



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

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3/12/03

MAR 10 2003

Dr. Carlos Aguilar
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of Products of Animal Origin (SIOPOA)
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Avenue La Fao
Cotigou a INJUPEM
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Tegucigalpa
HONDURAS

Dear Dr. Aguilar:

Enclosed is a copy of the final report of the Food Safety and Inspection Service (FSIS) June 12-18, 2002, audit of the Honduras meat inspection system. We received Dr. Lizrdo Puerto's letter dated December 20, 2002, acknowledging receipt of the draft final audit report and notifying us of the corrective actions being taken by SENASA to address deficiencies identified in the report. We have incorporated this letter into the final report as Attachment "G." The corrective actions referenced in Dr. Puerto's letter had been previously outlined to us under separate cover via your letter of October 8, 2002.

During the June 12-18, 2002, FSIS audit of the Honduras meat inspection system, the FSIS auditor identified major deficiencies regarding the implementation by Establishments 004 and 012 of the Hazard Analysis Critical Control Points (HACCP) and the Sanitation Standard Operating Procedures (SSOP). This report provides information regarding the HACCP and SSOP deficiencies and associated product contamination concerns that resulted in the delistment of both establishments.

As communicated to you in our letter of November 6, 2002, FSIS has closely reviewed the corrective actions taken by Establishments 004 and 012, which the Government of Honduras verified in writing on October 8, 2002. These actions indicate that appropriate steps have been taken to ensure that effective sanitation and process control procedures are being followed in establishments manufacturing product for the U.S. market. Accordingly, we have allowed the Honduran Government to recertify these two establishments as being eligible to export meat to the United States, provided they continue to meet all FSIS regulatory requirements. The recertification of these plants took effect on December 20, 2002. Both establishments will be reviewed during the upcoming audit of the Honduran meat inspection program scheduled for March 25 - April 2, 2003. At that time, FSIS auditors will thoroughly evaluate the establishments' HACCP and SSOP programs and the Government of Honduras' inspection system controls to ensure that products produced for export to the United States meet U.S. import requirements. If serious deficiencies are again found during this audit, FSIS may find it necessary to suspend Honduras' authority to certify Honduran establishments to export meat to the United States.

Dr. Carlos Aguilar

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If you have any questions regarding the audit or the information contained in the enclosed audit report, please contact me at (202) 720-6400 or by fax at (202) 690-4040. You may also reach me by e-mail at Sally.Stratmoen@fsis.usda.gov.

Sincerely,

A handwritten signature in cursive script that reads "Sally Stratmoen JD". The signature is written in dark ink and is positioned above the typed name and title.

Sally Stratmoen
Acting Director
Equivalence Staff
Office of International Affairs

Enclosure

cc: Frank Coolidge, Counselor, American Embassy, Guatemala City
Ms. Maria Bennaton, Minister, Embassy of Honduras
Robert Hoff, FAS Area Director
Gene Philhower, FAS
Amy Winton, State Department
Donald Smart, Director, Review Staff, FSIS
Karen Stuck, Acting Deputy Assistant Administrator, OIA, FSIS
Sally Stratmoen, Acting Director, ES, OIA, FSIS
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Robert Tuverson, ES, OIA, FSIS
Country File (FY 2002 Audit)



AUDIT REPORT FOR HONDURAS

JUNE 12 THROUGH JUNE 18, 2002

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Honduras's meat inspection system from June 12 through June 18, 2002. The only establishment (Est. 4) certified to export meat to the United States was audited. In addition, at the request of the Government of Honduras, the FSIS auditor reviewed Establishment 12. The Government of Honduras delisted Establishment 12 immediately before this audit due to non-compliance with U.S. import requirements. Both establishments were slaughter facilities and were conducting deboning processing operations.

The last audit of the Honduran meat inspection system was conducted in June 2001. Two establishments were audited (Ests. 4 and 12). The following major concerns were identified at that time:

1. In Establishment 12, boxed product destined for export to the U.S. was not marked as such and was not segregated from product for the domestic market. Since the establishment had been delisted by the Honduran government, there was no product bound for the U.S.
2. Maintenance issues included broken floors, damaged freezer doors and rust on rails in carcass coolers. Since the report did not cite the offending establishment(s), and those deficiencies were not observed, those problems must have been corrected.
3. Beef tails in Establishment 12 contained feces and hair. This establishment had been delisted by the Honduran inspection service.
4. In Establishment 12, the esophagus, ready for export, was not split open and cleaned. The establishment had been delisted and the defect was not observed.
5. In Establishment 12, the SSOP program was not signed by an establishment official and dated. This deficiency had not been corrected.
6. No corrective actions were taken by establishment or government officials when pieces of plastic were found in product on several consecutive days. Did not encounter the situation in the records' review.
7. The HACCP plan did not specify critical limits and monitoring procedures for each CCP in both Establishment 4 and Establishment 12. This had not been corrected in either establishment.

From January 1 through June 30, 2002, Honduran establishments exported 343,200 pounds of beef products to the United States. Port of entry (POE) rejections were for residues and contamination consisting of two lots totaling 86,400 pounds.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Honduran national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. There was no pre-selection of establishments for the audit because there was only one certified Honduran establishment. The third was conducted by on-site visits to establishments. The fourth was a visit to the SENASA (Servicio Nacional De Sanidad Agropecuaria) government laboratory, LANAR Laboratory (Laboratory of Residues Analysis), that is also responsible for the government microbiological testing program analyses. Establishment 12 was audited at the request of the American Embassy and the Government of Honduras.

Honduras's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During the on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

No effective inspection system controls were found to be in place in either of the establishments audited. Establishment 4 was found to be unacceptable and was delisted immediately by the Government of Honduras. Regarding Establishment 12, the FSIS auditor agrees with the Government of Honduras' earlier action of delisting this establishment. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

As previously stated, seven major concerns had been identified during the last audit of the Honduran meat inspection system, conducted in June 2001. During this new audit, the auditor determined that the concerns had been corrected or were not observed, except for the issue of signing and dating the SSOP plan in Establishment 12, and addressing the risk areas and corrective actions in each of the steps of the flow chart/hazard analysis.

In the previous audit, SSOP deficiencies were found in Establishment 12 in that the SSOP plan had not been signed or dated. HACCP plan deficiencies had been found in both of the establishments, (Ests. 4 and 12). In this new audit, the required HACCP programs were again found to be deficient (this was a repeat finding). Details are provided in the Slaughter/Processing Controls section later in this report.

Entrance Meeting

On June 12, 2002, an entrance meeting was held in the offices of the Honduran SENASA, SIOPOSA, Ministry of Agriculture. The meeting was attended by Dr. Judd Giezentanner, International Audit Staff Officer, FSIS; Dr. Lizardo Reyes, the new Director General of SENASA; Dr. Carlos Aguilar, the new Chief of the Department of SIOPOA (Official Inspection Service of Products of Animal Origin); and Dr. Pedro Barahona, the new Chief of the Section of Meat Products. Topics of discussion included the following:

1. The auditor's itinerary.
2. A potential need for information about FSIS requirements for *Salmonella* and *E. coli* testing. The response was that the information was not needed.
3. Country officials verified that they were performing species verification testing.
4. Laboratory check samples
5. There was a discussion about the rejection of 44,400 pounds of meat at the Miami import inspection station because of the presence of violative levels of a bromide (PCB) substance (.13ppb). The Government of Honduras was concerned about the proper response to make concerning corrective actions.
6. FSIS Enforcement Questionnaire.

Headquarters Audit

There had been significant changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of the Honduran meat inspection system in June 2001. Dr. Lizardo Reyes is the new Director General of SENASA. Dr. Carlos Aguilar is the new Chief of the Department of Official Inspection Service of Animal Origin Products. Dr. Pedro Barahona is the new Chief of the Section of Meat Products.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called “the auditor”) observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records’ review. This records review was conducted at the district office. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels, and animal raising claims.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.

No concerns arose as a result the examination of these documents.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Honduras as eligible to export meat products to the United States were full-time SIOPOA employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

At the time of the audit, one establishment (Est. 4) was certified to export meat products to the United States. The FSIS auditor noted that inspection system controls or establishment inspection controls were NOT in place to prevent, detect, or control contamination and the adulteration of products. As a result, the Government of Honduras immediately decertified Establishment 4. Additional information regarding the findings of Establishment 4 is noted elsewhere in this report.

In addition, the FSIS auditor reviewed Establishment 12. The Honduras Government, which decertified this establishment immediately prior to the audit, requested FSIS to review it. Following the review, the FSIS auditor concurred with the Government of Honduras' previous action of decertifying Establishment 12.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of laboratories; intra-laboratory quality assurance procedures, including sample handling; and methodology.

The National Laboratory for Residue Analysis in Tegucigalpa was audited on June 17, 2002. Effective controls were in place for 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. The methods used for the analyses were acceptable.

The National Laboratory in Tegucigalpa, a government laboratory, was also performing Honduras's microbiological testing for *Salmonella*. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, procedures and corrective actions.

Establishment Operations by Establishment Number

The following operations were being conducted in the two establishments:

Beef slaughter and boning - two establishments (Ests. 4 and 12)

SANITATION CONTROLS

Based on the on-site audits of establishments, Honduras's inspection system had controls in place for back-siphonage prevention, hand-washing facilities, sanitizers, temperature, lighting, operations and inspectors' work space, welfare facilities, outside premises, personal dress, habits, hygiene procedures, cross-contamination prevention, equipment sanitizing, product handling and transportation, maintenance and waste disposal. However, the following deficiencies were noted: Establishment 4's SSOP plan did not address pest control and did not have adequate corrective actions for chlorine levels not meeting the minimal standards. Establishment 12: 1) had daily chlorine levels exceeding the minimum levels established in its SSOP plan, 2) had deeply scored cutting boards that were discolored with product residues on pre-operational sanitation and broken plastic product totes, and 3) SSOP plan did not address pest control.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs did not meet the basic FSIS regulatory requirements in Establishments 4 and 12. Establishment 4 did not have its SSOP plan signed and/or dated. In addition, as required by FSIS regulation 9 CFR 416.15 (b), Establishment 12 did not have a procedure for reconditioning meat contaminated during the processing procedures listed in their SSOP plan.

The SSOPs were not found to meet the basic FSIS regulatory requirements.

Cross-Contamination

Employees at Establishment 12 were observed nesting the outside of boxes inside the product contact surface of the box beneath it. Accordingly, the potentially contaminated outside surfaces of boxes were being nested to contact the food contact surfaces of the empty box beneath it, before the boxes were filled with product.

Personnel Hygiene and Practices

In Establishment 4, employees failed to wash their hands after contaminating them before continuing to work with exposed product. Corrective actions were not immediate.

Sanitation control findings that are of major concern and the proposed corrective actions are:

1. Establishment 4's chlorine levels in the water did not meet the minimum standards as established in its SSOP plan. The inspection service will more closely monitor the chlorine testing procedures and require the establishments to more fully address corrective actions.
2. Establishment 12 had deeply scored and discolored cutting boards. The inspection service will monitor more closely the replacement and/or reconditioning of such boards.
3. Establishment 4 did not have its SSOP plan signed nor dated. The inspection officials and establishment personnel stated that they will make certain that the establishment's SSOP plans are signed and dated.
4. Establishment 12's boxes were nested inside each other possibly causing contamination for product contact surfaces. The inspection service will more closely monitor the practice.
5. Establishment 4 employees in the processing area were handling product without washing their hands after contaminating them. The government inspection service will more closely monitor the practice.
6. Establishment 12 did not address the re-conditioning of meat contaminated during processing procedures in their SSOP plan. The establishment will be required to include the procedure in their program.

ANIMAL DISEASE CONTROLS

Honduras' inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Honduras' National Residue Testing Plan for 2002 was being followed, and was on schedule. The Honduran inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals

SLAUGHTER/PROCESSING CONTROLS

The Honduran inspection system had controls in place to ensure adequate ante-and post-mortem inspection procedures and dispositions, control and disposition of dead, dying, diseased or disabled animals, humane handling and slaughter, packaging materials, label approvals, inspector monitoring, and processing (boning and cutting) equipment and records.

HACCP Implementation

All establishments approved to export meat/poultry products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to have the following deficiencies:

1. Establishment 4 had not reassessed their HACCP plan since 1999 and was not conducting the proper pre-shipment review.
2. Establishment 12 had not reassessed their HACCP plan since 2000 and was not conducting a pre-shipment review. Also, their risk analysis did not address each of the risk areas in the steps of their hazard analysis.

Testing for Generic *E. coli*

Honduras has adopted the FSIS regulatory requirements for generic *E. coli* testing with the exception of the following equivalent measures.

1. **SAMPLE COLLECTOR: Government Takes Samples.** The criteria used for equivalence decisions for use of government employees in lieu of establishment employees are:
 - There is a clearly written sampling plan with instructions for sample and collection that will be universally followed.
 - The government has a means of ensuring that sample collection activities are appropriate.
 - The government uses the test results to verify establishment slaughter processing and dressing controls for fecal contamination.
2. **LABORATORIES: Government Laboratories.** The criteria used for equivalence decisions for use of government laboratories in lieu of private laboratories are:
 - The laboratory has properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
 - Results of analyses, including all permanently recorded data and summaries, are reported promptly to the establishment.
3. **GENERIC *E. COLI* TESTING STRATEGY: Frequency of Testing.** The criteria used for equivalence decisions for determining whether a different testing frequency for generic *E. coli* testing is equivalent are:
 - Testing frequency is based on production volume with at least one test per week.
 - The predominant class of animals slaughtered in an establishment is sampled.
4. **SAMPLING SITES: Location of Sampling Sites.** The criteria used for making equivalence decisions for determining whether different sample sites for *E. coli* testing is equivalent are:
 - The sample sites include the sites most likely to be contaminated with fecal contamination.
 - The sample sites encompass a large enough surface area to ensure that the effectiveness of the slaughter process controls will be evaluated.
 - The sample sites provide the same probability of detecting the presence of fecal contamination as the sites chosen by FSIS.
5. **SAMPLING TOOLS.** The criteria used for making equivalence decisions for approval of alternative sampling tools for sampling for *E. coli* are:
 - The tool is a traditional generally recognized sample collection tool for sampling for *E. coli* on meat or poultry surfaces.
 - The tool is sensitive enough to gather *E. coli* present on the sample site.
 - The tool does not contaminate the surfaces of the carcass.

These measures and the application of them appear to be adequate in carrying out an effective *E. coli* control program.

Additionally, establishments had adequate controls in place to prevent meat products intended for Honduran domestic consumption from being commingled with products eligible for export to the United States.

ENFORCEMENT CONTROLS

Inspection System Controls

The Honduras inspection system controls [control of restricted product and inspection samples, boneless meat re-inspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other countries for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Both of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Honduras has adopted the FSIS regulatory requirements for *Salmonella* testing.

The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements.

Species Verification Testing

At the time of this audit, Honduras was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Monthly Reviews

These reviews were being performed by the Honduran equivalent of Area Supervisors. All were veterinarians with at least 20 years of experience. Dr. Barahona was in charge of the reviews.

The internal review program was applied equally to both export and non-export establishments. Internal review visits were announced in advance and were conducted by individuals, at least once monthly, and sometimes more often. The records of audited establishments were kept in the inspection offices of the individual establishments. In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, a supervisor is empowered to conduct an in-depth review, and the results are reported to the Government of Honduras Meat Inspection program for evaluation; they formulate a plan for corrective actions and preventive measures.

After observing the internal reviewer's activities in the field, the auditor was confident in their professionalism, thoroughness, and knowledge of U.S. requirements, and in the effectiveness of Honduras's internal review program.

Enforcement Activities

On February 15, 2000, new laws were enacted to combine domestic and export rules. Enforcement cases are handled by the Government of Honduras Meat Inspection Program.

Exit Meetings

An exit meeting was conducted in Honduras on June 18, 2002. The participants included Dr. Judd Giezentanner, International Audit Staff Officer, FSIS; Ana Gomez, USDA, FAS Agricultural Specialist; Dr. Carlos Humberto Aguilar, Chief of the Department of SIOPOA; Dr. Max Alexis Rivera, Director of LANAR/SENASA; Dr. Nedia Garcia, Technical Sub-Director of Animal Health; Dr. Pedro Barahona, Chief of the Section of Meat Production; and Oscar Bermudez, Chief of the Section of Milk Production. The following topics were discussed:

1. Enforcement activities. The auditor was provided with a disc that contained their rules and regulations regarding enforcement.
2. Availability of University of Puerto Rico HACCP Seminars and information training opportunities.
3. Inspectors and IIC's need to be empowered to monitor and control production, SSOP, HACCP plans and practices. They have implemented a training program regarding such practices. The training schedule had started on May 29, 2002 and will run through June 27, 2002

4. Chlorine levels in the water at both establishments and the need for corrective actions. They will mandate that those corrective actions be included in the SSOP plans.
5. Delisted establishments cannot export product as of the date of the delisting audit until they are audited again by FSIS.
6. FSIS International Policy will institute a conference call with SIOPOA to discuss the audit findings.

CONCLUSION

The inspection system of Honduras was found to have ineffective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those that FSIS requires in domestic establishments. Establishment 4, the only establishment certified to export meat products to the United States at the time of this audit, was audited by FSIS. This establishment was found to be unacceptable and was delisted for export to the United States by the Government of Honduras.

In addition, at the request of the Government of Honduras, the FSIS auditor reviewed Establishment 12. The Government of Honduras delisted Establishment 12 immediately before this audit due to non-compliance with U.S. import requirements. During the FSIS review, this establishment was found to be unacceptable and FSIS agrees with the Government of Honduras' earlier action of delisting this establishment for export to the United States.

Judd Giezentanner, DVM
International Audit Staff Officer

ATTACHMENTS

- A. Data collection instrument for SSOPs
- B. Data collection instrument for HACCP programs
- C. Data collection instrument for *E. coli* testing
- D. Data collection instrument for *Salmonella* testing
- E. Laboratory Audit Form
- F. Individual Foreign Establishment Audit Forms
- G. Written Foreign Country's Response to the Draft Final Audit Report

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1. Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. identified	7. Documentation done daily	8. Dated and signed
4	√	√	√	√	√	√	√	No
12	√	√	No	√	√	No	√	√

Est. 4 – SSOP not signed and dated.

Est. 12 – Operational sanitation not addressed. Individuals responsible for area/equipment not identified.

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. (except Est. 12, which was a cold-storage facility) was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. review
4	√	√	√	√	√	√	√	√	√	√	√	No
12	√	No	√	√	No	√	√	No	√	√	√	No

Est. 4 – not performing pre-shipment review.

Est. 12 – Users not indicated. Monitoring frequency and site not specified. Adequate verification procedures not specified. Not performing pre-shipment document reviews.

Data Collection Instrument for Generic *E. coli* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli*.
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1. Written procedure	2. Sampler designated	3. Sampling location given	4. Predominant species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
4	√	√	√	√	√	√	√	√	√	√
12	√	√	√	√	√	√	√	√	√	√

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

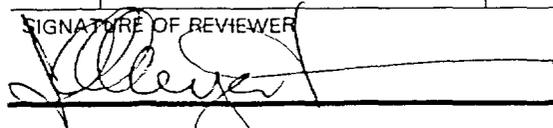
1. Salmonella testing is being done in this establishment.
2. Carcasses are being sampled.
3. Ground product is being sampled.
4. The samples are being taken randomly.
5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.
6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	1. Testing as required	2. Carcasses are sampled	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
4	√	√	N/A	√	√	√
12	√	√	√	√	√	√

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN COUNTRY LABORATORY REVIEW		REVIEW DATE 18/06/02	NAME OF FOREIGN LABORATORY LANAR
FOREIGN GOV'T AGENCY SENASA	CITY & COUNTRY Tegucigalpa, Honduras	ADDRESS OF LABORATORY	
NAME OF REVIEWER Judd Giezentanner		NAME OF FOREIGN OFFICIAL Dr. Mas Alexis Rivera	

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

SIGNATURE OF REVIEWER 	DATE 6/21/02
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REVIEW DATE

NAME OF FOREIGN LABORATORY

17/06/02

LANAF

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 SENASA

CITY & COUNTRY
 Tegucigalpa
 Honduras

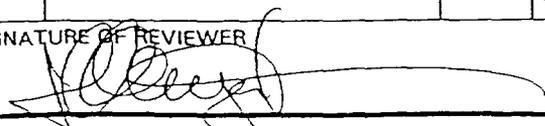
ADDRESS OF LABORATORY

NAME OF REVIEWER
 Judd Giezentanner

NAME OF FOREIGN OFFICIAL
 Dr. Max Alexis Rivera

Residue Code/Name			300	800	200	500	Spec	100	203	404					
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE												
	Sample Handling	01		A	A	A	A	A	A	A	A				
	Sampling Frequency	02		A	A	A	A	A	A	A	A				
	Timely Analyses	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	EVALUATION CODE	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	EVALUATION CODE	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					
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE	A	A	A	A	A	A	A					
OTHER REVIEW		19	EVAL. CODE												
		20													

SIGNATURE OF REVIEWER



DATE

6/21/02

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION C & D Catacalma, Olancho Honduras	2. AUDIT DATE 06/13/02	3. ESTABLISHMENT NO. 4	4. NAME OF COUNTRY
	5. NAME OF AUDITOR(S) Dr. Judd Giezentanner		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.	X	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.		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	X
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.	X	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	
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			

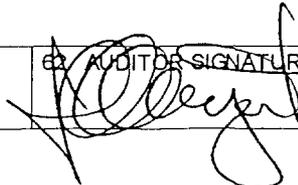
60. Observation of the Establishment

HONDURAS – EST. 4

- 9 - HACCP plan not re-assessed since 1999. SSOP signed, but not dated.
- 21 - Each of the risk areas not assessed in each step of the hazard analysis.
- 46 - Cross contamination due to employees not washing their hands between handling exposed product and equipment/boxes.

61. NAME OF AUDITOR
Judd Giezentanner, DVM

62. AUDITOR SIGNATURE AND DATE

 6/13/02

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Continental SA San Pedro Sula	2. AUDIT DATE 06/15/02	3. ESTABLISHMENT NO. 12	4. NAME OF COUNTRY Honduras
	5. NAME OF AUDITOR(S) Dr. Judd Giezentanner		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 Sampling	
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	
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	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	X
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.	X	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	
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

HONDURAS – EST. 12

15 -Each of the risk areas not assessed in the steps of the Hazard Analysis.

21 - HACCP plan not reassessed since 2000.

43 - Chlorine levels in the water have an almost daily violation of safe levels with no preventive actions and inadequate corrective actions.

46 - Cutting boards in the deboning room were deeply scored and discolored with product residues from the previous day's operations.

61. NAME OF AUDITOR
Judd Giezentanner, DVM

62. AUDITOR SIGNATURE AND DATE



6/15/02

OFFICE OF AGRICULTURE AND LIVESTOCK

**NATIONAL SERVICE FOR LIVESTOCK
SANITATION (Spanish acronym: SENASA)**

Letter-389-DGS-2002

Tegucigalpa, M.D.C

Licenciada
Ana Gómez Genizzotti
Agricultural Specialist
American Embassy
Your office

Dear Ms. Gómez:

This is to inform you of the Schedule of the Hazard Analysis and Critical Control Point System Inspections to be conducted in the packing facilities of bovine meat, plant # 4 (C&D) and plant # 12 (Continental), as requested by Dr. Judd Giezentanner/FSIS-USA during his official inspection conducted from June 12 through June 19, 2002. Inspections to the Hazard Analysis and Critical Control Point System (HACCP) will be conducted by the national and regional supervisors of the Department of the Official Inspection Service of Animal Products (Spanish acronym: SIOPOA), which will coordinate them according to the following schedule. The 2003 Schedule of HACCP inspections will be sent to you by the end of this year.

Sincerely,

[Illegibly signed]
Dr. Lizardo Reyes Puerto
General Director
SENASA – SAG

Cc: Dr. Nidia Marlene García/ Technical Deputy Director of Animal Health
Dr. Carlos Humberto Aguilar / Chief of "SIOPOA"
Dr. Pedro Vicente Barahona / Chief of the Meat Products Section
Filing office

**SCHEDULE OF HACCP INSPECTIONS TO MEAT PACKING FACILITIES
(PLANT # 4 AND PLANT #12)**

DATE	PLANT
AUGUST 21, 2002	EMPACADORA CONTINENTAL (PLANT #12)
AUGUST 28, 2002	EMPACADORA C&D (PLANT #4)
SEPTEMBER 24, 2002	EMPACADORA CONTINENTAL (PLANT #12)
SEPTEMBER 26, 2002	EMPACADORA C&D (PLANT #4)
OCTOBER 23, 2002	EMPACADORA CONTINENTAL (PLANT #12)
OCTOBER 30, 2002	EMPACADORA C&D (PLANT #4)
NOVEMBER 26, 2002	EMPACADORA CONTINENTAL (PLANT #12)
NOVEMBER 28, 2002	EMPACADORA C&D (PLANT #4)
DECEMBER 17, 2002	EMPACADORA CONTINENTAL (PLANT #12)
DECEMBER 19, 2002	EMPACADORA C&D (PLANT #4)