



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

JUL 28 2011

MVZ. Octavio Carranza de Mendoza  
Director General  
Dirección General de Inocuidad Alimentaria, Acuicola y Pesquera (DGIAAP)  
Servicio Nacional de Sanidad, Inocuidad y Calidad Agroalimentaria (SENASICA)  
Secretaría de Agricultura, Ganadería, Desarrollo Rural, Pesca y Alimentación (SAGARPA)  
Guillermo Perez Valenzuela 127  
Colonia Del Carmen Coyoacan  
C.P. 04000, Mexico, D.F.

Dear Dr. Octavio Carranza de Mendoza,

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Mexico's meat and processed poultry inspection system September 22 through October 22, 2009. Enclosed is a copy of the final audit report. Comments received from the government of Mexico are included as an attachment to the final report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 690-5646, by facsimile at (202) 720-0676, or electronic mail at [andreas.keller@fsis.usda.gov](mailto:andreas.keller@fsis.usda.gov).

Sincerely,

Andreas Keller, PhD  
Acting Director  
International Audit Staff  
Office of International Affairs

Enclosure

cc:

W. Garth Thorburn II, Acting Minister-Counselor for Agricultural Affairs, US Embassy, Mexico City  
Daniel Williams II, Attaché, US Embassy, Mexico, D.F.  
Carlos Vazquez, Minister Counselor for Agricultural Affairs, Embassy of Mexico, Washington, DC  
Carlos Gonzalez, Senior Agricultural Attaché, US Embassy, Mexico City  
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Mexico Country File

JUL 28 2011

FINAL REPORT OF AN AUDIT CONDUCTED IN  
MEXICO

SEPTEMBER 22 - OCTOBER 22, 2009

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

Food Safety and Inspection Service  
United States Department of Agriculture

### *Executive Summary*

This report describes the outcome of an on-site audit of Mexico's meat and processed poultry inspection system conducted by the Food Safety and Inspection Service (FSIS) from September 22 through October 22, 2009.

The audit was an on-going equivalence verification audit with special emphasis on National Service for Animal Health, Food Safety, and Agricultural and Food Quality Assurance's (Servicio Nacional de Sanidad Inocuidad y Calidad Agroalimentaria or SENASICA) controls addressing enforcement of FSIS requirements and on the corrective actions implemented in response to the FSIS June/July 2008 audit. Between October 1, 2008 and September 30, 2009, Mexico exported 72,563,627 pounds of meat and processed poultry products to the United States.

Although the central competent authority (CCA) maintains the legal authority and the responsibility to enforce all applicable laws and regulations governing Mexico and third-country requirements, the auditors found that these requirements were not consistently applied throughout the system, as enforcement actions were initiated by the CCA in two of the 16 establishments audited, as follows:

- Two establishments were issued Notices of Intent to Delist (NOID) for conditions within the establishment that were not immediately rectifiable, yet did not pose an imminent threat to public health, and would warrant decertification if not corrected within thirty days from the time of issuance. FSIS received corrective actions taken by the establishment and verified by the CCA on October 27 and November 3, 2009, and the establishments were not decertified.

The audit findings raise significant concerns regarding the CCA's ability to provide sufficient oversight within their system. Principal areas of weakness included:

- SENASICA was not consistently assigning inspection personnel that were under the ultimate control and supervision of the Mexican government to provide regulatory oversight at establishments. In three of 16 establishments audited, some veterinarians conducting official inspection-related activities were hired and paid by the establishments, which is an indicator of possible conflict of interest. The CCA designed, and is implementing, a "third party" payment system to address this potential conflict of interest, which has a full implementation date of April 11, 2011.
- Inspection personnel at three of seven slaughter establishments were either deficient of knowledge, indicating a lack of training, or failed to implement official inspection post-mortem procedures. SENASICA implemented corrective actions by increasing training requirements, including providing additional on-line training, and tracking training accomplishments.
- One state supervisor, responsible for three separate states, was not using the "Annex", a checklist which contains the special sections concerning SSOP, HACCP, and microbiological testing requirements, to be completed during the review of the U.S. eligible establishments in conjunction with the periodic supervisory review form. This indicates lack of implementation of supervisory oversight in these three states. The CCA provided specific supervisory correlation to the state supervisor addressing the use of the Annex checklist.

In order for SENASICA to demonstrate on-going control of their system, FSIS requests that further evidence be provided to ensure the necessary steps to remedy the non-compliances identified during the audit have been taken.

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## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

BSE	Bovine Spongiform Encephalopathy
CCA	Central Competent Authority [Servicio Nacional de Sanidad Inocuidad y Calidad Agroalimentaria (SENASICA)]
CENAPA	National Center for Animal Health Diagnosis (Centro Nacional de Servicios de Constatación en Salud Animal)
CFR	United States Code of Federal Regulations
<i>E. coli</i>	Generic <i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
<i>Lm</i>	<i>Listeria monocytogenes</i>
NOID	Notice of Intent to Delist
OIRSA	International Regional Organization for Agricultural Health (Organismo Internacional Regional de Sanidad Agropecuaria)
POE	Ports-of-Entry
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point System
RTE	Ready-to-Eat
SAGARPA	Secretariat for Agriculture, Livestock, Rural Development, Fisheries and Food (Secretaria de Agricultura, Ganaderia, Desarrollo Rural, Pesca y Alimentacion)
<i>Salmonella</i>	<i>Salmonella</i> species
SENASICA	National Service for Animal Health, Food Safety, and Agricultural and Food Quality Assurance (Servicio Nacional de Sanidad Inocuidad y Calidad Agroalimentaria)
SRM	Specified Risk Materials
SSOP	Sanitation Standard Operating Procedures
TIF	Federal Inspection Type (Tipo Inspección Federal)

## 1. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture conducted an audit of Mexico's meat and processed poultry food safety system from September 22 through October 22, 2009.

The audit began with an entrance meeting held on September 22, 2009, in Mexico City with the participation of representatives from the Central Competent Authority (CCA) – National Service for Animal Health, Food Safety, and Agricultural and Food Quality Assurance (SENASICA) – and two auditors from the FSIS, Office of International Affairs.

## 2. BACKGROUND

Mexico is eligible to export raw and processed red meat products and processed poultry products to the United States. Between October 1, 2008 and September 30, 2009, Mexico exported 72,563,627 pounds of meat and processed poultry products to the United States of which 19,881,770 pounds were re-inspected at U.S. Ports-of-Entry (POE). A total of 74,077 pounds were rejected at POE, of which 45,510 pounds of that total were rejected because of microbiological verification sample failures for *E. coli* O157:H7 in ground beef.

As a result of these multiple positive results for *E. coli* O157:H7 in ground beef at POE, the audit scope was adapted to include the establishment that produced the raw ground product, as well as verify the regulatory oversight provided by CCA. The relevant findings are captured in Section 8 of this report.

The Mexican food safety system was audited by FSIS three times in the calendar year 2008: a routine audit was conducted in June/July; the first follow-up audit was conducted in September; and an additional follow-up audit was conducted in October. The findings of the June/July audit resulted in four Notices of Intent to Delist (NOID) and three establishments were delisted from those establishments eligible to export meat and processed poultry products to the United States. As a result of the audit findings, Mexico's CCA self-suspended all establishments' eligibility to export meat and processed poultry products to the United States in July of 2008. The audit identified significant findings in the following risk areas:

- *Government Oversight*: Lack of available documentation reflecting the performance and implementation of periodic supervisory reviews and the failure to enforce FSIS regulatory requirements. There was a lack of supervisory knowledge associated with the training needs of inspection personnel.
- *Sanitation Controls*: Failure to implement and verify sanitation programs consistently throughout the system, including non-compliances in verification of implementation and recordkeeping.
- *Slaughter/Processing Controls*: Failure to consistently implement and verify core HACCP regulatory requirements and failure to ensure adequate post-mortem inspection procedures.

### 3. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

The current audit objective was to ensure that Mexico's food safety system governing meat and poultry continues to be equivalent to that of the United States, with an inspection system designed to produce products that are safe, unadulterated, and properly labeled. The audit was an on-going equivalence verification audit with special emphasis on SENASICA's controls addressing enforcement of FSIS requirements and on the corrective actions implemented in response to the FSIS June/July 2008 audit. In pursuit of this objective, FSIS used a risk-based procedure to determine the audit scope, which included an analysis of country performance, production types and volumes, and POE testing results.

The FSIS auditors were accompanied during the entire audit by representatives from the CCA, and/or representatives from SENASICA state inspection offices, and/or the National Center for Animal Health Diagnosis (Centro Nacional de Servicios de Constatación en Salud Animal) (CENAPA). Program effectiveness determinations focused on government controls and oversight within five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP), (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis/Critical Control Point (HACCP) programs and a testing program for generic *Escherichia coli* (*E. coli*), (4) residue controls, and (5) enforcement controls, including a government verification testing program for *Salmonella* species.

Administrative functions were reviewed at the CCA headquarters, five state offices, and 16 local inspection offices, during which the auditors evaluated the implementation of those management control systems in place to ensure that the national system of inspection, verification, and enforcement was being implemented as intended.

Sixteen Federal Inspection Type (TIF) establishments were selected from a total of 40 establishments certified to export to the United States. During the establishment visits, particular attention was paid to 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 accordance with 9 CFR 327.2 and 381.196.

Additionally, four private microbiology laboratories and one government microbiology laboratory were audited to verify their ability to provide adequate technical support to the inspection system.

**Table 1: Audit Scope Summary**

Competent Authority Visits		Locations	
Competent Authority	Central Authority	1	Mexico City
	State Offices	5	Chihuahua, Sonora, Sinaloa, Veracruz, Nuevo León
Private Microbiology Laboratories		4	Central Regional Laboratory, Monterrey Analytica Noroeste, Hermosillo Primus Laboratory, Culiacan

		Sigma Alimentos, Atitaloquia
Government Microbiology Laboratory	1	CENAPA, reference laboratory, Jiutepec
Bovine Slaughter Establishment	1	Tamaulipas
Bovine Slaughter/Processing Establishments	5	Sinaloa, Veracruz, Nuevo León (2), San Luis Potosi
Swine Slaughter/Processing Establishments	1	Sonora
Beef Processing	3	Sinaloa, Chihuahua, Nuevo León
Pork Processing	1	Sinaloa
Meat/Poultry Processing Establishments	5	Sonora (3), Nuevo León (2)

#### 4. LEGAL BASIS FOR THE AUDIT AND AUDIT STANDARDS

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

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

The audit standards applied during the review of Mexico's meat and processed poultry 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 under provisions of the Sanitary/Phytosanitary Agreement, which include the following:

- Private laboratories analyze official samples for *Salmonella* spp and *Listeria monocytogenes* (*Lm*).
- *E. coli* O157:H7 National Testing Program
- The National Residue Control Program

#### 5. MAIN FINDINGS CONCERNING GOVERNMENT OVERSIGHT

FSIS import eligibility requirements dictate that the foreign inspection system be organized and administered by the national government of the exporting country and provide standards equivalent to those of the Federal system of meat and poultry inspection in the United States. For Mexico, the authority to enforce SENASICA inspection laws is granted in the Federal Law of Animal Health.

SENASICA, a division/service of the Secretariat for Agriculture, Livestock, Rural Development, Fisheries and Food (SAGARPA), is granted the authority to enforce inspection laws, and is responsible for regulating Mexico's meat and processed poultry inspection system and live-animal health requirements. This responsibility includes certifying and regulating TIF establishments for the exportation of meat and processed poultry products to the United States.

Although the CCA maintains the legal authority and the responsibility to enforce all applicable laws and regulations governing Mexico and third-country requirements, it was observed by the FSIS auditors that these requirements were not consistently applied throughout the system. As a result of the auditor's observations, and in conjunction with the CCA representative, enforcement actions were initiated in two of the 16 establishments audited, as follows:

- Two establishments were issued NOIDs for conditions within the establishment that were not immediately rectifiable. While the conditions did not pose an imminent threat to public health, they would warrant decertification if not corrected within 30 days from the time of issuance. FSIS received corrective actions taken by the establishment and verified by the CCA on October 27 and November 3, 2009, and the establishments were not decertified.

When an exporting certified establishment is issued an NOID or is delisted, it is because there is a significant question of process control or of basic sanitation within the facility. While FSIS expects these actions to occur in relation to the CCA's ongoing responsibilities for inspection and for oversight of its inspection personnel, these events carry a different significance when they occur within the context of an FSIS audit, as it calls into question why the conditions within a particular establishment have gone unchecked and escalated to the level where an enforcement action is necessary.

A component of FSIS' eligibility requirements is the need for *ultimate control and supervision by the national government over the official activities of all employees or licensees of the system (9CFR 327.2(a)(2)(i)(B))*. During the course of the audit, the following non-compliance was identified by the FSIS auditor in relation to the enforcement of U.S. requirements and SENASICA regulatory oversight:

- SENASICA was not consistently assigning inspection personnel who were under the ultimate control and supervision of the Mexican government to provide regulatory oversight at establishments that produced products exported to the United States. Some veterinarians working under the supervision of SENASICA and authorized by SAGARPA to perform non-official inspection tasks, were actually performing some official inspection-related activities. These veterinarians were hired and paid directly by the establishment. This constitutes a potential conflict of interest.

In three of 16 establishments audited, these veterinarians paid by the establishment were conducting official inspection-related activities. In two of the three establishments, the auditor observed that they were conducting post-mortem inspection-related procedures, and in the third establishment, records reviewed revealed that the veterinarian conducted the pre-operational inspection verification tasks.

Subsequent to the audit, SENASICA developed and is implementing a payment plan to meet this FSIS component. The plan involves payment administration through a "third party organization," the Animal Health Regional Organization (El Organismo Internacional Regional de Sanidad Agropecuaria or O.I.R.S.A.). The full implementation date is April 11, 2011.

Another component of FSIS' eligibility requirements is the need for *the assignment of competent, qualified inspectors*. SENASICA is responsible for the hiring, training, assigning, and overseeing of inspection personnel. During the course of the audit, the following non-compliances were identified as they relate to this subcomponent:

- Inspection personnel at three of seven slaughter establishments failed to implement official inspection post-mortem procedures such as head, viscera, and/or carcass inspection.
- One state supervisor was not using the Annex, a checklist which contains specific sections concerning SSOP, HACCP, and microbiological testing requirements to be completed during the review of the U.S. eligible establishments in conjunction with the periodic supervisory review form. This supervisor was responsible for TIF establishments in three Mexican states. The Annex is required to be used for the establishments exporting to the United States.

The nature, extent, and degree of the above audit findings indicate questionable government controls within the food safety system. The initial and on-going training programs, including training in post-mortem inspection procedures, provided by SENASICA were not totally effective. Inadequate training could result in inconsistent or inadequate execution of food safety responsibilities and thus pose a potential food safety hazard and impact public health.

## 6. SANITATION CONTROLS

The first of the five risk areas that the FSIS auditors reviewed was Sanitation Controls. The inspection system must contain requirements for sanitation, for sanitary handling of products, and for the development and implementation of sanitation standard operating procedures (SSOP).

Although the review of manuals and procedures at SENASICA's administrative offices indicated that the CCA continues to maintain equivalent legislative controls for sanitation, the actual conditions observed in some of the establishments were not entirely consistent with the corresponding documentation.

The auditors observed that both in-plant inspection personnel and individuals conducting supervisory reviews were not routinely carrying out the procedures as described in the SENASICA manuals and other official documents, and may have resulted in following findings:

- Lack of consistent identification of contaminated product and product-contact surfaces, and other insanitary conditions,
- Lack of consistent documentation of non-compliances in a manner that reflects actual establishment conditions,
- Lack of consistent monitoring of establishment written procedures including the handling of product in a sanitary manner,
- Lack of consistent establishment and SENASICA documentation of complete descriptions of non-compliances, corrective actions, and preventive measures.

Many of these findings are closely related to those identified during the June/July, 2008 audit. The regulatory actions taken by the CCA during the course of the audit were related to sanitation non-compliances; this emphasized the need for consistent application of controls within their food safety system.

## **7. ANIMAL DISEASE CONTROLS**

The second of the five risk areas that the FSIS auditors evaluated was Animal Disease Controls, including review of mechanisms for animal identification, control of condemned and restricted product, implementation of the requirements for non-ambulatory disabled cattle and specified risk materials (SRM), and procedures for sanitary handling of returned and reconditioned product. No findings were identified as a result of this audit, therefore indicating process control by the CCA.

## **8. SLAUGHTER/PROCESSING CONTROLS**

The third of the five risk areas that the FSIS auditors reviewed was Slaughter/Processing Controls, which included ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, implementation of HACCP systems in all establishments, and implementation of a testing program for generic *E. coli* in slaughter establishments.

The review of applicable legislation indicated that SENASICA continues to maintain sufficient written controls with respect to this risk area. However, system weaknesses regarding implementation and verification of HACCP systems within SENASICA were identified as described below:

- Inadequate implementation of basic elements of the HACCP plan, including ongoing verification procedures,
- Inadequate implementation of calibration activities,
- Inconsistent maintenance of appropriate records of monitoring, verification, and noncompliance, e.g., initialing of entries, recording of actual quantifiable values and actual times when the entries were made.
- As a result of the multiple positive results for *E. coli* O157:H7 in ground beef at POE, the audit scope was adapted to include the establishment that produced the raw ground product, as well as verify the regulatory oversight provided by the CCA. The corrective actions included an investigation performed by the establishment and overseen by the CCA, which determined the non-compliant products were slaughtered in another country and exported into Mexico. Additionally, the auditor verified the CCA oversight of the investigative process, which included a review of the results on Certificates of Analyses, a review of sampling methodologies, and a corporate audit of all suppliers of multi-sourced non-compliant product.

The auditors observed additional non-compliance in the implementation of SENASICA's Slaughter/Processing controls:

- There was a failure to document and correctly implement the SRM removal procedure for the distal ileum. The establishment and SENASICA were under the impression that the required length to be removed was 80 centimeters. This was immediately rectified and 80 inches are now removed. Other SRMs were appropriately removed in accordance with FSIS requirements. The auditor verified that no products containing the potential SRMs had been exported to the U.S.
- Several establishments' generic *E. coli* testing programs for the evaluation of results were conducted using excision criteria, but the sample collection was by sponging. One program lacked a provision for the selection of carcasses for sampling when the total number slaughtered in a day was more than 300 cattle.

## 9. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditors reviewed was Residue Controls. The inspection system must have a chemical residue control program, organized and administered by the national government, which includes random sampling of internal organs and fat of carcasses for chemical residues identified by the exporting country's meat and poultry inspection authority or by FSIS as contaminants.

As part of the verification methodology, the auditors' preparatory review of POE findings before going to Mexico did not identify concerns within this risk area. Subsequently, no government residue laboratories were reviewed. In addition, interviews with CCA personnel and the review of relevant records indicated that Mexico's residue control plan was being followed appropriately, therefore, demonstrating process control.

## 10. ENFORCEMENT CONTROLS

The last of the five risk areas that the FSIS auditors reviewed was Enforcement Controls. These controls included the enforcement of inspection requirements, the government and industry's verification testing programs for *Salmonella* spp, *E. coli* O157:H7, *Lm*, and species verification.

During the on-site audit, FSIS verified SENASICA *Lm* control measures in two establishments. Establishments producing Ready-to-Eat (RTE) products are required to adopt *Lm* control measures similar to FSIS' Alternatives 1, 2, and 3.

In accordance with the Annex, TIF establishments certified to export to the United States are required to have SENASICA monthly supervisory reviews. The Annex contains sections specific to SSOP, HACCP, and Pathogen Reduction Programs such as *Salmonella*, generic *E. coli*, *Lm* in RTE products, and Bovine Spongiform Encephalopathy (BSE)-SRM controls. The Annex was not consistently applied at establishments eligible to export to the United States. Additionally, SENASICA inspection system controls were found to be inadequate in post-mortem inspection procedures exhibited by some in-plant inspection personnel. These findings were previously discussed in Section 5, Main Findings Concerning Government Oversight.

With the exception of the generic *E. coli* programs addressed in Section 8, no non-compliances were identified concerning the testing programs for the relevant pathogens of concern.

Weaknesses associated with the enforcement of sanitation and HACCP requirements, the performance of supervisory reviews, and the assignment of inspectors have been duly noted in previous portions of this report.

## **11. EXIT MEETING**

An exit meeting was held in Mexico City on October 22, 2009, with SENASICA. At this meeting, the preliminary findings from the audit were presented by the FSIS auditors.

## **12. PROFFERED CORRECTIVE ACTIONS**

At the time of drafting of this report, SENASICA provided the following corrective actions to FSIS' audit findings:

### **Establishment Corrective Actions**

Immediately following the audit, SENASICA provided corrective action plans for those establishments with non-compliances including the two establishments which received an NOID. Additionally, SENASICA provided FSIS notification that the CCA had conducted verification reviews of the corrective actions of those two establishments which had received an NOID.

FSIS' analysis of those corrective actions demonstrated that the establishments had taken corrective actions in response to the FSIS findings in each of the two establishments that received an NOID.

### **Conflict of Interest – Payment of Veterinarians**

SENASICA has developed a corrective action plan to resolve the potential conflict of interest issue. This plan will transfer the payment of approved veterinarians currently working at authorized TIF establishments eligible to export to the United States into a payment process administered by a third party organization, O.I.R.S.A. FSIS has determined that the conflict of interest issue will be resolved if the plan is properly implemented. SENASICA's full implementation date is April 11, 2011.

## **13. CONCLUSIONS**

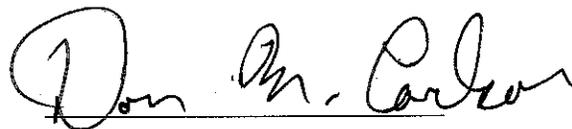
An analysis of prior systemic non-compliances within the context of the current audit findings indicates that while Mexico's food safety system has demonstrated the ability to take corrective actions in response to previously observed audit findings in order to improve their food safety system, more remains to be done. SENASICA implemented corrective actions by increasing training requirements, including providing additional on-line training, and tracking training accomplishments. The addition of on-line training materials provided by SENASICA headquarters and the required additional veterinarian training are welcomed system enhancements. Some classroom training has been scheduled by SENASICA headquarters; however budget cuts have curtailed this training.

Many of the non-compliances encountered during the 2008 and 2009 audits were repetitive in nature, the most significant of which included: failure to correctly implement SSOP, HACCP, and other sanitation non-compliances, insufficient documentation of inspection activities, interpretation of generic *E. coli* results, and inadequate post-mortem inspection procedures.

There were significant concerns with SENASICA's in-plant documentation of establishment non-compliances in HACCP and other sanitation issues. Additionally, there was a failure of supervisory oversight to detect these non-compliances. The CCA has yet to provide corrective actions demonstrating their regulatory oversight verification is adequate to prevent future repetitive non-compliances, including verification of these measures. FSIS requests that SENASICA provide documentation that verifies that these non-compliances have been addressed.

The current audit revealed another area of systemic concern in the system's design and implementation. This is the use of approved veterinarians paid by the establishment and involved in regulatory oversight in the establishment where they are employed. SENASICA has proposed, and is implementing significant actions, which, if adequately implemented and effectively executed, should correct that weakness. After the full implementation date of April 11, 2011, FSIS will request documentation verifying the payment system is functioning as intended.

Don Carlson, DVM  
Senior Program Auditor



Rori K. Craver, DVM  
Senior Program Auditor



#### 14. ATTACHMENTS

Foreign Country Response to the Draft Final Audit Report



United States  
Department of  
Agriculture

Office of  
Agricultural  
Affairs

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Mexico City

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July 27, 2011

Dr. Ronald K. Jones  
Assistant Administrator  
USDA, FSIS, OIA  
1400 Independence Ave. SW  
Room 3153-South Building  
Washington, D.C. 20250

Dear Dr. Jones:

Attached is official communication #B00.04.6428 dated July 26, 2011, signed by Agro-Food, Aquaculture and Fishery Safety General Director Dr. Octavio Carranza from The National Service of Health, Food Safety, and Food Quality (SENASICA). Through this letter, Dr. Carranza wishes to share with you the comments to the preliminary 2009 audit report that was conducted by official personnel from the Food Safety and Inspection Service, from September 22 through October 22, 2011, to the Mexican veterinary inspection system. We are providing a courtesy translation of the letter.

I take this opportunity to reiterate our willingness to continue to be an important partner in the working relationship between FSIS and SENASICA.

Sincerely,

W. Garth Thorburn II  
Acting Minister Counselor for  
Agricultural Affairs

Enclosures

SERVICIO NACIONAL DE SANIDAD, INOCUIDAD Y CALIDAD AGROALIMENTARIA  
DIRECCIÓN GENERAL DE INOCUIDAD AGROALIMENTARIA, ACUÍCOLA Y PESQUERA

OFICIO B00.04: 5428



SECRETARÍA DE AGRICULTURA,  
GANADERÍA, DESARROLLO RURAL,  
PESES Y ALIMENTACIÓN



2011, Año del Turismo en México

México D. F. a 26 de julio de 2011

**Dr. Ronald K. Jones**  
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Hago referencia al reporte preliminar de auditoría efectuada del 22 de septiembre al 22 de octubre de 2009 por personal oficial del Food Safety and Inspection Service (FSIS) al sistema de inspección veterinaria de México, con la finalidad de constatar equivalencia y cumplimiento de disposiciones normativas establecidas por la autoridad sanitaria de los Estados Unidos de América para permitir la exportación de productos y subproductos cárnicos a su país.

Sobre el particular atraigo su atención al hallazgo de auditoría en el que se señalan inconsistencias en la asignación de personal de inspección toda vez que se observó que en 3 de los 16 establecimientos auditados, algunos de los veterinarios que llevan a cabo las actividades de inspección y actividades relacionadas eran contratados y pagados por el establecimiento lo cual representaba un posible conflicto de interés.

Sobre el particular y con la finalidad de atender dicha observación, el SENASICA ha implementado las siguientes acciones:

- Formalización de la figura de Médico Veterinario Responsable Autorizado, en sustitución de la figura de Médico Aprobado, lo anterior con fundamento en la Ley Federal de Sanidad Animal.
- Coordinación entre el Servicio Nacional de Sanidad, Inocuidad y Calidad Agroalimentaria SENASICA y el Organismo Internacional Regional de Sanidad Agropecuaria (OIRSA) para que este último funja como organismo de tercera parte para implementar sistema de pago a los Médicos Veterinarios Responsables Autorizados evitando de esta forma el posible conflicto de interés.
- Notificación a los Establecimientos TIF autorizados para exportar a los Estados Unidos de América sobre la obligatoriedad para suscribir contrato con OIRSA en el que se establecen las disposiciones de pago a los Médicos Veterinarios Responsables autorizados a través de este organismo de tercera parte.
- Al mes de abril de 2011 los establecimientos TIF autorizados para exportar a los Estados Unidos de América, con necesidades de inspección veterinaria adicional a la oficial, han suscrito contrato con OIRSA.
- Los establecimientos TIF con autorización de exportación a los EE.UU. posterior a abril de 2011, y que requieran inspección veterinaria adicional a la oficial, necesariamente deben suscribir contrato con OIRSA que les permita realizar los pagos a través de este Organismo.

Debido a lo anterior le solicito de la manera más atenta se efectúe la actualización correspondiente al reporte final de auditoría la cual refleje la situación actual y acciones correctivas implementadas por el SENASICA en relación a este tema.

Sin más por el momento reciba un cordial saludo.



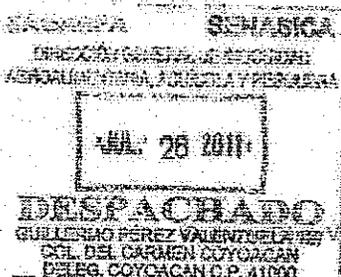
United States  
Department of Agriculture

26 JUL. 2011

**RECEIVED**  
Office of Agricultural Affairs  
Mexico City

ATENTAMENTE  
EL DIRECTOR GENERAL

*Octavio Carranza de Mendoza*  
MVZ. OCTAVIO CARRANZA DE MENDOZA



c.c.p. MVZ. José Jacobo López Camero. Director de Establecimientos TIF  
MVZ. Alvaro Cervantes Tenorio. Subdirector de Dictaminación y Certificación de Establecimientos TIF.  
MVZ. Francisco Jaime Sandoval (Coordinador de Proyectos Especiales).

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## FREE TRANSLATION

The National Service of Health, Food Safety, and Food Quality  
Agro-Food, Aquaculture and Fishery Safety General Directorate

Memorandum B00.04.6428

Mexico City, July 26, 2011

Dr. Ronald K. Jones  
Assistant Administrator  
Food Safety and Inspection Service  
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This is in reference to the preliminary report of the audit carried out from September 22 through October 22, 2009, performed by the Food Safety and Inspection Service personnel of the Mexican veterinary inspection system. The audit was intended to verify the equivalence and compliance with the regulative provisions established by the United States sanitary authority to allow the export of products and byproducts to the United States.

Therefore, I would like to comment on the findings of the audit. During the audit some inconsistencies regarding the assignments of personnel performing the inspection were detected and highlighted. It was observed that in 3 out of the 16 audited establishments, quite a few veterinarians performing inspections and other related activities were hired and paid by the establishments, representing a possible conflict of interests.

Presently, and with the objective of addressing that observation, SENASICA has implemented the following actions:

- The formation of a Medical Veterinarian Responsible Authority position to replace the position of the Approved Veterinarian. The responsibilities of the new position are outlined in the Federal Law of Animal Health.
- The National Service of Health, Food Safety, and Food Quality (SENASICA) contracted with the International Regional Organization for Animal Health (OIRSA) to implement the payment system for Medical Veterinarian Responsible Authority position thus, eliminating a possible conflict of interest.
- Those Federal Inspection Type (TIF) establishments, authorized to export to the United States of America, were notified of the requirement to contract with OIRSA. This contract establishes the payment system for Medical Veterinarian Responsible Authority position.
- As of April 2011, the TIF establishments authorized to export to the United States of America, must have a signed contract with OIRSA.
- The TIF establishments authorized to export to the United States of America after April 2011, must have Medical Veterinarian Responsible Authority position/s contracted with OIRSA with payment of these positions through this organization.

Given the above facts, SENASICA requests inclusion of these comments in the final audit report to more accurately reflect the current inspection system operated by SENASICA.

Sincerely,

DVM Octavio Carranza de Mendoza  
General Director