management spreadsheet with the date of receipt, by the DIPOA, of the process and with the identification of the document notifying the health authorities of the countries of origin notification.

The public folder containing the information management spreadsheets will be available to the CGI and CGPE in the DIPOA/SDA scope, as well as to the SRI/MAPA, for update and consultation, with access granted only to previously authorized servers.

Regards,


Leonardo Dias Antino Feijó
Fiscal Federal de Agropecuária
Médico Veterinário CRMV/MG 6277
Diretor do DIPOA/SDA - Substituto

ATTACHMENT002 - FLOWCHART



Leandro D. Martins Feijó
Fiscal Federal de Rendas
Médico Veterinário - CRMV/MG 6277
Diretor do DIPOA/SDA - Substituto

ATTACHMENT 03- CONSIDERATIONS FOR THE IDENTIFICATION OF THE CAUSE
AND PLAN OF ACTION DEVELOPMENT

**Considerations for the identification
of the cause and Plan of Action
development**

Brasilia:
Ari Crespim dos Anjos

Ministry of
agriculture, livestock
and supply

GOVERNO FEDERAL
BRASIL
PAIS RICO E PAIS SEM POBREZA

Objectives of the Action Plan

Identify and control the contamination of the product

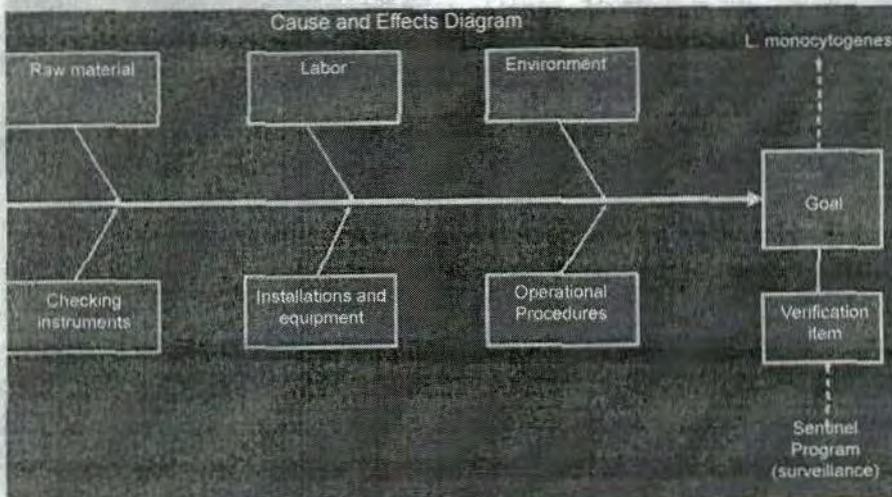
1. Identify the cause of the deviation
2. Identify the measures that will avoid reoccurrence
3. Identify corrective measures
4. Identify the measures that will avoid adulterated products being exported to the Ukraine

Ministry of agriculture, livestock and supply

Investigation of the cause

Investigation of the cause of the contamination, applying the tool known as the causes and effects diagram

Ministry of agriculture, livestock and supply



Ministry of agriculture, livestock and supply

Investigation of the cause

Raw Material

- Meat
- Inputs (packaging, ingredients, water, etc.)

Ministry of agriculture, livestock and supply

Investigation of the cause

Raw material (meat)

Methodology:

- Follow the process flow and identify points of cross contamination (multiple forms)
- Storage (time for freezing, fluctuations in temperature)
- Examine the purchase criteria and controls

Ministry of agriculture, livestock and supply

Investigation of the cause

Packaging material

Methodology

- Examine the purchase criteria for packaging material
- Observe the storage conditions of the packaging
- Observe the possible occurrence of cross-contamination during packaging of products in cardboard boxes

Ministry of agriculture, livestock and supply

Investigation of the cause

Water supply

Methodology

- Investigate the source
- Treatment (impact on the turbidity)
- Examine the results of analysis

Ministry of agriculture, livestock and supply

Investigation of the cause

Labor

Methodology

- Observation of the hygiene habits
- Observation of personal hygiene
- Observe the movement of people

Ministry of agriculture, livestock and supply

Investigation of the cause

Environment

- Internal (Temperature, air flow, waste water)
- External (formation of aerosols, proliferation of pests)

Ministry of agriculture, livestock and supply

Investigation of the cause

Waste water

Methodology:

- Observe whether the waste water could represent a source of contamination of the products or of the processing environment
- Observe whether runoff occurs upstream from the production line

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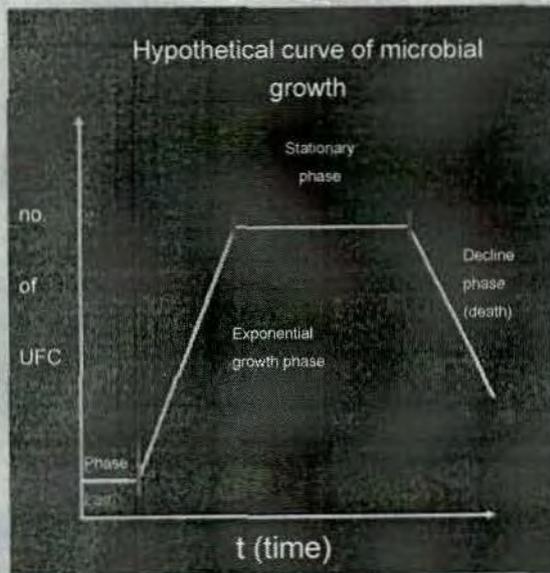
Investigation of the cause

Temperatures

Methodology:

- Observe the occurrence of condensation (difference in temperature between the products and the environment)
- Observe the formation of dust (aerosols)
- Observe the temperature of the products (bacterial growth)

Ministry of agriculture, livestock and supply



Ministry of agriculture, livestock and supply

Investigation of the cause

Pest control

Methodology

- Observe the external environment (shelter, water and sewage: facilitate the proliferation)
- Barrier to entry into the industrial environment
- Surveillance system

Ministry of agriculture, livestock and supply

Investigation of the cause

Facilities

Methodology

- Observe whether the facilities offer the proper protection against contamination due to external factors
- Observe the efficiency of the "barriers" to the flow of air and aerosol from the external environment to the interior of the factory
- Observe the efficiency of the "barriers" to the flow of air and aerosols from more contaminated internal areas to less contaminated areas

Ministry of agriculture, livestock and supply

Investigation of the cause

Equipment

Methodology

- Evaluation of the contact surfaces material, with regard to:
 - ease of cleaning (smooth, non-porous);
 - The transference of odors;
 - The transference of toxic waste
- Evaluation of contact surfaces, regarding maintenance:
 - Finishing of the welds
 - Ease of dismantling
 - Wear and tear that makes cleaning difficult

Ministry of agriculture, livestock and supply

Investigation of the cause

Operational Procedures

Methodology:

- Observe whether cross-contamination can occur due to contact with handlers, environment, facilities or equipment.
- Observe situations that may favor the growth of bacteria (time of retention of the product at each stage and temperature).

Ministry of agriculture, livestock and supply

Content of the Plan of Action (prepared based on the Ishiwaka diagram)

Item	Cause (*)	Effect (**) (deficiency)	Control measures		Deadline
			contingency	scheduled	

(*) The industry can cite one or more Ishiwaka Diagram elements (Ex. equipment maintenance failures)

(**) Cite nonconformities identified with the application of the elements of inspection or microbiological results

Ministry of agriculture, livestock and supply



MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO.
Secretaria de Defesa Agropecuária
Departamento de Inspeção de Produtos de Origem Animal
Coordenação Geral de Programas Especiais

CIRCULAR Nº 58 /2015/CGPE/DIPOA

Brasília, 27 de janeiro de 2015.

Do: Coordenador Geral de Programas Especiais - CGPE

Aos: Superintendentes Federais de Agricultura com vistas aos chefes dos SIPOA's, SISA's e SIFISA's.

Assunto: EUA. EXCLUSÃO. ATUALIZAÇÃO DA LISTA DE PRODUTOS HABILITADOS. SIF 385.

Comunicamos, para os devidos fins, a atualização na lista de produtos, da indústria abaixo caracterizada, na Lista de estabelecimentos habilitados à exportação para os Estados Unidos.

Nº de Controle Veterinário: SIF 385

Razão Social: JBS S/A

CNPJ (MF): 02.916.265/0011-31

Localização: AV. JOSÉ BATISTA SOBRINHO S/Nº

Bairro: SÃO FRANCISCO

Cidade: ANDRADINA - SP

CEP: 16.901-904

Atualização realizada:

CARNE COZIDA E CONGELADA DE BOVINO - (EXCLUIR)

Produtos Autorizados:

**CARNE DE BOVINO "IN NATURA"- MPP/IND
CONSERVAS ENLATADAS
EXTRATO DE CARNE**

Atenciosamente,


Clóvis Augusto Versalli Serafini
Fisica Federal Agropecuária
Médico Veterinário CRM/MT - 3277
Coordenador Geral de Programas Especiais



MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO.
Secretaria de Defesa Agropecuária
Departamento de Inspeção de Produtos de Origem Animal
Coordenação Geral de Programas Especiais

CIRCULAR Nº 59 /2015/CGPE/DIPOA

Brasília 27 de janeiro de 2015.

Do: Coordenador Geral de Programas Especiais - CGPE

Aos: Superintendentes Federais de Agricultura com vistas aos chefes dos SIPOA's, SISA's e SIFISA's.

Assunto: EUA. EXCLUSÃO. ATUALIZAÇÃO DA LISTA DE PRODUTOS HABILITADOS. SIF 337.

Comunicamos, para os devidos fins, a atualização na lista de produtos, da indústria abaixo caracterizada, constante na Lista de estabelecimentos brasileiros habilitados à exportação para os Estados Unidos da América.

Nº de Controle Veterinário: SIF 337

Razão Social: JBS S/A

CNPJ (MF): 02.916.265/0086-59

Localização: PRQ INDUSTRIAL, S/N,

Bairro: DISTRITO INDUSTRIAL

Cidade: LINS - SP

CEP: 16.404-110

Atualização realizada:

BEEF JERKED - (EXCLUIR)

Produtos Autorizados:

**CARNE COZIDA E CONGELADA DE BOVINO
CARNE DE BOVINO "IN NATURA"- MPP/IND
CONSERVAS ENLATADAS
EXTRATO DE CARNE
BEEF IN POUCH**

Atenciosamente,


Clovis Augusto Versalli Serafini
Fiscal Federal Agropecuário
Médico Veterinário - CRMV/MS - 3277
Coordenador Geral de Programas Especiais



MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO - MAPA
SECRETARIA DE DEFESA AGROPECUÁRIA - SDA
DEPARTAMENTO DE INSPEÇÃO DE PRODUTOS DE ORIGEM ANIMAL – DIPOA
COORDENAÇÃO GERAL DE PROGRAMAS ESPECIAIS – CGPE

CIRCULAR Nº 622/2014/CGPE/DIPOA

Brasília, 15 de agosto de 2014.

Do: Coordenador Geral de Programas Especiais - CGPE

Aos: Superintendentes Federais de Agricultura com vistas aos Chefes dos SIPOA's, SISA's e SIFISA's.

Assunto: Procedimentos para estabelecimentos de carne bovina habilitados para EUA.

Senhores chefes,

Considerando a publicação da Instrução Normativa nº 57/2013, de 12/12/2013 e da Instrução Normativa nº 19/2014, de 25/06/14, que tratam dos critérios e requisitos para o credenciamento e monitoramento de laboratórios pelo Ministério da Agricultura, Pecuária e Abastecimento;

Considerando a necessidade de aperfeiçoamento dos procedimentos de autocontrole dos estabelecimentos visando à prevenção e o controle de ivermectina em matérias-primas e produtos finais exportados e a melhoria da verificação oficial;

Considerando que na última missão veterinária do FSIS/USDA conjunta ao APHIS/USDA, para verificação da equivalência de sistemas de inspeção, realizada entre 18 de fevereiro e 14 de março de 2013, observou-se que o DIPOA não dispunha de diretrizes harmonizadas sobre materiais de risco específico para encefalopatia espongiforme bovina em conformidade aos requerimentos citados na norma americana 9 CFR 310.22;

Considerando a necessidade dos SIPOA/SISA/SIFISA gerenciarem com maior efetividade os seus recursos humanos, materiais e financeiros disponíveis para a realização das supervisões em estabelecimentos habilitados a exportar para os Estados Unidos da América.

O DIPOA estabelece que:

1) ANÁLISES MICROBIOLÓGICAS:

As análises de swab de meias-carcaças para pesquisa de *Salmonella* spp e *Escherichia coli* genérica, pesquisa de *Listeria monocytogenes* em produto acabado e para fins de controle ambiental, devem ser realizadas de forma sistemática e contínua de acordo com os programas de autocontrole implantados pelos estabelecimentos habilitados.

A verificação oficial do cumprimento destes programas de autocontrole será realizada por este Ministério por meio de programa de controle oficial a ser estabelecido em conjunto com a Comissão Científica Consultiva em Microbiologia de Produtos de Origem Animal, instituída pela Portaria SDA nº 17, de 25 de janeiro de 2013.

2) IVERMECTINA:

Os estabelecimentos devem implementar medidas de controle de processo para mitigar o risco de violação de resíduos de ivermectina, preliminarmente, pelos programas de pré-requisitos e, finalmente, pelo Programa APPCC. As análises para pesquisa de ivermectina para fins de autocontrole podem ser realizadas

 1

na matriz fígado e/ou músculo nos estabelecimentos que estão habilitados ao fornecimento de matérias-primas para o mercado americano.

Nos estabelecimentos que elaboram produtos finais devem ser realizadas análises em cada lote. Para tanto, cada estabelecimento deve elaborar um plano de amostragem com fundamentação técnico-científica. No mínimo, uma análise será exigida por lote de produtos finais para respaldar a certificação.

As amostras de produto final devem ser coletadas pelo SIF e podem ser enviadas para processamento nos laboratórios de controle interno ou credenciados, conforme Memorando Conjunto nº 03/GAB/DIPOA/CGAL/2014, de 30/07/2014. A técnica analítica será a cromatografia líquida de alto desempenho (HPLC), mesma técnica utilizada pelo FSIS/USDA.

No segundo semestre de 2014, um novo programa exploratório oficial será delineado pelo DIPOA para verificar a presença de resíduos de avermectinas nos produtos finais exportados para os Estados Unidos da América. Todas as coletas serão realizadas pelo SIF e as amostras serão processadas no LANAGRO de MG e do RS.

3) MATERIAIS DE RISCO ESPECÍFICO (MRE) PARA ENCEFALOPATIA ESPONGIFORME BOVINA (EEB):

Para equivalência com FSIS/USDA, devem ser considerados MRE-EEB: encéfalo, crânio, olhos, gânglio trigêmio, medula espinhal, raízes e gânglios espinhais, coluna vertebral (excluindo as vértebras da cauda, os processos transversais das vértebras torácicas e lombares e as asas do sacro) de bovinos de 30 meses de idade ou mais, as amígdalas ou tonsilas e a porção do fêo na medida de 203,2 cm (oitenta polegadas) de bovinos de todas as idades.

O crânio (com o gânglio trigêmio) e a coluna vertebral (com os gânglios e raízes nervosas) podem ser destinados à graxaria e os demais MRE-EEB devem ser manipulados de forma a prevenir a contaminação cruzada das matérias-primas e produtos finais exportados e, em seguida, incinerados ou aterrados. Até posterior deliberação pela Secretaria de Defesa Agropecuária, devem ser seguidos os procedimentos previstos no item 4 da CIRCULAR Nº 463/DCI/DIPOA, de 05/08/2004.

4) SUPERVISORES:

Os SIPOA/SISA/SIFISA devem realizar revisão a fim de verificar a necessidade de ampliar ou reduzir a listagem de supervisores, ressaltando que estes devem possuir capacitações em APPCC (mínimo de 16h) e nas exigências do FSIS/USDA (mínimo de 8h).

Os SIPOA/SISA/SIFISA devem promover capacitação e avaliação periódica dos supervisores. Também, devem, sistematicamente, atualizar a listagem de supervisores e comunicar à DICAR/CGI/DIPOA.

Por fim, os encarregados dos SIF e os supervisores devem envidar esforços para que os itens descritos acima sejam cumpridos de forma imediata, correta e rotineira pelos estabelecimentos habilitados.

Ficam alteradas as disposições contrárias previstas no MEMO CIRCULAR Nº 001/2007, de 23/01/2007, no Ofício Circular nº 21/2010/GAB/DIPOA, de 13 de julho de 2010, na CIRCULAR Nº 196/CHC/DIPOA, de 21 de setembro de 2010, e no Ofício Circular nº 02/2014/GAB/DIPOA, de 09 de junho de 2014. Fica revogado o Ofício Circular nº 27/2009/GAB/DIPOA, de 01 de dezembro de 2009.

Atenciosamente,


Lovis Augusto Versalli Serafini
Fiscal Federal Agropecuário
Médico Veterinário CRMV/MT - 3277
Diretor do DIPOA - Substituto



MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO
Secretaria de Defesa Agropecuária
Gabinete

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Ofício SDA/MAPA nº /2012

Orientação de Procedimentos para o Plano Nacional de Controle de Resíduos e Contaminantes – PNCRC/MAPA.

Brasília, 18 de abril de 2012.

Aos: Superintendentes Federais de Agricultura – SFA

Assunto: Bloqueio temporário da emissão de Guia de Trânsito Animal (GTA), e demais procedimentos, para os casos de violações motivadas por resultados de análises não conformes do PNCRC, suspeita de uso inadequado de produtos veterinários, e denúncia de uso de produtos veterinários proibidos ou clandestinos.

Observações:

I - Esse procedimento atualiza e revoga o Ofício CRC/SDA nº 24/2011;

II - Esse procedimento possui caráter orientativo, não substituindo as normas previstas no Decreto 5053/2004, Instrução Normativa nº 55/2010, Portaria 396/2009, ou qualquer outro dispositivo em vigor que respalde as ações do subprograma de investigação;

III - Para o caso de ocorrências envolvendo substâncias de uso proibido (itens 2 e 3), após a CRC avaliar o processo de investigação realizado na propriedade rural, a SDA, por proposição da CRC, encaminhará o processo ao Superintendente da SFA da UF na qual a propriedade estiver localizada, e oficialmente solicitará que o mesmo submeta-o ao Ministério Público Federal e à Superintendência Regional da Polícia Federal locais conforme o art. 11 da Portaria 396 de 23/11/2009;

IV - Nos casos de identificação das substâncias do grupo dos Estilbenos (Hexestrol, Dienestrol e Dietilestilbestrol) deverão ser adotadas as medidas previstas no art. 5º da Instrução Normativa nº 55 de 01/12/2011.

Segue abaixo as orientações para cada caso:

1) PARA O CASO DE VIOLAÇÕES DE PRODUTOS DE USO VETERINÁRIO PERMITIDOS:

- a) A partir da emissão do **Aviso de Violação**, proceder ao **bloqueio temporário das emissões de Guias de Trânsito Animal - GTA's**, de saída de animais da mesma categoria do lote de animais amostrado, bem como dos animais de mesma espécie em categorias subsequentes, **pelo "período de carência do produto de uso veterinário utilizado", quando o mesmo for identificado durante a investigação, ou pelo "maior" período de carência dentre os produtos de uso veterinário registrados no MAPA com a mesma substância ativa objeto da violação, quando não for possível a identificação do produto durante a investigação;**
- b) Comunicação pela SFA ao Serviço Oficial do Estado, quando for o caso, solicitando a suspensão da emissão das GTA's pelo período e da mesma forma estabelecidos no item 1.a);

Enio Antonio Marques Peres



MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO
Secretaria de Defesa Agropecuária
Gabinete

- c) Investigação da propriedade envolvida, com base em Aviso de Violação previamente emitido, conforme disposto na Portaria nº 396/2009;
- d) Após o período de impedimento de movimentação dos animais, estabelecidos no item 1.a), deverão ser coletadas amostras para análise dos próximos lotes de animais encaminhados para abate, até que se obtenha um quantitativo de 05 resultados consecutivos conformes, de acordo com o disposto na Portaria nº 396/2009.

2) PARA OS CASOS DE VIOLAÇÕES DE PRODUTOS VETERINÁRIOS DE USO PROIBIDO OU CLANDESTINOS:

- a) A partir da emissão do **Aviso de Violação**, proceder ao **bloqueio temporário das emissões de Guias de Transito Animal - GTA's**, de saída de animais da mesma categoria do lote de animais amostrado, bem como dos animais de mesma espécie em categorias subsequentes, **pelo período de "06 (seis) meses"**;
- b) Comunicação pela SFA ao Serviço Oficial do Estado, quando for o caso, solicitando a suspensão da emissão das GTA's pelo período e da mesma forma estabelecidos no item 2.a);
- c) Investigação da propriedade envolvida, com base em Aviso de Violação previamente emitido, conforme disposto na Portaria nº 396/2009;
- d) Após o período de impedimento de movimentação dos animais, estabelecido no item 2.a), deverão ser coletadas amostras para análise dos próximos lotes de animais encaminhados para abate, até que se obtenha um quantitativo de 05 resultados consecutivos conformes, de acordo com o disposto na Portaria nº 396/2009.

3) PARA OS CASOS DE FUNDADAS SUSPEITAS E DENÚNCIAS DE USO, OU IDENTIFICAÇÃO DE PRODUTOS VETERINÁRIOS DE USO PROIBIDO OU CLANDESTINOS:

- a) Quando identificados, apreensão imediata, mediante emissão de termo de apreensão, e recolhimento dos produtos, conforme o Decreto nº 5053/2004;
- b) Como medida sanitária preventiva, **bloqueio temporário das emissões de Guias de Transito Animal - GTA's** de saída de animais da mesma categoria do lote de animais amostrado, bem como dos animais de mesma espécie em categorias subsequentes, **pelo período de "06 (seis) meses"**;
- c) Comunicação pela SFA ao Serviço Oficial do Estado, quando for o caso, solicitando a suspensão da emissão das GTA's pelo período e da mesma forma estabelecidos no item 3.b);
- d) Comunicação da ocorrência à CRC/SDA por meio do formulário conforme **Anexo I**, a fim de que seja emitido o devido **Aviso de Violação**;
- e) Investigação da propriedade envolvida, com base em Aviso de Violação previamente emitido, conforme disposto na Portaria nº 396/2009;
- f) Após o período de impedimento de movimentação dos animais, estabelecido no item 3.b), havendo método analítico validado para análise da(s) substância(s) foco da suspeita/denúncia nos laboratórios da Rede Oficial de Laboratórios do MAPA, deverão ser coletadas amostras para análise dos próximos lotes de animais, caso os mesmo sejam encaminhados para abate, até que se obtenha um quantitativo de 05 resultados consecutivos conformes, de acordo com o disposto na Portaria nº 396/2009. Caso não haja método analítico validado, após o período estabelecido no item 3.b), o bloqueio da emissão de GTA's deverá ser suspenso e os animais liberados para abate.



MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO
Secretaria de Defesa Agropecuária
Gabinete

4) QUANDO DO ABATE DE ANIMAIS EM ESTABELECIMENTO SOB SIF, PARA OS CASOS DE SUSPEITAS DE USO DE PRODUTOS VETERINÁRIOS PROIBIDOS OU CLANDESTINOS OU IDENTIFICAÇÃO DE USO INDEVIDO DE PRODUTOS VETERINÁRIOS PERMITIDOS:

- a) Quando identificados animais suspeitos, caso os mesmo sejam abatidos, o Serviço de Inspeção Federal – SIF local procederá ao sequestro dos produtos oriundos do lote de animais abatidos, conforme o Decreto nº 30.691/1952;
- b) Como medida sanitária preventiva, **bloqueio temporário das emissões de Guias de Transito Animal - GTA's** de saída de animais da mesma categoria do lote de animais amostrado, bem como dos animais de mesma espécie em categorias subsequentes, **“até que as ações oficiais cabíveis evidenciem se houve ou não a ocorrência de violação”**;
- c) Comunicação da ocorrência à CRC/SDA por meio do formulário conforme **Anexo II**, a fim de que seja emitido o devido **Aviso de Suspeita de Violação** a ser encaminhado ao DFIP/SDA para a devida investigação da propriedade envolvida, conforme disposto na Portaria nº 396/2009;
- d) Após a investigação na propriedade, conforme estabelecido no item 4.c), **uma vez NÃO evidenciada a ocorrência de violação**, desbloqueio das emissões de Guias de Transito Animal - GTA's da propriedade e liberação dos respectivos produtos sequestrados em poder do SIF local para o consumo;
- e) Após a investigação na propriedade, conforme estabelecido no item 4.c), **uma vez evidenciada a ocorrência de violações ou desvio de uso**, seguir os mesmos procedimentos e trâmites previstos nos itens 1, 2 ou 3 deste Ofício, conforme o caso.

Atenciosamente,


Enio Antonio Marques Pereira
Secretário de Defesa Agropecuária



SERVIÇO PÚBLICO FEDERAL
MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO - MAPA
SUPERINTENDENCIA FEDERAL DE AGRICULTURA - SFAV (UF)

ANEXO I - AVISO DE VIOLAÇÃO

COMUNICADO OFICIAL DE DENÚNCIA DE USO / SUSPEITA DE USO DE PRODUTO VETERINÁRIO PROIBIDO OU CLANDESTINO.

Nº _____ / _____ / 20____
(UF)

Plano Nacional de Controle de Resíduos e Contaminantes – PNCRC/MAPA

1. DADOS DA PROPRIEDADE

1.1 NOME	
1.2 ENDEREÇO	
1.3 CEP	
1.4 MUNICÍPIO / UF	
1.5 GEORREFERENCIAMENTO	
CÓDIGOS DO SERVIÇO OFICIAL (Preencher, no mínimo, um dos três códigos abaixo)	
1.6 CÓDIGO DO SERVIÇO OFICIAL	
1.7 INSC. ESTADUAL	
1.8 NIRF	

2. DADOS DO PROPRIETÁRIO

2.1 NOME	
2.2 ENDEREÇO	
2.3 CEP	
2.4 MUNICÍPIO / UF	
2.5 CPF ou CNPJ	Tipo: () CPF () CNPJ Número:
2.5 FONE	COMERCIAL () CELULAR ()

3. DADOS DA DENUNCIA / SUSPEITA

3.1 ESPÉCIE	
3.2 PRODUTO ENCONTRADO:	



SERVIÇO PÚBLICO FEDERAL
MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO - MAPA
SUPERINTENDENCIA FEDERAL DE AGRICULTURA - SFA/ (UF)

ANEXO II - AVISO DE SUSPEITA DE VIOLAÇÃO

COMUNICADO OFICIAL DE SUSPEITA DE DESVIO DE USO DE PRODUTO VETERINÁRIO PERMITIDO OU USO DE PRODUTO VETERINÁRIO PROIBIDO OU CLANDESTINO.

Nº _____ / _____ / 20____
(UF)

Plano Nacional de Controle de Resíduos e Contaminantes – PNCRC/MAPA

1. DADOS DA PROPRIEDADE

1.1 NOME	
1.2 ENDEREÇO	
1.3 CEP	
1.4 MUNICÍPIO / UF	
1.5 GEORREFERENCIAMENTO	
CÓDIGOS DO SERVIÇO OFICIAL (Preencher, no mínimo, um dos três códigos abaixo)	
1.6 CÓDIGO DO SERVIÇO OFICIAL	
1.7 INSC. ESTADUAL	
1.8 NIRF	

2. DADOS DO PROPRIETÁRIO

2.1 NOME		
2.2 ENDEREÇO		
2.3 CEP		
2.4 MUNICÍPIO / UF		
2.5 CPF ou CNPJ	Tipo: () CPF () CNPJ Número:	
2.5 FONE	COMERCIAL ()	CELULAR ()

3. DADOS DA SUSPEITA

3.1 ESPÉCIE	
-------------	--



Presidência da República
Casa Civil
Subchefia para Assuntos Jurídicos

LEI Nº 9.832, DE 14 DE SETEMBRO DE 1999.

Proíbe o uso industrial de embalagens metálicas soldadas com liga de chumbo e estanho para acondicionamento de gêneros alimentícios, exceto para produtos secos ou desidratados.

O PRESIDENTE DA REPÚBLICA Faço saber que o Congresso Nacional decreta e eu sanciono a seguinte Lei:

Art. 1º É proibido em todo o território nacional, a partir de dois anos da entrada em vigor desta Lei, o uso industrial de embalagens metálicas soldadas com liga de chumbo e estanho para acondicionamento de gêneros alimentícios, exceto para produtos secos ou desidratados.

Art. 2º O não cumprimento do disposto no art. 1º implicará a aplicação das penalidades administrativas, civis e penais previstas em lei, inclusive aquelas de que trata o art. 56 da Lei nº 8.078, de 11 de setembro de 1990.

Art. 3º Esta Lei entra em vigor na data de sua publicação.

Brasília, 14 de setembro de 1999; 178º da Independência e 111º da República.

FERNANDO HENRIQUE CARDOSO
Marcus Vinivius Pratini de Moraes
José Serra
Alcides Lopes Tápias

Este texto não substitui o publicado no DOU de 15.9.1999

*



MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO
Superintendência Federal de Agricultura no Estado de São Paulo
Serviço de Inspeção de Produtos de Origem Animal

Assessoria de Carnes

Memorando Nº 113/2015

Data: 04/03/2015

Da: Assessoria de Carnes SIPOA/DDA/SFA-SP

Ao: À DICAR CGI/DIPOA com vistas à CHC/CGPE/DIPOA, CGPE/DIPOA e CGI/DIPOA

Assunto: Plano de Ação referente à Missão Veterinária FSIS/USDA, encaminha

Trata-se de encaminhamento de Plano de Ação referente às não conformidades apontadas pelo auditor americano durante Missão Veterinária do FSIS/USDA nos estabelecimentos sob SIF 337 e 385, em atendimento à solicitação da DICAR/CGI/DIPOA.

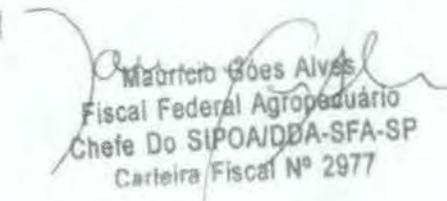
Após análise da documentação acostada somos de parecer **favorável** aos planos de ação propostos pelas empresas auditadas, onde são contempladas as medidas corretivas e preventivas adotadas frente aos desvios relatados.

Complementarmente, fazemos as seguintes observações:

- Conforme consta nas verificações realizadas pelos encarregados dos SIFs 337 e 385, os Planos de Ação apresentados foram integralmente concluídos;
- A atualização dos produtos habilitados à exportação aos EUA pelos SIFs 337 e 385 foi devidamente regularizada conforme Circular nº 58/2015/CGPE DIPOA (SIF 385) e Circular nº 59/2015/CGPE DIPOA (SIF 337);
- Em relação às demais pendências apontadas pelo auditor americano, referentes à correção de procedimentos de remoção de MER e ao código de análise de *Salmonella* spp., submetemos à considerações superiores em virtude da necessidade de padronização nacional.

À DICAR CGI/DIPOA com vistas à CHC/CGPE/DIPOA, CGPE/DIPOA e CGI/DIPOA.

Atenciosamente,


Maurício Goes Alvim
Fiscal Federal Agropecuário
Chefe Do SIPOA/DDA-SFA-SP
Carteira Fiscal Nº 2977

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION JBS S/A Andradina (Sao Paulo)	2. AUDIT DATE 9/23/2014	3. ESTABLISHMENT NO. SIF 385	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Alexander L. Lauro		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Est.#: SIF 385
 City and Country: Andradina, Brazil
 Date: 9/23/2014

The following non-compliances were not identified by Brazilian inspection officials during the establishment review:

39/51. The floor of the raw material receiving area for thermally processed product presented numerous cracks and fissures which would render it difficult to clean, and lead to the potential creation of insanitary conditions (section 3.c. of Brazilian regulation No. 175/2005/CGPE/DIPOA).

40/51. The intensity of the lighting at the veterinary disposition station was below the required value of 540 lux (section 3.c. of Brazilian regulation No. 175/2005/CGPE/DIPOA).

42/51. A section of dead-end pipe was observed in one of the processing areas (section 3.c. of Brazilian regulation No. 175/2005/CGPE/DIPOA).

In addition, the FSIS auditor noted the related to the implementation of Brazil's inspection system:

58. While observing the removal of tonsils in association with the establishment's SRM control program, the auditor noted that this was limited only to those of the palatine area, and that lingual tonsils were not removed. In addition, the establishment did not institute measures to prevent leakage of brain tissue from the knock-hole of cattle during head washing, which occurs in high-pressure cabinets. As per the establishment's written program, all cattle are treated as if they are thirty months of age or older, for which brain tissue is considered SRM. Subsequent conversations with DIPOA inspection officials indicated that this was compliant with the Brazilian domestic requirements for SRM removal. Neither beef tongues, nor meat derived from the head are currently exported to the U.S. from Brazil (neither whole, in part, nor included in product formulation).

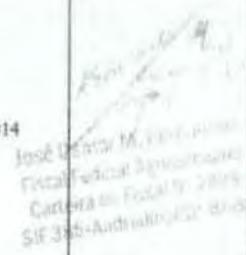
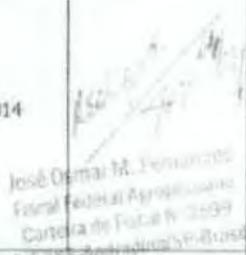
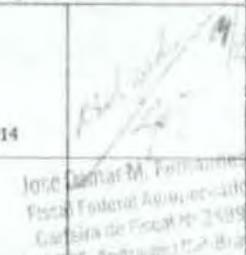
59. A review of *Salmonella* spp. carcass testing for results indicated that the approved laboratory was using FSIS method MLG 4.07, rather than the updated MLG 4.08 expected by the Ministry of Agriculture's division for General Coordination of Laboratory Support (CGAL).

61. NAME OF AUDITOR

Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE

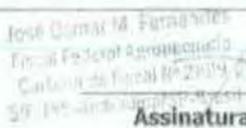
PLANO DE AÇÃO REFERENTE AO RELATÓRIO DE AUDITORIA DA MISSÃO VETERINÁRIA DO FSIS/USDA REALIZADA NO DIA 23/09/2014

ITEM	DESCRIÇÃO DA NÃO CONFORMIDADE	AÇÃO CORRETIVA	AÇÃO PREVENTIVA	PRAZO DE ATENDIMENTO ¹	VERIFICAÇÃO ²
39/51	O piso da área de recebimento de matéria prima para produtos processados termicamente apresentou numerosas rachaduras e fissuras as quais o tornariam de difícil limpeza, e conduzem a uma potencial criação de condições não-sanitárias (seção 3.c. da Regulamento Brasileiro No 175/2005/CGPE/DIPOA).	<p>a) Assegurar a adequada disposição dos produtos que podem ter sido contaminados: Não havia produto envolvido.</p> <p>b) Restaurar as condições sanitárias: Realizar os reparos no piso da área de recepção de matéria prima de industrializados com argamassa de cimento.</p>	<p>c) Prevenir a recorrência de contaminação direta ou adulteração de produtos: Realizar acompanhamento mensal no piso de recepção de matéria prima e repará-los quando necessário para evitar que ocorra fissuras.</p>	27/09/2014	 <p>José Demar M. Fernandes Fiscal Federal Agropecuario Carteira de Fiscal No 2489 SIF 385-Andaraí/RS-Brasil</p>
40/51	A intensidade da iluminação no Departamento de Inspeção Final (DIF) estava abaixo do valor requerido de 540 lux (seção 3.c. da Regulamento Brasileiro No 175/2005/CGPE/DIPOA).	<p>a) Assegurar a adequada disposição dos produtos que podem ter sido contaminados: Não havia produto envolvido.</p> <p>b) Restaurar as condições sanitárias: No intervalo do almoço, foi realizado o rebalçamento do conjunto de luminária da plataforma de inspeção do DIF atingindo 570 lux.</p>	<p>c) Prevenir a recorrência de contaminação direta ou adulteração de produtos: Incluir na planilha de monitoramento de lux semanal da GQ a iluminação da plataforma de inspeção.</p>	14/10/2014	 <p>José Demar M. Fernandes Fiscal Federal Agropecuario Carteira de Fiscal No 2489 SIF 385-Andaraí/RS-Brasil</p>
42/51	Uma tubulação com ponto cego foi observada em uma área de processamento (seção 3.c. da Regulamento Brasileiro No 175/2005/CGPE/DIPOA).	<p>a) Assegurar a adequada disposição dos produtos que podem ter sido contaminados: Não havia produto envolvido.</p> <p>b) Restaurar as condições sanitárias: Remover os pontos cegos da tubulação de água da triparia.</p>	<p>c) Prevenir a recorrência de contaminação direta ou adulteração de produtos: Inspeccionar demais pontos de água na fábrica em geral e remover os pontos cegos que forem encontrados.</p>	31/12/2014	 <p>José Demar M. Fernandes Fiscal Federal Agropecuario Carteira de Fiscal No 2489 SIF 385-Andaraí/RS-Brasil</p>



Assinatura do responsável da empresa

Paulo Cesar Rinaldi
Garante Industrial



José Demar M. Fernandes
Fiscal Federal Agropecuario
Carteira de Fiscal No 2489
SIF 385-Andaraí/RS-Brasil

Assinatura do encarregado do SIF - 385



MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO.
 Secretaria de Defesa Agropecuária
 Departamento de Inspeção de Produtos de Origem Animal
 Coordenação Geral de Programas Especiais

CIRCULAR Nº 58 /2015/CGPE/DIPOA

Brasília, 27 de Janeiro de 2015.

Do: Coordenador Geral de Programas Especiais - CGPE

Aos: Superintendentes Federais de Agricultura com vistas aos chefes dos SIPOA's, SISA's e SIFISA's.

Assunto: EUA. EXCLUSÃO. ATUALIZAÇÃO DA LISTA DE PRODUTOS HABILITADOS. SIF 385.

Comunicamos, para os devidos fins, a atualização na lista de produtos, da indústria abaixo caracterizada, na Lista de estabelecimentos habilitados à exportação para os Estados Unidos.

Nº de Controle Veterinário: SIF 385

Razão Social: JBS S/A

CNPJ (MF): 02.916.265/0011-31

Localização: AV. JOSÉ BATISTA SOBRINHO S/Nº

Bairro: SÃO FRANCISCO

Cidade: ANDRADINA - SP

CEP: 16.901-904

Atualização realizada:

CARNE COZIDA E CONGELADA DE BOVINO - (EXCLUIR)

Produtos Autorizados:

CARNE DE BOVINO "IN NATURA"- MPP/IND
 CONSERVAS ENLATADAS
 EXTRATO DE CARNE

Atenciosamente,

Cláudio Augusto Versalini Serafini
 Fiscal Federal Agropecuário
 Médico Veterinário CREA/MT - 3277
 Coordenador Geral de Programas Especiais

ENCAMINHA-SE AO:

- | | |
|---|---|
| <input type="checkbox"/> Setor Leite/Mel | <input type="checkbox"/> Setor Estatísticas |
| <input checked="" type="checkbox"/> Setor Carnes/Exp. | <input type="checkbox"/> Setor Bovinos |
| <input type="checkbox"/> Setor Pescado | <input type="checkbox"/> Setor Aves/Ovos |
| <input type="checkbox"/> SRH/SFA/SP | <input type="checkbox"/> Setor Análise Penall |
| <input type="checkbox"/> Secretaria para Atuar | <input type="checkbox"/> Para Avaliação Provida |
| São Paulo 03.03.15 | <input checked="" type="checkbox"/> Para conhecimento e Devid |

Maurício
 Mauricio Goes Alves
 Fiscal Federal Agropecuário
 Chefe Do SIPOA/DIPA-SFA-SP



MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO
Secretaria de Defesa Agropecuária
Superintendência Federal da Agricultura de São Paulo
Serviço de Inspeção de Produtos Agropecuários
Serviço de Inspeção Federal Nº 385



MEMORANDO Nº: 050/385/2015

EM: 04 / 03 / 2015

Do: Méd. Vet. Encarregado do SIF 385 – Andradina – SP

Ao: Dr. Maurício Alves Goês -Chefe do SIPOA/SFA - SP

**Assunto: Encaminha Plano de Ação referente ao relatório de Auditoria da
Missão Veterinária do FSIS/USDA.**

Em atenção ao Ofício SIPA/SP Nº 383/2004 de 08.10.2004, estamos encaminhando a Vossa Senhoria, cronograma de Não Conformidades (Plano de Ação) apontadas no relatório de Auditoria da Missão Veterinária do FSIS/USDA de 23.09.2014, realizado junto ao matadouro-frigorífico e fábrica de conservas JBS S/A – unidade de Andradina/SP, SIF 385, o qual somos favorável.

Informamos ainda a conclusão integral do referido Plano de Ação.

Atenciosamente

José Dumal M. Fernandes
Encarregado do SIF 385
Superintendência Federal da Agricultura de São Paulo
Serviço de Inspeção Federal Nº 385



Andradina, 04 de março de 2015.

De: Garantia da Qualidade

Para: Dr. José Osmar Maximino Fernandes/ SIF 385

Ofício nº: GI 385-15009

Assunto: Encaminha plano de ação referente a Missão Veterinária do FSIS/USDA

Prezado Senhor,

Vimos através deste, encaminhar plano de ação referente à Missão Veterinária do FSIS/USDA realizada no dia 23/09/2014.

Atenciosamente,

Garantia da Qualidade

Handwritten signature and date: 04/03/15

JBS S.A

Avenida José Batista Sobrinho s/n, Bairro São Francisco, CEP 16.901-904, Andradina/SP
Tel. (18) 3702-7500 / Fax. (18) 3702-7512

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION JBS S/A Lins (Sao Paulo)	2. AUDIT DATE 9/25/2014	3. ESTABLISHMENT NO. SIF 337	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Alexander L. Lauro		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Est.#: SIF 337
 City and Country: Lins, Brazil
 Date: 9/25/2014

The following non-compliances were not identified by Brazilian inspection officials during the establishment review:

- 10/51. Several crates used to store raw materials for the production of cooked beef were observed with exposed product. The plastic liners were broken, and the product was touching the metal bars of these crates (not considered a product contact surface). Upon identification of the issue by the auditor, the establishment took immediate corrective action by isolating and disposing of the exposed product, and committed to using double liners in all future crates until a definitive solution could be reached (e.g., purchasing of thicker linings, modification of crates to avoid puncturing of liners) [section 10.2 of Brazilian regulation No. 175/2005/CGPE/DIPOA].
- 40/51. Several lighting non-compliances were noted. One inspection station did not meet the requirement of 540 lux. In addition, many of the carcass transit areas did not meet the requirement of 110 lux [section 3.c. of Brazilian regulation No. 175/2005/CGPE/DIPOA].
- 48/51. A cooking bag, partially-filled with raw meat and bearing the mark of inspection, was inappropriately disposed of in a container used for inedible materials. In order to avoid the potential loss of identity of condemned materials, the meat should have been removed from the cooking bag prior to disposal [section 10.1 of Brazilian regulation No. 175/2005/CGPE/DIPOA].

In addition, the FSIS auditor noted the following related to the implementation of Brazil's inspection system:

36. The establishment was incorrectly registered and approved by DIPOA for the production of dried beef, a process for which the establishment no longer maintained the necessary equipment to conduct. This is not in accordance with Articles 20 to 76 of Brazil's Regulations for the Inspection of Industrial Sanitation for Products of Animal Origin (RIISPOA), which require that the Federal Inspection Service maintain an accurate listing of products for all registered establishments. The last profile update for this establishment was in 2012.
58. While observing the removal of tonsils in association with the establishment's SRM control program, the auditor noted that this was limited only to those of the palatine area, and that lingual tonsils were not removed. In addition, the establishment did not institute measures to prevent leakage of brain tissue from the knock-hole of cattle during head washing, which occurs in high-pressure cabinets. As per the establishment's written program, all cattle are treated as if they are thirty months of age or older, for which brain tissue is considered SRM. Subsequent conversations with DIPOA inspection officials indicated that this was compliant with the Brazilian domestic requirements for SRM removal. Neither beef tongues, nor meat derived from the head are currently exported to the U.S. from Brazil (neither whole, in part, nor included in product formulation).
59. A review of *Salmonella* spp. carcass testing for results indicated that the approved laboratory was using FSIS method MLG 4C.05, rather than the updated MLG 4.08 expected by the Ministry of Agriculture's division for General Coordination of Laboratory Support (CGAL).

61. NAME OF AUDITOR

Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE

PLANO DE AÇÃO DAS NÃO CONFORMIDADES APONTADAS DURANTE A MISSÃO VETERINÁRIA DOS FSIS/USDA

NOME DA EMPRESA: JBS S/A	DATA DA ELABORAÇÃO DO PLANO DE AÇÃO: 02/03/2015	DATA DA MISSÃO: 25/09/2014
Nº DO SIF: 337	RESPONSÁVEL PELA AUDITORIA: SIPOA/DDA/SFA-SP	

Itens	Não Conformidade	Medidas Corretivas	Medidas Preventivas	Prazo de Atendimento ¹	Verificação ²
10/51	<p>Câmara de Matéria-prima resfriada do setor de Carne Cozida Congelada: Foi observada presença de cestos com sacos plásticos (forro) rasgados com consequente exposição do produto em contato com a superfície do cesto metálico (não como superfície de contato com alimento)</p> <p>Seção 10.2 Circular Nº 175/2005/CGPE/DIPOA.</p>	De imediato a matéria prima que estava em contato direto com o cesto foi separada e enviada para graxaria. Foram alocados as matérias primas para outros cestos contendo 2 sacos plásticos, para garantir que o produto não entre em contato com os cestos. A matéria prima não foi utilizada para produção de USA.	Substituir o saco plástico que reveste os cestos com matéria prima utilizada atualmente com código 189544 (100 micras) pelo código 21750 (120 micras), ou seja, essa espessura evita que os sacos rasguem com facilidade e consequentemente diminui a contaminação por superfícies de contatos nos cestos aramados. O código com 100 micras foi bloqueado no sistema para evitar a compra accidental do insumo.	<p>A.C.: Imediato</p> <p>A.P.: 09/10/14</p>	<p><i>Corrigido AC. medida tomada 9/10/14</i></p>
40/51	<p>Abate: Deficiência de iluminação em uma plataforma de inspeção do DIF (220 Lux) do qual é requerido pela legislação 540 lux.</p> <p>Movimentação: Deficiência de iluminação em corredor de entrada para Câmaras de quartos (20 Lux) do qual é requerido pela legislação 110 lux.</p> <p>Seção 3.c. Circular Nº 175/2005/CGPE/DIPOA.</p>	<p>Instalar mais uma luminária na plataforma do DIF para melhorar a iluminação. Ação realizada de imediato</p> <p>Melhorar iluminação no corredor do corte, instalando mais luminárias. Ação realizada de imediato.</p>	Após instalação da nova luminária, foi realizada a inspeção do lux no ponto citado e evidenciado a conformidade.	<p>A.C.: 25/09/14</p> <p>A.P.: 25/09/14</p>	<p><i>Corrigido no mesmo dia</i></p>
48/51	<p>Continha matéria prima crua, em uma embalagem plástica de produto cozido com estampa do SIF 337 na embalagem, em uma bandeja Vermelha do qual essa seria para descarte de produtos não comestíveis. Para evitar a perda da identificação do produto, deveria estar alocado em sacos de materiais condenados ou embalagens de produtos não comestíveis para a correta eliminação do mesmo.</p> <p>Seção 10.1 Circular Nº 175/2005/CGPE/DIPOA.</p>	De imediato a matéria prima para descarte foi alocada diretamente em bandeja vermelha que apropriada para este fim.	Solicitar a compra de embalagem especifica para uso de produtos não comestíveis. Orientar os colaboradores responsáveis pelo procedimento.	<p>A.C.: Imediato</p> <p>A.P.: 26/09/14</p>	<p><i>Corrigido</i></p>

Lutz Cesar Bom
Fiscal Federal Agrotécnico
Carteira Fiscal nº 2035 / Médico Veterinário
CRMV-SP-422 - SIPOA / DDA / SFA / SP

Legenda:

- 1- O prazo de atendimento deve conter **dia/mês/ano**.
- 2- Espaço para que o encarregado do SIF acompanhe a execução do cronograma usando o campo de verificação para registrar a data de real atendimento do prazo estipulado no plano de ação e a medida tomada pelo SIF em caso de não conformidade.

A.C.: Prazo Ações Corretivas **A.P.:** Prazo Ações Preventivas


Assinatura do Representante da Empresa

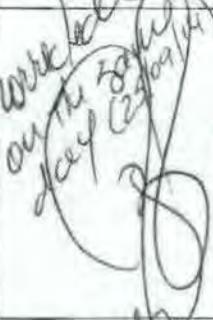
Mozart Ribeiro de Araújo Jr.
Gerencia Administrativa


Carimbo e Assinatura do Encarregado

Luiz Cesar Bom
Fiscal Federal Agropecuario
Carteira Fiscal nº 2935 / Médico Veterinário
CRMV-SP 1222 - SIPOA / DCA / SFA / SP

ACTION PLAN THE FOLLOWING NON-COMPLIANCES WERE IDENTIFIED BY FSIS AUDITOR DURING THE VETERINARY MISSION BY FSIS/USDA

ESTABLISHMENT NAME/LOCATION/CONTRY: JBS S/A / Lins -São-Paulo / Brazil	ACTION PLAN DATE: 03 rd March/2015	AUDIT DATE: 09 th Sept/2014
ESTABLISHMENT NO: SIF 337	NAME OF AUDITOR : Dr. Alexander L. Lauro – FSIS/USDA	

Number	Non-Compliance	Corrective Action	Preventive Action	When ¹	Verification ²
10/51	Several crates used to store raw materials for the production of cooked beef were observed with exposed product. The plastic liners were broken, and the product was touching the metal bars of these crates (not considered a product contact surface). Upon identification of the issue by the auditor, the establishment took immediate corrective action by isolating and disposing of the exposed product, and committed to using double liners in all future crates until a definitive solution could be reached (e.g., purchasing of thicker linings, modification of crates to avoid puncturing of liners) [section 10.2 of Brazilian regulation No. 175/2005/CGPE/DIPOA].	Immediately the raw material that was in direct contact with the metal was separated and sent to rendering plant. The raw materials involved were transferred to other crates containing two plastic bags, to ensure that the product does not come into contact with the metal. The raw materials involved was not used for production USA.	Replace the plastic bag that covers the crates of raw material. The current code 189544 (100 microns) will be replaced by the code 21750 (120 microns), ie, the thickness will prevent the bags easily tearing and thus decrease the contact with the surface. The code of 100 microns is now blocked in the system to prevent accidental purchase of raw material.	C.A.: Immediately P.A.: 09 th Oct/2014	
40/51	Several lighting non-compliances were noted. One inspection station did not meet the requirement of 540 lux. In addition, many of the carcass transit areas did not meet the requirement of 110 lux [section 3.c. of Brazilian regulation No. 175/2005/CGPE/DIPOA].	Install another lamp in the DIF platform to improve lighting (Action taken immediately). Improve the lighting in the hallway of the carcasses cut session, installing more lights along it (Action taken immediately).	After installation of the new luminaire lux level inspection was carried out in that point and was evidenced compliance.	C.A.: Immediately P.A.: Immediately	
48/51	A cooking bag, partially-filled with raw meat and bearing the mark of inspection, was inappropriately disposed of in a container used for inedible materials. In order to avoid the potential loss of identity of condemned materials, the meat should have been removed from the cooking bag prior to disposal [section 10.1 of Brazilian regulation No. 175/2005/CGPE/DIPOA].	Immediately, the raw material for disposal was allocated directly into red tray which is suitable for this purpose.	Will be prompted to supply session to purchase packaging specific to use of nonfood products. Guide this new procedure to employees who are responsible for the procedure.	C.A.: Immediately P.A.: 26 th Sept/2014	 

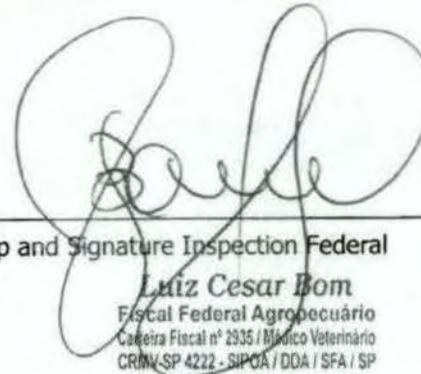
Legend:

- 1- DeadLine of the Corrective **(C.A.)** and Preventive action **(P.A.)** - **DD/MMM/YYYY**.
- 2- The Inspection Federal Check out if the Corretive and Preventive Action had already done of the period stipulated in the action plan



Stamp and Signature of Company Legal Representative

Mozart Ribeiro de Araújo Jr.
Gerencia Administrativa

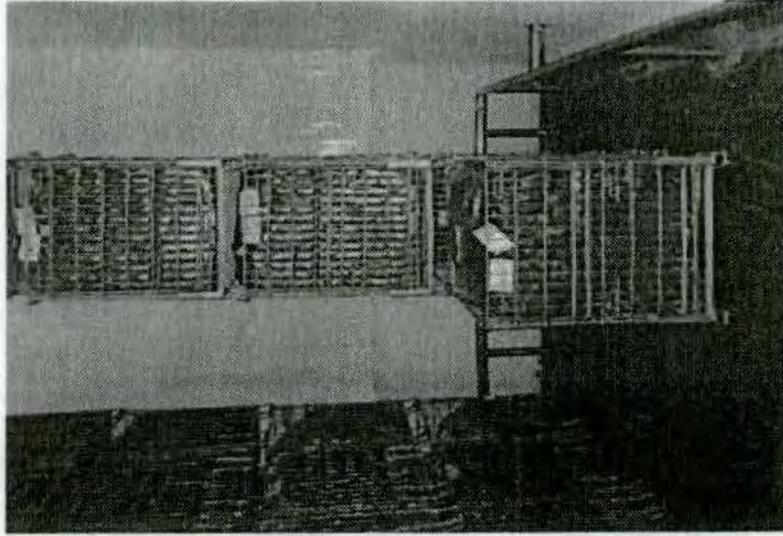


Stamp and Signature Inspection Federal

Luiz Cesar Bom
Fiscal Federal Agropecuário
Cadeira Fiscal nº 2935 / Médico Veterinário
CRMV-SP 4222 - SIPOA / DDA / SFA / SP



No 10/51





No 10/51

Enviar Cc...
Assunto: ENC: Alteração do saco plástico

De: Marcos Aurelio Tavares Roque [mailto:marcos.roque@jbs.com.br]
Enviada em: quarta-feira, 5 de novembro de 2014 08:40
Para: Maria Serikawa
Assunto: RES: Alteração do saco plástico

Dia 09/10/2014 foi bloqueado para compras o código 189544 (100 micras) e direcionado para compras do código 21750 (120 micras).

At,

	Marcos Roque	Av. Marginal Direita do Tietê, 500
	■ Diretoria Técnica	Vila Jaguara - São Paulo - SP
	① Gerência de P&D	CEP- 05118-100
	✉ marcos.roque@jbs.com.br	Fone: 55 11 3144 - 4615 Cel: 55 11 98530 - 9983 www.jbs.com.br

Conheça a P&D

De: Maria Serikawa [mailto:maria.serikawa@jbs.com.br]
Enviada em: quarta-feira, 5 de novembro de 2014 08:30
Para: 'Marcos Aurelio Tavares Roque'
Assunto: Alteração do saco plástico

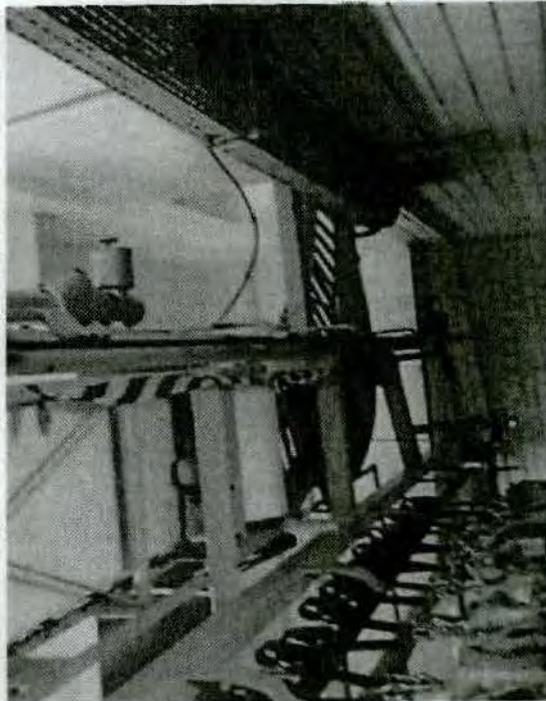
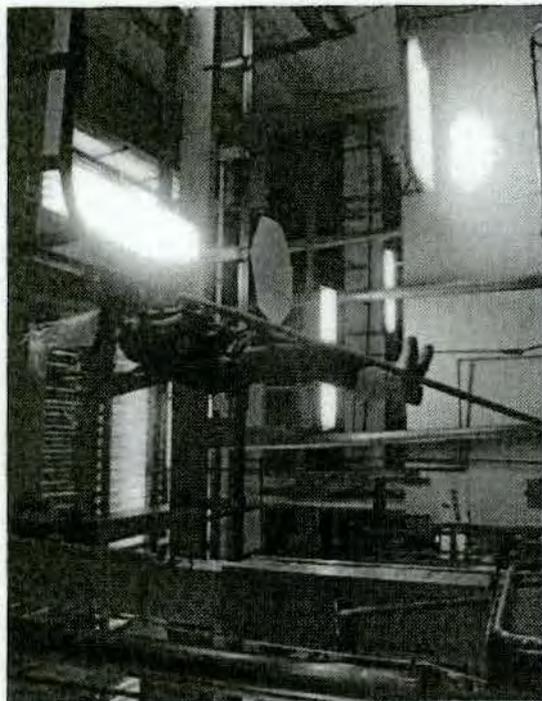
Marcos, bom dia

Sobre a alteração da espessura dos sacos usados no cesto de matéria-prima, NC deixada pela Missão Americana em Lins, já foi realizada?

Att

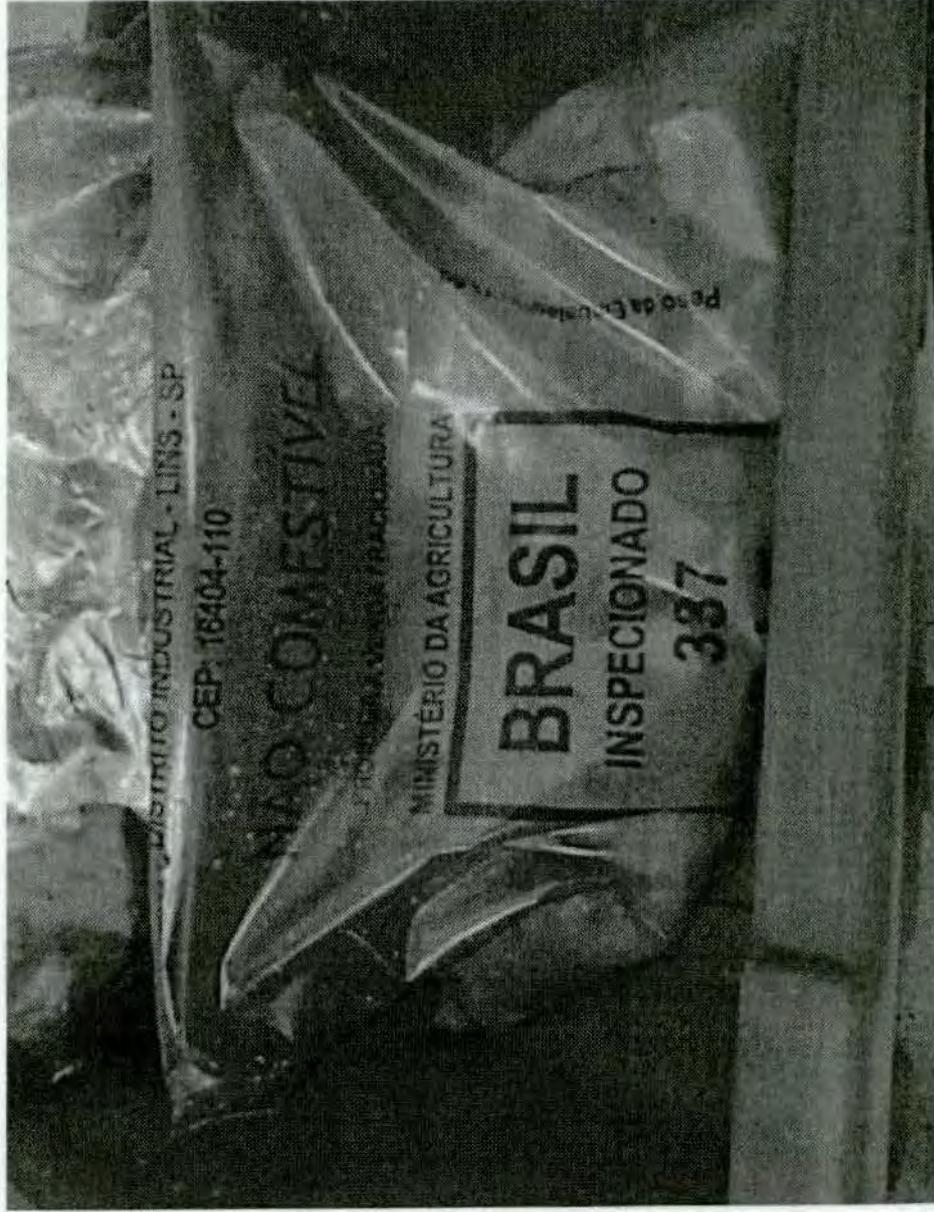


No 40/51





No 48/51





MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO
SUPERINTENDÊNCIA FEDERAL DE AGRICULTURA NO ESTADO DE SÃO PAULO - SFA-SP
SERVIÇO DE INSPEÇÃO DE PRODUTOS DE ORIGEM ANIMAL EM SÃO PAULO - SIPOA
UNIDADE TÉCNICA REGIONAL AGROPECUÁRIA UTRA / MARILIA
SERVIÇO DE INSPEÇÃO FEDERAL - SIF 337

Em : 04 / 03 / 2015

Memorando nº: 034 / 337/ 15

Do: FFA Encarregado do SIF 337 - Lins - SP

Ao: Sr. Chefe do SIPOA/DDA/SFA-SP

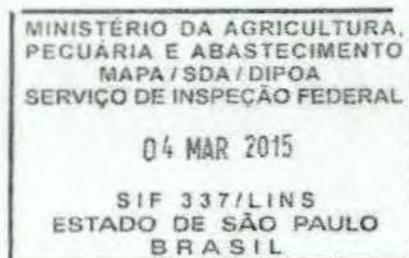
Assunto: Reforma de instalações e substituição de equipamentos.

Pelo presente, vimos encaminhar a V.S^a. para avaliação e devidos fins, o Plano de ação elaborado pela empresa JBS S/A sob este SIF 337, em atendimento ao "Audit Checklist" elaborado pela missão do FSIS/USDA em visita a este estabelecimento na data de 25/09/2014.

A correção dos itens citados foi executada no mesmo dia da auditoria e demonstrado com fotos ao Auditor que considerou satisfatória; as evidências seguem anexo.

O mesmo segue na versão português e Inglês.

As considerações superiores.



Atenciosamente.

Luiz Cesar Bom
Fiscal Federal Agropecuario
Carteira Fiscal nº 2935 / Médico Veterinário
CRMV-SP 4222 - SIPOA / DDA / SFA / SP

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Ferreira International Ltda. Tres Rios (Rio de Janeiro)	2. AUDIT DATE 9/19/2014	3. ESTABLISHMENT NO. SIF 13	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Dr. Alexander L. Lauro		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Est.#: SIF 13

City and Country: Tres Rios, Brazil

Date: 9/19/2014

The following non-compliances were not identified by Brazilian inspection officials during the establishment review:

15/51. The hazard analysis addressing the production of dried beef did not accurately identify the potential hazards associated with the stabilization of product. This document did not address the possible germination and subsequent toxin production of spore forming organisms such as *Clostridium perfringens* after the cooking/drying phase. As there is a CCP in place to ensure that the final product presents a water-activity inferior to 0.82, it is unlikely that conditions would allow for toxins from these organisms to be produced. However, failure to address all possible hazards at this step does not meet the regulatory requirements of section 14 of Brazilian regulation No. 175/2005/CGPE/DIPOA.

In addition, the FSIS auditor noted the following findings related to the implementation of Brazil's inspection system:

36. The establishment was incorrectly registered and approved by DIPOA for processes it no longer maintained the necessary equipment to conduct, including thermal processing and the production of frozen cooked beef. This is not in accordance with Articles 20 to 76 of Brazil's *Regulations for the Inspection of Industrial Sanitation for Products of Animal Origin* (RIISPOA), which require that the Federal Inspection Service maintain an accurate listing of products for all registered establishments.

57. Periodic supervisory reviews were not conducted at the intended frequency. During the period ranging from January to August 2014, only three supervisory reviews (March, May, and August) were conducted at this establishment. The instructions contained in *Official Circular No 27 /2009/DIPOA* prescribe a bi-monthly frequency for these reviews, for which a minimum of four supervisory visits should have been conducted within this eight month period.

61. NAME OF AUDITOR

Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE

FERREIRA
INTERNATIONAL LTDA

Três Rios, 06 de março de 2015

Ofício nº 009 /2015

Ao Sr. Fiscal Federal Agropecuário – Encarregado SIF 13

Assunto: Resposta ao relatório de Auditoria dos Estados Unidos realizada no dia 19/09/2014.

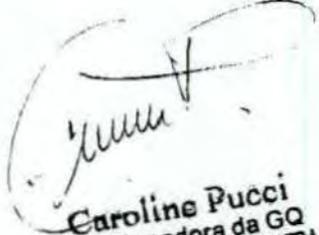
Segue anexo plano de ação referente às não conformidades apontadas em relatório de Auditoria dos Estados Unidos realizada pelo dr. Alexander L. Lauro realizada no dia 19 de setembro 2014.

Atenciosamente,

Recebi em
06.03.2015

Mh.

ANTÔNJO GOMES NETO
Ag. Insp. Sanit. Prod. Orig. Animal
MAPA - DFA/RJ - SIAPE 0018170
Responsável Federal Agropecuária


Caroline Pucci
Coordenadora da GQ
FERREIRA INTERNATIONAL LTDA

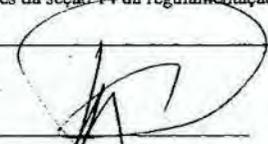
FERREIRA

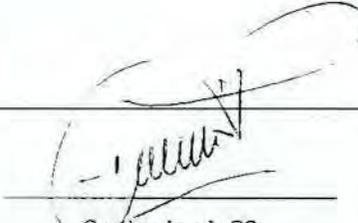
INTERNATIONAL LTDA

ACTION PLAN relating to non-compliances identified in the United States Audit Report conducted by Dr. Alexander L. Lauro on September 19th 2014 in the establishment under SIF # 13 in Três Rios - Ferreira International Ltda.

PLANO DE AÇÃO referente às Não Conformidades apontadas no Relatório da Missão dos Estados Unidos da América realizada pelo Médico Veterinário Lauro Alexandre no dia 19 de Setembro de 2014 no estabelecimento sob SIF nº 13 em Três Rios - Ferreira International Ltda.

Item Item	Description of Non Conformity Descrição da Não Conformidade	Corrective and Preventive Actions Ações Corretivas ¹ / Preventivas ²	Deadline Prazo	Status
1	<p><i>The hazard analysis addressing the production of dried beef did not accurately identify the potential hazards associated with the stabilization of product. This document did not address the possible germination and subsequent toxin production of spore forming organisms such as Clostridium perfringens after the cooking/drying phase.</i></p> <p><i>As there is a CCP in place to ensure that the final product presents a water-activity inferior to 0.82, it is unlikely that conditions would allow for toxins from these organisms to be produced. However, failure to address all possible hazards at this step does not meet the regulatory requirements of section 14 of Brazilian regulation No. 175/2005/CGPE/DIPOA</i></p> <p>A análise de risco abordando a produção de carne desidratada não identificou com precisão os riscos potenciais associados com a estabilização do produto. Este documento não aborda a possível germinação e posterior produção de toxinas da formação de esporos por organismos, tais como <i>Clostridium perfringens</i> após a fase de cozimento / desidratação.</p> <p>Como não existe um PCC no local para garantir que o produto final apresenta uma atividade de água inferior a 0,82, é pouco provável que estas condições permitam a produção destas toxinas a partir destes organismos. No entanto, a incapacidade de solucionar todos os perigos possíveis nesta etapa não cumpre os requisitos regulamentares da seção 14 da regulamentação brasileira nº 175/2005 / CGPE / DIPOA.</p>	<p><i>Review the HACCP Plan in order to include the hazard analysis for Clostridium perfringens in the stabilization step.</i></p> <p>Revisar o Plano HACCP para incluir o análise do perigo de <i>Clostridium perfringens</i> na etapa de Equalização (resfriamento)</p>	<p>March 06th, 2015</p>	<p>Concluded Concluído</p>

Gerente Industrial

 Leonardo José Fandrich Dias
 Plant Manager
 FERREIRA INTERNATIONAL LTDA

Coordenadora da GQ

 Caroline Pucci
 Coordenadora da GQ
 FERREIRA INTERNATIONAL LTDA

Etapa do Processo	Perigos Introduzidos, Controlados ou Aumentados Nesta Etapa	Probabilidade	Severidade	Medidas de Controle	Justificativa	Q0	Q1	Q2	Q3	Q4	Q5	Etapa onde o Perigo é Reduzido ou Eliminado	Modificação	PCC	
					<p><i>L. monocytogenes</i>: Em geral, o consumo de alimentos contaminados com <i>L. monocytogenes</i> pode causar Listerioses, que pode resultar em doença humana grave (Ryser 1999). A cada ano, a <i>L. monocytogenes</i> causa cerca de 2.500 casos de Listerioses de origem alimentar, incluindo cerca de 500 mortes (Mead, 1999) Cit in FSIS Risk Assessment for <i>Listeria</i> in Deli Meats, USDA, 2033);</p> <p><u><i>C. perfringens</i> (cepas do tipo C) causam enterite necrótica, muito mais rara, é classificada no grupo de risco IB, que inclui as doenças "de severo perigo para a população restrita, representando ameaça de morte, sequelas crônicas ou longa duração (cit in Silva et AL 2010)".</u></p>										
	Q -Perigo não identificado	-	-	-	-	-	-	-	-	-	-	-	-	-	

Q

Etapa do Processo	Perigos Introduzidos, Controlados ou Aumentados Nesta Etapa	Probabilidade	Severidade	Medidas de Controle	Justificativa	Q0	Q1	Q2	Q3	Q4	Q5	Etapa onde o Perigo é Reduzido ou Eliminado	Modificação	PCC	
4. Equalização Resfriamento)	B - Contaminação cruzada por microrganismos patogênicos (<i>E. coli</i> , <i>Salmonellaspp.</i> , <i>S. aureus</i> , <i>Listeriamonocytogenes</i> , <i>Clostridium perfringens</i>) presentes no ambiente e/ou durante a manipulação (movimentação dos carros); - <i>Clostridium perfringens</i> : devido a sobrevivência de células viáveis e/ou esporos após o processo térmico que germinam e se multiplicam devido a abuso de temperatura	B	M/ A	- Atendimento ao Programa Sentinela-Monitoramento de <i>Listeria</i> spp (PRG-13-GQ-022); - Treinamento dos operadores nas Boas práticas de fabricação; - Funcionários aptos à manipulação de alimentos através de avaliação médica; - Cumprimento do PPHO (PRG-13-GQ-008-PPHO), com a higienização correta do ambiente; - Etapa de processamento térmico anterior com alta letalidade e controle do tempo de equalização (resfriamento) - (PLAN-13-PRD-001)-Controle de Processo Térmico; - Controle da atividade de água do produto após a equalização / antes da embalagem (análise fria);	Probabilidade Baixa: - Devido ao cumprimento das Boas práticas de fabricação por parte dos operadores, PPHO, conformidade dos resultados de <i>Listeria</i> em ambiente e atividade de água do produto $\leq 0,82$ - Um limite crítico de atividade de água igual a 0,85 ou menor, deve controlar o crescimento de todas as bactérias patogênicas como também bolores para produtos estocados em aerobiose, (ICMSF, 1996) cit in FSIS, Compliance Guideline for Meat and Poultry Jerky Produced by Small and Very Small Establishments, 2012. - Controle do tempo de equalização (resfriamento); Severidade Média: <i>S. aureus</i> : São classificados pela ICMSF, 2002 no grupo de risco III, que inclui as doenças de perigo moderado, usualmente de curta duração e sem ameaça de morte ou sequelas, com sintomas auto limitados mas que provocam severo desconforto (cit in Silva et AL 2010)". Severidade Alta: <i>E. coli</i> e <i>Salmonella</i> são classificadas pela ICMSF, 2002, no grupo de risco I A, que inclui as doenças de "severo perigo para a população em geral, apresentam risco de morte, sequelas crônicas ou longa duração";	S	-	-	-	-	-	-		N	N

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Marfrig Alimentos S/A Paranatinga (Mato Grosso)	2. AUDIT DATE 9/17/2014	3. ESTABLISHMENT NO. SIF 2500	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Dr. Alexander L. Lauro		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Est.#: SIF 2500
City and Country: Paranatinga, Brazil
Date: 9/17/2014

The following non-compliances were not identified by Brazilian inspection officials during the establishment review:

19/51. The establishment did not routinely include the time of entry for the element of records review within their HACCP verification procedures for the "zero-tolerance" (contamination by feces and ingesta) CCP [Section 14 of Brazilian regulation No. 175/2005/CGPE/DIPOA].

47/51. Establishment employees were observed entering restrooms with their work uniforms. No additional measures were observed to protect the surfaces of these uniforms so as to minimize potential product contamination (e.g., use of protective covering in the restrooms, or in the production areas). [Section 2 of Brazilian regulation No. 175/2005/CGPE/DIPOA].

In addition, the FSIS auditor noted the following related to the implementation of Brazil's inspection system:

58. While observing the removal of tonsils in association with the establishment's SRM control program, the auditor noted that this was limited only to those of the palatine area, and that lingual tonsils were not removed. Subsequent conversations with DIPOA inspection officials indicated that this was compliant with the Brazilian domestic requirements for SRM removal. Beef tongues are not currently imported to the U.S. from Brazil (neither whole, in part, nor included in product formulation).

61. NAME OF AUDITOR
Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE

Plano de Ação para Correção de Não-Conformidades Apontadas em Missão dos Estados Unidos da América

ESTABELECIMENTO: Marfrig Global Foods S.A.

SIF: 2500

AUDITOR: Dr. Alexander L. Lauro

PERÍODO DA MISSÃO: 17/09/2014

ITENS	NÃO CONFORMIDADES	MEDIDAS CORRETIVAS	MEDIDAS PREVENTIVAS	PRAZO DE ATENDIMENTO	VERIFICAÇÃO
9 - Higiene e hábitos higiênicos dos funcionários	47/51. Funcionários do Estabelecimento foram observados entrando nos banheiros com seus uniformes de trabalho. Não foram observadas medidas adicionais para proteger as superfícies destes uniformes, de modo a minimizar a contaminação potencial do produto (por exemplo, o uso de cobertura protetora nos banheiros, ou nas áreas de produção). [Seção 2 do Regulamento Brasileiro n° 175/2005/CGPE/DIPOA].	Os hábitos higiênicos dos funcionários são embasados nas legislações brasileiras (Circulares, Normativas e RII/SPOA). Nestas legislações não se preconiza a troca de uniformes para a entrada nos sanitários.	Treinamento com os colaboradores da fábrica, para enfatizar os cuidados que devem ser tomados ao adentrarem aos sanitários para minimizar a contaminação do produto. Todas as alterações de legislações serão imediatamente cumpridas no estabelecimento.	M.C.: --- M.P.: 04 a 10/03/15	medida prevent. UF dentro do prazo. Antônio Franco B. J. Fiscal Federal Agropecu. Mód. Vel. - CRMV 9.101 Encarregado do SIF 2500
14 - APPCC	19/51. O estabelecimento não inclui rotineiramente no momento da entrada para o elemento de registros de avaliação dentro de seus	1- Não aplicável	1- Revisar o Programa APPCC para acrescentar na planilha de verificação documental	M.C.: --- M.P.: 18/10/2014	medida preventiva atendida Antônio Franco B. J. Fiscal Federal Agropecu. Mód. Vel. - CRMV 9.1 Encarregado do SIF 2


Carimbo e assinatura do responsável pela empresa

Carimbo e assinatura do responsável pela empresa


Carimbo e assinatura do responsável pelo SIF

Carimbo e assinatura do responsável pelo SIF

	<p>procedimentos de verificação do sistema HACCP para a "tolerância zero" (contaminação por fezes e ingesta) CCP [Seção 14 do Regulamento Brasileiro nº 175/2005/CGPE/DIPOA].</p>		<p>de registros de monitoramentos dos PCCs o horário de realização desta verificação.</p>		
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Francisco Adenir de Batista Silva
Gerente Industrial

Carimbo e assinatura do responsável pela empresa

Antônio Franco B. Filho
Fiscal Federal Agropecuario

Carimbo e assinatura do responsável pelo SIF

Plano de Ação para Correção de Não-Conformidades Apontadas em Missão dos Estados Unidos da América

ESTABELECIMENTO: Marfrig Global Foods S.A.

SIF: 2500

AUDITOR: Dr. Alexander L. Lauro

PERÍODO DA MISSÃO: 17/09/2014

ITENS	NÃO CONFORMIDADES	MEDIDAS CORRETIVAS	MEDIDAS PREVENTIVAS	PRAZO DE ATENDIMENTO	VERIFICAÇÃO
1- Inspeção <i>ante e post-mortem</i> (execução das técnicas)	58. Enquanto observa a remoção das amígdalas, em associação com o programa de controle de MRE do estabelecimento, o auditor observou que esta foi limitada apenas aos da região palatina, e que as tonsilas linguais não foram removidos. Conversas posteriores com os serviços de inspeção DIPOA indicou que este era compatível com as necessidades internas brasileiras para a remoção de MRE. Línguas da carne não são atualmente importados para os EUA a partir de Brasil (nem todo, em parte, nem incluído na formulação do produto).	Conforme já relatado, os procedimentos de Material de Risco Específico são embasados nas legislações brasileiras, Circular 463/Dipoa, Circular 876/Dipoa, nestas legislações não se preconiza a remoção das tonsilas linguais.	Maiores informações poderão ser esclarecidas com o DIPOA em Brasília.	M.C.: --- M.P.: ---	


Antônio Franco B. Filho
 Fiscal Federal Agropecuário
 Méd. Vet. - CRMV 9.1013

Carimbo e assinatura do responsável pelo SIF



MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO
Superintendência Federal de Agricultura, Pecuária e Abastecimento em Mato Grosso
SIPOA/DDA/SFA-MT

Várzea Grande – MT, 05/03/2015.

Informação: 085/2015/BOVINOS/SIPOA/DDA/SFA-MT.

Origem: Superintendência Federal de Agricultura em Mato Grosso.

Interessado: Marfrig Global Foods S/A – SIF 2500

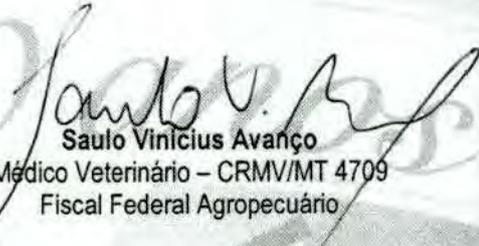
Assunto: Plano de ação referente ao Relatório de Auditoria EUA

Trata-se da avaliação pelo SIPOA/MT do plano de ação apresentado para correção das não conformidades descritas no Relatório de Auditoria EUA.

Após análise, informamos que esta área técnica é de parecer favorável ao plano, no entanto sugerimos a apreciação do DIPOA em relação a não remoção das tonsilas linguais durante o procedimento de inspeção *post-mortem* da língua, conforme apontamento do Auditor. A circular N° 463/DCI/DIPOA, bem como o Memo Circular CGI/DIPOA N° 001/2007, preconizam a retirada das amídalas de animais de qualquer idade. Cabe esclarecer se as amídalas referem-se a todas as tonsilas presentes na base da língua (palatinas e linguais) ou apenas às tonsilas palatinas. Cabe observar ainda que a Diretiva FSIS 6100.4, divulgada através da Circular N°876/2007/CGPE/DIPOA, preconiza a retirada de tonsilas palatinas e linguais.

Sugerimos o encaminhamento desta Informação à DDA com vistas à DICAR/CGI/DIPOA para conhecimento e demais deliberações.

Atenciosamente,


Saulo Vinícius Avanço
Médico Veterinário – CRMV/MT 4709
Fiscal Federal Agropecuário

De acordo,
À DDA com vistas à DICAR/CGI/DIPOA para conhecimento e demais deliberações.


Leandro José Machado
Fiscal Federal Agropecuário
Médico Veterinário - CRMV/MT 3298
Cidade de SIPOA/DDA/SFA-MT

SVA

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Pampeano Alimentos S/A Hulha Negra (Rio Grande do Sul)	2. AUDIT DATE 10/1/2014	3. ESTABLISHMENT NO. SIF 226	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Dr. Alexander L. Lauro		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Est.#: SIF 226

City and Country: Hulha Negra (Rio Grande do Sul), Brazil

Date: 10/1/2014

The following non-compliances were not identified by Brazilian inspection officials during the establishment review:

16/51. Establishment records documenting the monitoring of the three-prong CCP (oven temperature, relative humidity, and product temperature) related to the production of beef jerky did not include the time which each entry occurred [Section 14 of Brazilian regulation No. 175/2005/CGPE/DIPOA].

61. NAME OF AUDITOR

Dr. Alexander L. Lauro

62. AUDITOR SIGNATURE AND DATE



04 March 2015

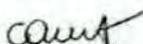
United States Department of Agriculture
Food Safety and Inspection Service

Regarding to Foreign Establishment Audit Checklist received on March 02nd, 2015 please see below the action taken to correct the non-compliance.

Non-compliance	Corrective Action	Date
Establishment records documenting the monitoring of the three-prong CCP (oven temperature, relative humidity and product temperature) related to the production of beef jerky did not include the time which each entry occurred [Section 14 of Brazilian regulation No. 175/2005/CGPE/DIPOA]	The monitoring record RHAU 002/SIF226 was reviewed. It is monitored the initial, final and total time of each oven, humidity and product temperature, and the inspector sign every each monitoring. Please see attachment A1.	October 02 nd , 2014

If you require any other information, please do not hesitate to contact us.

Kind regards,


Camila Sant'Anna
camila.anna@marfrig.com.br
Quality Assurance Supervisor


Marcos Fernandes
marcos.fernandes@marfrig.com.br
Industrial Manager



Unidade Hulha Negra:
Pampeano Alimentos S.A.
Estação Santo Antônio, Km 32
CEP: 96.460-000
Hulha Negra - RS - Brasil
Tel: 55 53 3249 1500

marfrig.com.br



Registro do Sistema de Gestão
de Segurança de Alimentos
Unidade

MONITORAMENTO E VERIFICAÇÃO CONTROLE DO TRATAMENTO TÉRMICO BJ PCC 4B

CÓDIGO
RHAU 002/SIF 226
DATA DE EMISSÃO
04/2010
DATA DE REVISÃO
10/2014
Nº REVISÃO
011

Data: ___/___/___ Produto: _____

Estufa	Lote	Temperatura da estufa <small>Mínimo 77°C por 60 minutos</small>			Rubrica	Umidade relativa da estufa <small>Mínimo 27% por 60 minutos</small>			Rubrica	Temperatura interna do produto <small>Mínimo 72°C por 1 minuto</small>			Rubrica
		Hora inicial	Temperatura	°C		Hora inicial	Porcentagem	Hora inicial		Temperatura	°C		
		Hora final	Temperatura	°C	Hora final	Porcentagem	Hora final	Temperatura	°C	Tempo total			
		Hora inicial	Temperatura	°C	Hora inicial	Porcentagem	Hora inicial	Temperatura	°C	Hora inicial	Temperatura	°C	
		Hora final	Temperatura	°C	Hora final	Porcentagem	Hora final	Temperatura	°C	Hora final	Temperatura	°C	
		Tempo total			Tempo total		Tempo total			Tempo total			

Verificação PCC 4B

Procedimento: O auxiliar da Garantia da Qualidade deve acompanhar o tratamento térmico pelo controlador da estufa/computador, a hora inicial deve ser considerada a partir do momento em que a temperatura da estufa, umidade relativa e temperatura interna do produto forem atingidas, anotar o horário e a temperatura. Controlar os parâmetros e anotar novamente o horário e a temperatura da estufa, umidade relativa e temperatura interna do produto. O tempo mínimo de tratamento é de 60 minutos a 77° C. **Tomada de ação corretiva:** Se necessário estender o processo até que o tempo e a temperatura sejam atingidos.

Observações:

Auxiliar da Garantia da Qualidade

Auditor de documentos