



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

*Handwritten mark*

DEC 9 2004

Dr. Ligia Quirós Gutiérrez, Chief  
Department of Meat Inspection  
Ministry of Agriculture and Livestock  
Post Office Box 10094  
1000 San Jose, Costa Rica

Dear Dr. Quirós:

The Food Safety and Inspection Service completed an on-site enforcement audit of Costa Rica's meat inspection system. The audit was conducted from June 8 through 17, 2004. The comments from Costa Rica have been included in the final report. Enclosed is a copy of the final report.

If you have any questions regarding the audit or need additional information, please contact me by telephone at 202-720-3781, by facsimile at 202-690-4040, or by e-mail at [sally.white@fsis.usda.gov](mailto:sally.white@fsis.usda.gov).

Sincerely,

Sally White  
Director  
International Equivalence Staff  
Office of International Affairs

Enclosure

cc: Katherine Nishiura, Attaché, US Embassy, San Jose  
Laura Dachner, Minister Counselor, Embassy of Costa Rica  
Jeanne Bailey, FAS Area Officer  
Amy Winton, State Department  
Barbara Masters, Acting Administrator, FSIS  
Linda Swacina, Executive Director, FSIA, OIA  
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Nancy Goodwin, IES, OIA, FSIS  
Country File

**FINAL**

NOV 29 2004

FINAL REPORT OF AN ENFORCEMENT AUDIT  
COVERING COSTA RICA'S MEAT INSPECTION SYSTEM

JUNE 8 THROUGH JUNE 17, 2004

Food Safety and Inspection Service  
United States Department of Agriculture

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## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

APHIS	Animal and Plant Health Inspection Service
CCA	Central Competent Authority
CVO	Chief Veterinary Officer
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
MAG	Ministry of Agriculture (Ministerio de Agricultura y Ganaderia)
MAGDSA	Ministry of Agriculture and Livestock, Division of Animal Health (Ministerio de Agricultura y Ganaderia, Direccion de Salud Animal)
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point System
<i>Salmonella</i>	<i>Salmonella</i> species
SSOP	Sanitation Standard Operating Procedures

## 1. INTRODUCTION

The audit took place in Costa Rica from June 8 to June 17, 2004.

An opening meeting was held on June 8, 2004 in San Jose, Costa Rica with the Central Competent Authority (CCA), which is the Ministry of Agriculture and Livestock, Division of Animal Health [Ministerio de Agricultura y Ganaderia, Direccion de Salud Animal (MAGDSA)]. At this meeting, the Food Safety and Inspection Service (FSIS) audit team confirmed the objective and scope of the audit, the audit itinerary, and requested additional information needed to complete the audit of Costa Rica's meat inspection system.

The audit team was accompanied during the entire audit by a representative from the MAGDSA and, when appropriate, representatives from the local inspection (establishment) offices.

## 2. OBJECTIVE OF THE AUDIT

This audit was an enforcement audit with a special focus on government oversight and enforcement. The objective of the audit was to determine whether Costa Rica may continue to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, one government laboratory performing analytical testing on United States destined product, two slaughter establishments, and one processing establishment.

Competent Authority Visits			Comments
Competent Authority	Central	1	MAGDSA in San Jose
	Local	3	Establishment Level
Laboratories		1	San Jose
Meat Slaughter Establishments		2	Alajuela and Heredia
Processing Establishment		1	Belen-Heredia

## 3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with MAGDSA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters. The third part involved on-site visits to three establishments. The fourth part involved a visit to one government laboratory. The Lanaseve Laboratory was conducting analyses of field samples for the presence of *Salmonella* and generic *Escherichia coli* (*E. coli*), as well as analyses of field samples for Costa Rica's national residue control program.

Program effectiveness determinations of Costa Rica's inspection system focused on 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 and Critical Control Point (HACCP) programs and testing programs for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella*. Costa Rica's meat inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the audit team evaluated the nature, extent and degree to which findings impacted on food safety and public health. The audit team also assessed how meat inspection services are carried out by the government of Costa Rica and determined if establishment and inspection system controls were in place to ensure that the meat products that Costa Rica exports to the United States are safe, unadulterated and properly labeled.

At the opening meeting, the audit team explained to the Ministry of Agriculture [Ministerio de Agricultura y Ganaderia (MAG)] officials that the Costa Rican inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Costa Rica. FSIS requirements include daily inspection in all certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, species verification testing, requirements for HACCP, SSOP, testing for generic *E. coli* and *Salmonella*, and government oversight/enforcement activities.

Currently, Costa Rica has one equivalence determination. Meat inspection officials are responsible for taking generic *E. coli* samples and Costa Rica's government laboratories are responsible for sample analysis.

#### 4. LEGAL BASIS FOR THE AUDIT

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

- The Federal Meat Inspection Act (21 U.S. Code 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the United States import requirements listed in 9 CFR 327 and the Pathogen Reduction (PR)/HACCP and SSOP regulations.

#### 5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at:

[http://www.fsis.usda.gov/Regulations\\_&\\_Policies/Foreign\\_Audit\\_Reports/index.asp](http://www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp)

The following deficiencies were identified during the FSIS audit of Costa Rica's meat inspection system conducted in September 2003:

- Inadequate control and supervision of inspectors in all four certified establishments at the local level (local supervisors/managers).
- Inadequate enforcement of FSIS requirements by inspectors in all four establishments. (Since basic FSIS requirements were not enforced in two establishments, these were delisted.)
- Inspection records documenting the establishment's compliance with SSOP requirements did not accurately reflect actual SSOP implementation in two establishments.

- Inadequate implementation of SSOP and HACCP in two establishments. This resulted in two 30-day Notices of Intent to Delist (NOIDs).
- Incomplete establishment records documenting SSOP maintenance, effectiveness, and corrective actions in all four establishments.
- Ineffective pest controls in two establishments.
- Inadequate maintenance of facilities in two establishments.
- Inadequate control of condensation in product areas in three establishments.
- Inhumane handling of livestock (no water) in two establishments.
- Inadequate sanitation controls of equipment and utensils in two establishments.
- Incomplete HACCP plan contents per 9 CFR 417.2 (c) in three establishments; such as monitoring frequencies, verification procedures, critical limits, and hazard analyses.
- Inadequate description of verification and/or validation in the HACCP plans of all four establishments.
- HACCP plans were not reassessed for *E. coli* O157:H7 in two establishments.
- Incomplete records for HACCP plan documentation in three establishments.
- Inadequate implementation of equivalent generic *E. coli* testing in two of the three slaughter establishments: (1) not using statistical process control technique procedures and (2) the establishment was taking the samples.

All deficiencies observed during the September 2003 routine, annual audit had been corrected and verified. No repeat deficiencies were observed during the June 2004 enforcement audit.

## 6. MAIN FINDINGS

### 6.1. Government Oversight

Meat inspection activities are centrally located in San Jose and are administered by the MAGDSA. MAGDSA is a subdivision within the MAG Division of Animal Health. The Chief of MAGDSA has direct authority over all meat establishments, including those certified to export meat to the United States. The official list of establishments is maintained and controlled by the Chief of MAGDSA. New official guidelines and regulations are issued by the CCA headquarters in San Jose.

Implementation of inspection activities is accomplished by the Veterinarian-in-Charge of each official establishment, with oversight from headquarters. Verification of implementation is accomplished by monthly supervisory reviews conducted by the Chief of MAGDSA's Meat Inspection Division. The central headquarters office has the legal and regulatory authority to administer the meat inspection program. There are no other levels of authority.

MAGDSA is a sister subdivision to the Department of the National Laboratory for the Veterinary Service [Departamento de Laboratori Nacional de Servicios Veterinarios (Lanaseve)], the national reference laboratory in San Jose. Both are subdivisions to the Division of Animal Health. Costa Rica's Lanaseve Microbiology Laboratory and Lanaseve Residue Laboratory are both located in San Jose near MAGDSA Headquarters. The two divisions of the government laboratory perform both chemical and microbiological testing of meat products.

The Division of Animal Health employs about 191 people. MAGDSA employs approximately 16 veterinarians, eight of which are located in establishments. Costa Rica employs 13 auxiliary



inspectors, 11 of which are in establishments to aid in carrying out its domestic and export meat inspection programs and related enforcement activities. Total personnel dedicated to the inspection and certification of products of animal origin is about 31.

### 6.2.1 CCA Control Systems

MAGDSA is headed by the Chief of the Meat Inspection Division. The Chief of the Meat Inspection Division is in charge of export activities for all certified establishments. This official performs the required monthly supervisory reviews to verify establishment compliance with FSIS requirements. The official list of certified establishments is maintained and controlled by the Chief of the Meat Inspection Division. New official inspection guidelines and regulations are issued by this office. These guidelines and regulations are provided by fax, e-mail, and hard copy to the inspection offices of each of the individual, certified establishments. MAGDSA does not have any regional offices that provide support or oversight of meat establishments certified to export meat to the United States. The Chief of the Meat Inspection Division is directly responsible for assuring implementation of FSIS requirements by the Veterinarian-in-Charge at each certified establishment.

### 6.2.2 Ultimate Control And Supervision

Control of inspection activities and supervision of non-veterinary inspectors at the establishment level is the responsibility of the Veterinarian-in-Charge. The Veterinarians-in-Charge are directly supervised by the Chief of the Meat Inspection Division. The Chief of the Meat Inspection Division is responsible for program delivery and assuring export requirements are implemented in all establishments. Staffing appeared adequate in individual establishments, although Costa Rica's CCA did not have adequate control and supervision over all inspectors carrying out official inspection responsibilities. Identified problems are reported in greater detail in section 6.2.3 of this report.

### 6.2.3 Assignment of Competent, Qualified Inspectors

The central headquarters is responsible for ensuring adequate training of inspectors before assignment to an official establishment. On the job training is carried out by the Veterinarian-in-Charge in each establishment. Additional training is provided by the National Center for Food Technologists, which is responsible for all other training activities, including HACCP training. MAGDSA officials received additional training and consultative services in advance of this enforcement audit. Certificates and other documentation related to the training and certification of Veterinarians-in-Charge and other inspection personnel are maintained by the Veterinarians-in-Charge and the CCA headquarters. These training certificates and records were reviewed by FSIS auditors.

Continuous daily inspection by official government inspectors was provided for each establishment certified to export meat products to the United States according to FSIS requirements, except as noted in the following deficiency:

- In one establishment, three assigned inspectors were being paid directly by the establishment.

#### 6.2.4 Authority and Responsibility to Enforce the Laws

The CCA and the official inspection personnel have the authority and responsibility to enforce United States' requirements. The Chief of the Meat Inspection Division and the Veterinarians-in-Charge at each establishment are authorized to enforce the government of Costa Rica's meat inspection legislation and United States' import requirements, including animal health and welfare, control of animal disease, veterinary medicines, and the production of safe foods of animal origin. MAGDSA has the legal authority to suspend operations and delist certified establishments to prevent the export of unsafe meat to the United States.

Each establishment has copies of the pertinent Costa Rica and United States rules, regulations, and requirements. Export requirements are communicated directly to each local establishment Veterinarian-in-Charge via e-mail or hard copy. Export requirements for each establishment certified to export to the United States are verified by the Veterinarian-in-Charge using a basic checklist. The checklists include SSOP, HACCP, and other FSIS requirements.

Costa Rican officials were meeting these requirements, except for the following serious deficiency:

- At one establishment, non-ambulatory animals are slaughtered at the end of the day's regular slaughter. This is in contradiction to a January 16, 2004, letter in which Costa Rica informed FSIS that non-ambulatory disabled cattle would not be introduced in the slaughterhouse and that they would be destroyed to avoid entering the human or animal food chain. While this establishment remained delisted because of the last FSIS audit finding, the establishment was presented as fully meeting FSIS requirements and therefore subject to all FSIS regulations.

#### 6.2.5 Adequate Administrative and Technical Support

It appears that the CCA has adequate administrative and technical support to operate Costa Rica's meat inspection system.

### 6.3 Headquarters Audit

The audit team met with the Chief of the Meat Inspection Division and other government officials at MAG and MAGDSA headquarters to obtain a better understanding of the oversight and enforcement responsibilities of the government of Costa Rica. In addition, the team was informed of the legislative and budgetary reforms and changes the government is undertaking to enhance Costa Rica's inspection system.

#### 6.3.1 Audit of Regional and Local Inspection Sites

Costa Rica has no other offices other than the central headquarters office in San Jose. Results of the audits of the inspection offices located in the individual establishments are reported in Section 13 of this report.

The audit team concluded that:

- All relevant regulations, notices, and other inspection documents and records were disseminated from headquarters to the three establishments. This activity was accomplished by hard copy and e-mail.
- Inspection personnel demonstrated adequate knowledge of inspection requirements relative to the export of meat to the United States.

## 7. ESTABLISHMENT AUDITS

The FSIS audit team visited three establishments, two of which were certified to export meat to the United States and one of which was presented as being ready for certification. Two of the establishments audited conducted both slaughtering and processing operations. The third establishment audited was only conducting processing operations and was receiving all product from one of the aforementioned slaughter and processing establishments. No establishments were delisted by MAGDSA or received a notice of intent to delist (NOID). However, the one establishment that was presented as fully meeting FSIS requirements would have been delisted if it was officially certified for United States export.

Specific deficiencies are noted on the attached Foreign Establishment Audit Checklists.

## 8. RESIDUE AND MICROBIOLOGY LABORATORY AUDIT

During the laboratory audit, emphasis was placed on the application of procedures and standards that are equivalent to United States requirements.

The residue laboratory audit focused on sample handling, sampling frequency, timely analysis, data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions.

The microbiology laboratory audit focused on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples.

The following laboratory was reviewed:

- The Lanaseve Laboratory located in San Jose, which conducts analyses of meat samples for Costa Rica's national residue program, as well as analyses of meat samples for the presence of *Salmonella* and generic *E. coli*.

The findings in the residue section of the Lanaseve Residue Laboratory are discussed in Section 12 (Residue Controls) and the findings in the microbiological section of the Lanaseve Laboratory section are discussed in Sections 11.3 and 13.2.

## 9. SANITATION CONTROLS

As previously stated, FSIS focuses on five areas of risk to assess an exporting country's meat inspection system. The first of these risk areas that the audit team reviewed was Sanitation Controls.

Except as noted below, Costa Rica's meat inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene and practices, and good product handling and storage practices.

In addition, Costa Rica's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

### 9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States' domestic inspection program. The SSOP in the three establishments audited were found to meet the basic FSIS regulatory requirements. No deficiencies regarding on-going SSOP requirements were identified.

### 9.2 Sanitation

The following Sanitation Performance Standard (SPS) deficiencies were noted (further details may be found in the individual Foreign Establishment Audit Checklists, which are attached to this report):

- In one establishment, hot water was not available at all of the hand washing stations during operation. Government inspection officials stopped operations until the deficiency was corrected.
- In the offal room area at one establishment, plastic curtains were used as a partition between two offal rooms. Blood stains were noticed on the plastic curtains due to the transportation of offal through these curtains. The plastic curtains were immediately removed.

## 10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS audit team reviewed was Animal Disease. These controls include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The audit team determined that the inspection system of Costa Rica had adequate controls in place. No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit. The Animal and Plant Health Inspection Service (APHIS) continues to have import restrictions on pork products due to the presence in Costa Rica of Hog Cholera (Classical Swine Fever).

## 11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS audit team reviewed was Slaughter/Processing Controls. These include the following areas: ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, ingredients identification, control of restricted ingredients, formulations, processing schedules, equipment and records.

The controls also include the implementation of HACCP systems in all establishments and implementation of a testing program for generic *E. coli* in slaughter establishments.

### 11.1 Humane Handling and Humane Slaughter

Controls for the humane handling and humane slaughter of cattle were in place except as noted below:

- In the animal holding pen at one establishment, a one foot high cement barrier at the gate between two holding pens was identified as a potential trip hazard for animals. The area was closed for use until the hazard is removed.

### 11.2 HACCP Implementation

All establishments certified to export meat products to the United States, with the exception of facilities dedicated to cold storage, are required to have adequately developed and implemented HACCP programs. The HACCP programs were evaluated according to the criteria employed in the United States' domestic inspection program.

During this audit, all three establishments audited were required to meet the HACCP requirements. Costa Rica had adequately implemented the HACCP requirements, except as noted below:

- In one establishment, the pre-shipment review records were initialed instead of signed. Establishment personnel will sign all future pre-shipment review records.
- In one establishment, the MAG re-inspection form for deboned meat was not consistent with regulatory requirements for documenting zero tolerance of ingesta and feces. MAG personnel were advised of the deficiency and are changing the re-inspection form.

### 11.3 Testing for Generic *E. coli*

Costa Rica has adopted the FSIS regulatory requirements for generic *E. coli* testing with the exception of the following equivalent measures. Costa Rica's meat inspection officials are responsible for taking generic *E. coli* samples, and Costa Rica's government laboratory is responsible for sample analysis. Costa Rica was following the equivalent measure in the two slaughter establishments audited.

#### 11.4 Testing for *Listeria monocytogenes*

None of the three establishments audited was producing ready-to-eat meat products for export to the United States. As a result, the FSIS requirements for *Listeria monocytogenes* testing do not apply.

### 12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS audit team reviewed was Residue Controls. These include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

No deficiencies were noted regarding residue controls.

Costa Rica's National Residue Control Program for 2004 was being followed as scheduled.

### 13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella* species.

#### 13.1 Daily Inspection in Establishments

Except for the deficiency noted below, daily inspection was being conducted as required in two of the three establishments audited:

- In one establishment, official inspection functions were being carried out by three inspectors who were paid directly by the establishment.

#### 13.2 Testing for *Salmonella*

Costa Rica has adopted the FSIS regulatory requirements for testing for *Salmonella* species.

Two of the three establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* was properly conducted in both establishments.

#### 13.3 Species Verification

Species verification was being conducted as required.

#### 13.4 Monthly Reviews

In all three establishments, monthly supervisory reviews were being performed and documented as required.

### 13.5 Inspection System Controls

Except as noted below, the CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security, including shipment between establishments; and prevention of commingling of product intended for export to the United States with product intended for the domestic market.

Two serious deficiencies in Costa Rica's inspection system controls were identified:

- In one establishment, official inspection functions were being carried out by three inspectors who were paid directly by the establishment.
- At one establishment, non-ambulatory animals are slaughtered at the end of the day's regular slaughter. This is in contradiction to a January 16, 2004, letter in which Costa Rica informed FSIS that non-ambulatory disabled cattle would not be introduced in the slaughterhouse and that they would be destroyed to avoid entering the human or animal food chain. While this establishment remained delisted because of the last FSIS audit finding, the establishment was presented as fully meeting FSIS requirements and therefore subject to all FSIS regulations.

Controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other countries for further processing.

Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

### 14. CLOSING MEETING

A closing meeting was held on June 17, 2004 in San Jose with the CCA. At this meeting, the primary findings from the audit were presented by the audit team.

The CCA understood and accepted the findings.

Shannon McMurtrey  
Lead Auditor

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## 15. ATTACHMENTS TO THE AUDIT REPORT

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



FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOVT AGENCY Ministerio de Agricultura Y Ganaderia	CITY & COUNTRY San Jose, Costa Rica	ADDRESS OF LABORATORY Barra de Haceria
NAME OF REVIEWER Dr. Farooq Ahmad	NAME OF FOREIGN OFFICIAL -----	

Residue Code/Name			Sal	Ecol	List											
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE													
	Sample Handling	01		A	A	A										
	Sample Frequency	02		A	A	A										
	Timely Analysis	03		A	A	A										
	Compositing Procedure	04		O	O	O										
	Interpret Comp Data	05		O	O	O										
Data Reporting	06	A	A	A												
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A											
	Correct Tissue(s)	08	A	A	A											
	Equipment Operation	09	A	A	A											
	Instrument Printouts	10	A	A	A											
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	O	O	O											
	Recovery Frequency	12	O	O	O											
	Percent Recovery	13	O	O	O											
	Check Sample Frequency	14	A	A	A											
	All Analyst W/Check Samples	15	A	A	A											
	Corrective Actions	16	A	A	A											
	International Check Samples	17	A	A	A											
REVIEW	Corrected Prior Deficiencies	18	O	O	O											
OTHER REVIEW		19														
		20														

Signature of reviewer: *Farooq Ahmad DM* Date: *6/21/04*

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOVT AGENCY Ministerio de Agricultura Y Ganaderia	CITY & COUNTRY San Jose, Costa Rica	ADDRESS OF LABORATORY Barra de Heredia
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NAME OF REVIEWER Dr. Farooq Ahmad	NAME OF FOREIGN OFFICIAL -----
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Residue Code/Name			100	200	300	400	500	800	923	950				
SAMPLING PROCEDURES	REVIEW ITEMS Sample Handling	ITEM # 01	A	A	A	A	A	A	A	A				
	Sample Frequency	02	A	A	A	A	A	A	A	A				
	Timely Analysis	03	A	A	A	A	A	A	A	A				
	Compositing Procedure	04	O	O	O	O	O	O	O	O				
	Interpret Comp Data	05	O	O	O	O	O	O	O	O				
	Data Reporting	06	A	A	A	A	A	A	A	A				
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A				
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A				
	Equipment Operation	09	A	A	A	A	A	A	A	A				
	Instrument Printouts	10	A	A	A	A	A	A	A	A				
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A	A	A				
	Recovery Frequency	12	A	A	A	A	A	A	A	A				
	Percent Recovery	13	A	A	A	A	A	A	A	A				
	Check Sample Frequency	14	A	A	A	A	A	A	A	A				
	All Analyst W/Check Samples	15	A	A	A	A	A	A	A	A				
	Corrective Actions	16	A	A	A	A	A	A	A	A	A			
International Check Samples	17	A	A	A	A	A	A	A	A	A				
REVIEW	Corrected Prior Deficiencies	18	O	O	O	O	O	O	O	O				
OTHER REVIEW		19												
		20												

Signature of reviewer: *[Signature]* Date: *6/21/04*

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Coopemontecillos Montecillos, Alajuela Box 290 Alajuela Costa Rica	2. AUDIT DATE June 11, 2004	3. ESTABLISHMENT NO. 0008	4. NAME OF COUNTRY Costa Rica
5. NAME OF AUDITOR(S) Dr. Farooq Ahmad		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	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
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	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		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.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	X
<b>Part C - Economic / Wholesomeness</b>		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	X
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment:

Costa Rica Est. = 0008 Date of audit: June 11, 2004

54 & 58 ) Non-ambulatory animals are slaughtered at the end of the day's regular slaughter. [ 9 CFR 309.3 (e)].  
NOTE: This establishment is not currently exporting meat to the United States since last year's audit when it was delisted.

49 & 51 ) Three inspectors assigned at this establishment were paid directly by the establishment. ( 9 CFR 327.2 )

61. NAME OF AUDITOR  
Dr. Feroze Ahmad

62. AUDITOR SIGNATURE AND DATE  
*Feroze Ahmad* 6/21/04

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION El Atico La Ribera de Bejen Heredia Costa Rica	2. AUDIT DATE June 10, 2004	3. ESTABLISHMENT NO. 0012	4. NAME OF COUNTRY Costa Rica
5. NAME OF AUDITOR(S) Dr. Farooq Ahmad		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		
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		
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		X
17. The HACCP plan is signed and dated by the responsible establishment individual.			44. Dressing Rooms/Lavatories		
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			45. Equipment and Utensils		
18. Monitoring of HACCP plan.			46. Sanitary Operations		
19. Verification and validation of HACCP plan.	X		47. Employee Hygiene		
20. Corrective action written in HACCP plan.			48. Condemned Product Control		
21. Reassessed adequacy of the HACCP plan.			Part F - Inspection Requirements		
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.			49. Government Staffing		
Part C - Economic / Wholesomeness			50. Daily Inspection Coverage		
23. Labeling - Product Standards			51. Enforcement		
24. Labeling - Net Weights			52. Humane Handling		X
25. General Labeling			53. Animal Identification		
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)			54. Ante Mortem Inspection		
Part D - Sampling Generic E. coli Testing			55. Post Mortem Inspection		
27. Written Procedures			Part G - Other Regulatory Oversight Requirements		
28. Sample Collection/Analysis			56. European Community Directives		O
29. Records			57. Monthly Review		
Salmonella Performance Standards - Basic Requirements			58.		
30. Corrective Actions			59.		
31. Reassessment					
32. Written Assurance					

## 60. Observation of the Establishment:

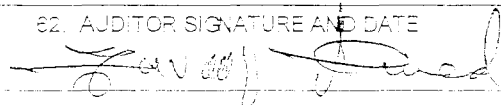
Costa Rica Est. # 0012 Date of audit: June 11, 2004

- 43 ) Deboning Room: No hot water was available at all the hand washing stations during operation. Government Officials stopped the operation till deficiency was corrected. ( 9 CFR 416.2 (g) )
- 16 & 51 ) The records of pre-shipment reviews were initialed instead of signed. ( 9 CFR 417.5 )  
The plant officials will correct this deficiency in the future.
- 19 ) Government reinspection records for deboned meat: The ingesta and feces were included under minor, major or critical deficiency instead of zero tolerance regulatory requirements. ( 9 CFR 417.8 )  
The Government inspection officials will change this reinspection form immediately to reflect the regulatory requirements.
- 39 ) Offal room: Plastic curtains were used for partition at the door between two offal rooms. Blood stains were noticed on the plastic curtains due to transportation of offal through these curtains. ( 9 CFR 416.2(b)(1) )  
The plant officials removed the plastic curtains immediately.
- 52 ) Animal holding pen: There was an approximately one foot high cement barrier at the gate between two holding pens. This may cause an animal to trip when moving over this barrier. ( 9 CFR 313.1(a) )  
Plant officials will not use this gate until this barrier is removed and the floor surface is even.

61. NAME OF AUDITOR

Dr. Farooq Ahmad

62. AUDITOR SIGNATURE AND DATE

 Date 6/21/04

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

<b>1. ESTABLISHMENT NAME AND LOCATION</b> Procesadora de Carnes del Rey Belen - Heredia Costa Rica	<b>2. AUDIT DATE</b> June 14, 2004	<b>3. ESTABLISHMENT NO.</b> 0019	<b>4. NAME OF COUNTRY</b> Costa Rica
<b>5. NAME OF AUDITOR(S)</b> Dr. Farooq Ahmad		<b>6. TYPE OF AUDIT</b> <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	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
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	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		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.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
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
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

Costa Rica Est. # 0019 (Processing only) Date of audit: June 14<sup>th</sup> 2004

61. NAME OF AUDITOR

Dr. Ferood Ahmad

62. AUDITOR SIGNATURE AND DATE

*Ferood Ahmad* DIRM 6/21/04



**Strengthening Plan of the Inspection and Certification System: Progress from June up to this date**

- The entire inspection personnel of the establishments became part of the Department of Agriculture and Livestock staff.
- The writing a cooperative agreement with the *Food Technology Research Center* (CITA Spanish acronym). Through the agreement, the exporting animal products department will recognize the HACCP plans that this Center works out for the establishments as part of the selling of services.
- In agreement with the Veterinary Medications Registry Department, ink, containing gentian violet as part of its components, used to mark dressed carcasses intended for human consumption, was prohibited. Artificial blue colorant #1 is now being used.
- Procedures at different stages of the production line of the establishments have been consolidated. This task continues.
- In view of problems that emerged disciplinary actions were administered to the personnel.<sup>1</sup>
- A staff member with a Master Degree in International Relations was appointed to organize:
  - National and international training.
  - Registration of exporting establishments.
  - Relationship with Embassies to know procedures and health requirements of new markets.
  - Coordinate meetings with the private sector to inform them about health requirements of the new markets.
- A veterinarian was transferred to the Department's main office so that in cooperation with the lawyer he/she can help with:
  - The writing of inspection and auditing procedures.
  - Follow up of sampling plans at cattle and poultry establishments.
  - Revision of OMC new health regulations.
  - Organize and follow up the rotating program of the Veterinarians and Inspectors.
  - Follow up the results of samplings sent to the laboratory.
- The job of reconciling the inspection and auditing tools at the different establishments has continued. During the June audit we had 4 reconciled tools and guideline regarding minimum requirements that must be met by a processing

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<sup>1</sup>Four people have transferred from the Department to other departments

products of animal origin establishment. At this moment, we have 8 and we hope to add 4 more in November.

- In October generic format or the general auditing guide was revised and improved. This generic guide has also been used by the poultry and dairy establishments. At this time, we have started a more adequate version for the poultry establishments. In January we will do the same for the dairy establishments.
- The internal training program was continued. In order to progress with the training and the preparation of the documents, the meetings were scheduled twice a week (Tuesdays and Thursdays) and instead of starting at 2:00 P.M., they are starting at 100 P.M.
- International training participation.
- International inspections participation of all veterinarians, who became officers, and work at official establishments.
- Together with the National Committee of Food *Codex*, the *Codex* subcommittees in: Dairy, Meat, Inspection and Certification were strengthened. Two new coordinators (always from the Department of Animal Health for Export) were assigned, and personnel from the Department were added to the Inspection and Certification subcommittee since there was no participation in it.
- In the next few weeks, the Health Hazards.<sup>2</sup> Evaluating Board will be formally established. For the moment it is made up of:
  - Department of Animal Quarantine Director, who is in charge.
  - Animal Health Department Export Director.
  - An epidemiologist from the Health Department.
  - Diagnostics Laboratory (LANASEVE) Director.
  - A representative from the National Institute of Health Investigation (INCIENSA Spanish acronym).

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<sup>2</sup>Recommendation from one of the audits conducted last May.