United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

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for Products of Animal Origin
Ministry of Agriculture and Provisions
Division of International Commerce Control
Ministry of Agriculture Annex
Block D, 4th Floor, Room 436[a]
70403-900 Brasilia, DF Brazil

Dear Dr. Costa:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Brazil's meat inspection system July 6 to August 14, 2009. Comments received from the government of Brazil have been included as an attachment to the final report. Enclosed is a copy of the final audit report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 205-3969, by facsimile at (202) 720-0676, or electronic mail at james.adams5@fsis.usda.gov.

Sincerely,

James Adams, DVM
Director
International Audit Staff
Office of International Affairs

Enclosure

cc:

CC: List for Letters
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Emerson Kloss, Second Secretary, Embassy of Brazil OSTA, FAS
Hugh Maginnis, FAS Area Director, Western Hemisphere
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Country File

FINAL REPORT OF AN AUDIT CARRIED OUT IN BRAZIL COVERING BRAZIL'S MEAT INSPECTION SYSTEM

July 7 through August 14, 2009

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority (DIPOA)
DIPOA	Department of Inspection of Products of Animal Origin
MAPA	Ministry of Agriculture, Livestock and Supply
SDA	Agriculture and Livestock Defense Secretariat
CGPE	International Export and Import Programs Coordination Division
DFA	Delegate for Federal Agriculture Office at State Level
SFA	Superintendent for the Federal Agriculture Office at the State Level
SIPAG	Federal Inspection of Products of Animal Origin at the State Level
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
SSOP	Sanitation Standard Operating Procedures
E. coli	*Escherichia coli*
Salmonella	*Salmonella* species

1. SUMMARY

1.1 Description /Eligibility

This report summarizes the outcome of the audit conducted in Brazil from July 7 to August 14, 2009. This was a routine audit with special emphasis on humane handling and slaughter of livestock. Brazil is eligible to export thermally processed shelf stable, not heat treated shelf stable, heat treated shelf stable, and fully cooked not shelf stable products to the United States. At the time of previous audit, 22 establishments were eligible to export to the U.S. Between January 1, to December 31, 2008, Brazil exported 113,355,914 pounds of beef jerky, cooked/frozen beef, corned beef, and beef extracts products to the U.S.; there were 1,797,434 pounds rejections for food-safety concerns. Activities of the current audit appear in the table below.

The findings of the previous audit during August 27 through September 5, 2008, resulted in no restrictions of any Brazil's establishment's ability to export products to the US.

1.2 **Comparison of the Current Audit and the Previous Audit**

		LAST AUDIT DATES	PREVIOUS AUDIT DATES
Levels of Government Oversight Audited			
	Headquarters	1	1
	Regional	2	0
	Establishment Level	11	4
Laboratories Audited			
	Microbiology	1	0
	Residue	1	0
Establishments Audited			
	Slaughter/processing	9	2
	Processing	2	2
Enforcement Actions Initiated			
	NOID	0	0
	Delistment	0	0
Risk Area Findings			
	Sanitation Controls (SSOP, SPS)	2/3	1/4
	Animal Disease Controls	0	0
	Slaughter/Processing (PR/HACCP)	1	5
	Residue Controls	0	0
	Microbiology Controls	0	0
	Inspection/Enforcement Controls	4	2
	Special Emphasis (HH, O157:H7)	0	0

2 INTRODUCTION

The audit took place in Brazil from July 7 through August 14, 2009.
An entrance meeting was held on July 7, 2009 in Brasilia with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of

the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Brazil's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the Department of Inspection of Products of Animal Origin (DIPOA) and/or representatives from the Service of Federal Inspection of Products of Animal Origin at the State Level (SIPAG).

3. OBJECTIVE OF THE AUDIT

This audit was a routine audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter and processing establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of DIPOA, located in Brasilia; two regional offices, one private microbiological laboratory, one government residue laboratory, nine meat slaughter and processing establishments and two meat processing establishments.

4. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA 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 or regional offices. The third part involved on-site visits to 11 establishments: nine slaughter and processing establishments and two processing establishments. The fourth part involved visits to government residue laboratory and microbiology laboratories.

Program effectiveness determinations of Brazil's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures; (2) animal disease controls; (3) slaughter/processing controls, including the implementation and operation of HACCP programs and a testing program for generic *E. coli*; (4) residue controls; and (5) enforcement controls, including a testing program for *Salmonella*. Brazil's inspection system was assessed by evaluating these five risk areas.

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

At the entrance meeting, the auditor explained that Brazil's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Brazil. FSIS requirements include, among other things, daily inspection in all certified establishments, periodic supervisory visits to 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, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella.*

Equivalence determinations are those that have been made by FSIS for Brazil under provisions of the Sanitary/Phytosanitary Agreement.

- Establishment employees collect *Salmonella* carcass samples.
- *Salmonella* carcass samples are analyzed by private laboratories.
- Brazil suspends an establishment the third time it fails to meet a *Salmonella* performance standard.

5. LEGAL BASIS FOR THE AUDIT

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

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

6. 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

The following non-compliances were identified during the FSIS audit of Brazil's meat inspection system conducted in June 11 through July 22, 2008.

- Two establishments were delisted for noncompliance with the implementation requirements for SSOP, SPS, and HACCP programs, lack of inspection coverage when U.S.-eligible product was produced, and lack of enforcement by the Government of Brazil (GOB) meat inspection officials.
- Seven establishments each received a Notice of Intent to Delist (NOIDs) for inadequate implementation of HACCP, SSOP, and SPS requirements and lack of enforcement of inspection requirements by the GOB meat inspection officials.
- In all 11establishments, some SSOP requirements were not met.
- In nine of the 11 establishments, some SPS requirements were not met.
- In 10 establishments, some HACCP implementation requirements were not met.
- In all 11 establishments, the periodic supervisory reviews performed by the SIPAG/DIPOA did not adequately verify the implementation of HACCP, SSOP, and SPS requirements.
- In six establishments, DIPOA inspection officials were not verifying the reliability and effectiveness of the SSOP adequately to ensure that the establishment met the FSIS requirements.
- In four establishments, DIPOA inspection officials had conducted pre-operational and operational sanitation SSOP verifications but no deficiencies had been reported during periods ranging from two to six months.

- In six establishments, documentation of corrective actions taken in response to non-compliances identified during pre-operational and operational sanitation inspection did not include procedures to ensure appropriate disposition of product(s) that could be contaminated.
- In two establishments, DIPOA inspection officials did not review and determine the adequacy of corrective actions taken when a deviation from a Critical Limit (CL) occurred.
- In one establishment, DIPOA inspection officials were not verifying the adequacy of the establishment's HACCP plan for the first-shift operations to determine if it met FSIS requirements.
- In one establishment, DIPOA inspection officials were not verifying the adequacy of the establishment's HACCP plan for the second-shift processing operations to determine if it met FSIS requirements for direct measurement at a CCP.
- In two establishments, DIPOA inspection officials did not remove Specified Risk Materials (SRMs) (tonsils) in a sanitary manner during the post-mortem inspection.
- In one establishment, an establishment employee was not removing SRMs (spinal cords) in a sanitary manner to ensure that there was no cross-contamination with edible product (broken pieces of spinal cords were contacting edible parts of the carcasses).
- In five establishments, DIPOA inspectors at the post-mortem inspection stations were not incising and observing lymph nodes or the masticatory muscles of beef heads properly.
- DIPOA officials did not demonstrate that they have effective oversight to ensure the accountability of the SIPAG officials and effective supervision of inspection activities at the establishment level.
- SIPAG did not demonstrate that it has adequate supervision over the Regional Veterinary Supervisors and inspectors in the certified meat establishments.
- The Regional Veterinary Supervisors did not demonstrate that they have adequate supervision over the inspectors in the certified meat establishments.
- Verification by all SIPAG offices of the implementation of U.S. requirements was inadequate.
- In one processing establishment, inspection coverage was not provided during first shift processing operations when U.S.-eligible product was produced.
- The formal training of inspection personnel in the principles of HACCP/Pathogen Reduction was not sufficient to ensure enforcement of U.S. requirements.
- In newly-listed establishments, DIPOA inspection officials had inadequate or no formal training in HACCP/Pathogen Reduction for enforcement of U.S. requirements.
- The formal training of inspection personnel in the principles of HACCP/Pathogen Reduction was not sufficient to ensure enforcement of U.S. requirements.
- DIPOA made a commitment to FSIS on June 28, 2005, (letter # 83/CGPE /DIPOA/05) that certified microbiological laboratories would be audited bimonthly, jointly with the Coordination Office of Laboratory Support (CGAL). These audits were not being conducted at the frequency described.
- The Laboratory Quality Assurance (QA) officials performed an internal audit on September 3 through 29, 2007 that covered a 1-year period. A total of 10 non-compliances were observed such as: No personnel training program; no calibration records for thermometers, ovens, standard weights, reference weight, and micropippets; no SOP for equipments; identification of envirmental safety issues;

no documentation of equipment that returns after repair; and standards without original certificates.

- A follow-up audit was performed to evaluate the compliance with the issued Corrective Action Reports (CARs) on April 8, 2008, by the QA officials. Two of the 10 identified non-compliances were corrected and another two non-compliances were disputed by the laboratory Director. Agreed-upon correction dates were not complied with for the rest of the identified non-compliances.
- There were no records documentationing that the identified non-compliances were corrected and no new dates were established for the implementation of corrective actions.
- DIPOA made a commitment to FSIS on June 28, 2005, (letter # 83/CGPE /DIPOA/05) that certified microbiological laboratories would be subjected to bimonthly audits, jointly with the Coordination Office of Laboratory Support (CGAL). Bimonthly audits were not implemented by CGAL/DIPOA and only five audits were conducted by CGAL since June 28, 2005.
- CGAL/DIPOA officials conducted an audit of the LACI microbiology laboratory on December 7, 2005; however, CGAL officials did not verify the corrective actions taken for the deficiency identified in the follow-up audit, nor did the laboratory officials have any records to document corrective actions taken.
- CGAL/DIPOA instructed the LACI laboratory officials on December 7, 2005, to implement bimonthly internal audits. The laboratory officials did not follow these instructions and had conducted only five internal audits since December 7, 2005.
- The private microbiology laboratory, SFDK, located in Sao Paulo, was conducting tests for *Salmonella* in bovine carcasses (DIPOA enforcement sampling), bovine carcass testing for generic *E. coli,* and testing for *Listeria spp.* (food contact surfaces and environment) for RTE products from meat establishments. The bimonthly audits were not implemented by CGAL/DIPOA and only three audits were conducted by CGAL since June 28, 2005.
- The Laboratory Quality Assurance (QA) officials performed an internal audit September 3 through 29, 2007, that covered a 1-year period. A total of 10 non-compliances were observed, including the following:
- No personnel training program; no calibration records for thermometers, ovens, standard weights, or reference weights; no SOP for equipment; lack of identification of environmental safety issues; no evidence of equipment returned after repair; and lack of original certificates for reference standards.
- A follow-up audit was performed on the previously issued Corrective Action Reports (CARs) on April 8, 2008, by the QA officials. Only two of the 10 non-compliances identified had been corrected and laboratory officials disagreed with two other non-compliances in the QA official's findings. Agreed-upon correction dates were not complied with for the rest of the identified non-compliances.
- There were no records to verify that the non-compliances identified were corrected, and no new target dates had been established for the corrective actions.

In two establishments non-compliances identified during the June 11 through July 22, 2008 audit were found to be corrected during the follow-up audit. A significant change had been made to the system of government oversight by moving the overall supervision and review responsibility from the local inspection authorities in the individual States to the Federal government. The food safety assessments had been conducted at all certified Brazilian establishments to ship meat products to the United

States. A Federal-level audit team had been created to conduct periodic audits of each exporting establishment. This team is also responsible for conducting follow-up audit on the corrective actions for all identified issues.

The following non-compliances were identified during the follow-up FSIS audit of Brazil's meat inspection system conducted in August 27 through September 5, 2008:

- One of the four establishments audited did not meet SSOP requirements.
- Two of the four establishments audited did not meet SPS requirements.
- Two of the four establishments audited did not meet HACCP requirements.
- One of the four establishments audited DIPOA inspection officials were not adequately verifying the establishment's HACCP plan for the second shift operations

Non-compliances identified during the August 27 through September 5, 2008 audit and during the June 11 through July 11, 2008 audit were found to be corrected during the current audit.

7. MAIN FINDINGS

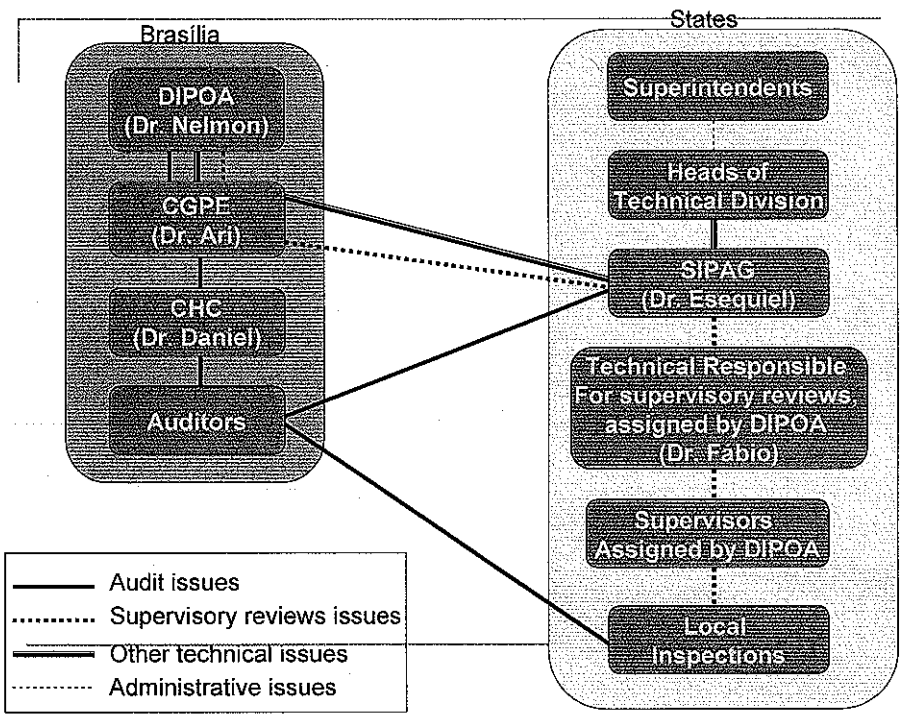
7.1 Government Oversight

There have been changes in the organizational structure and staffing since the previous audit in FY 2008.

The Department of Inspection of Products of Animal Origin (DIPOA) is under the Ministry of Agriculture, Livestock and Supply. DIPOA, Brazil's CCA, is responsible for providing government oversight for Brazil's meat inspection program. The International Export and Import Programs Coordination Division (CGPE) is one of the offices in DIPOA. DIPOA's responsibilities are to: Develop and manage export and import programs and policies including auditing procedures and certification of new establishments; manage the regulation and rule making process; develop and manage field implementation strategies for FSIS food safety requirements; and coordinate field inspection activities nationwide. Each State in Brazil has a Superintendent for the Federal Agriculture Office (SFA) at the State Level. Federal Superintendents are political appointees of the Minister of Agriculture. On June 16, 2005, Ministry Order Number 300 was issued creating the structure of Service of Federal Inspection of Products of Animal Origin at the State Level (SIPAG). SIPAG Offices operate within the scope of the national organization of inspection operations coordinated by DIPOA and are responsible for the coordination and performance of inspection operations in the establishments located within the State. Each SIPAG office has a Chief that is in charge of the Inspection of Agricultural Products.

In addition, there are regional offices operating within the States. These regional offices are officially referred to as: Regional Technical Units of Agriculture, Livestock, and Supplies (UTRA). UTRA offices were established to support the activities of SIPAG offices and their units for the collection and processing of data in relation to inspection, livestock protection and also to furnish supplies, transportation and staffing for SIPAG offices. ULTA offices perform mainly administrative functions.

This is the new organization chart.



7.1.1 CCA Control Systems

The CCA maintains legal and supervisory control of SIPAG offices to ensure uniform implementation of inspection activities in all States containing U.S.-certified establishments.

DIPOA maintains records of audits conducted by their audit staff and evaluates the audits of each establishment's self control programs, the performance evaluation of the in- plant inspection team and all supporting documentation for export health certificates. The periodic supervisory audits (bimonthly) are carried out by the auditors identified by CGPE under the control of SIPAG offices in each State.

7.1.2 Ultimate Control and Supervision

CGEP/DIPOA conducts audits of 40 % of the export establishments in each State, every six months. The CGEP/DIPOA audit team audits the SIPAG offices, establishment programs, and implementation of inspection programs within the establishments and the export health certificates with all supporting documentation produced by the veterinarian of the establishment. This same audit system is used to evaluate the performance of the inspection staff in the establishments.

Periodic supervisory (bimonthly) reviews, including assessing and evaluating job performance of the veterinary inspector in-charge, are conducted by the auditors under the direction of SIPAG office in each State.

7.1.3 Assignment of Competent, Qualified Inspectors

Veterinary Inspectors: Veterinarians must possess a degree in veterinary medicine; submit an application for and pass a Civil Service test; pass a written test for initial training for theory/classroom training; and undergo on-the-job training for three to six months. Newly hired veterinarians are on probation for two years and are evaluated every six months during the probationary period.

Agents Non-Veterinary Post-mortem Inspectors: Agents must possess an equivalent to a High School degree; submit an application for and pass a Civil Service test; pass a written test for initial training for theory/classroom training; and undergo on-the-job training for three to six months. Newly hired agents are on probation for two years and are evaluated every six months during the probationary period.

All establishments were staffed with full-time veterinarians and non veterinary inspectors. Continuous daily inspection was provided for all certified slaughter and processing establishments. All inspection officials have received the formal training in the principles of HACCP/Pathogen Reduction.

7.1.4 Authority and Responsibility to Enforce the Laws

Records of Non Conformity (RNC) are issued for compliance deficiencies. An action plan must be submitted by the establishment addressing the non conformities identified during periodic supervisory reviews and DIPOA audits. The veterinarian in-charge of the establishment must evaluate and approve the action plan. The SIPAG office also evaluates the action plan and approves or disapproves the action plan and returns it to the veterinarian in-charge. The veterinarian in-charge verifies corrective actions and upon completion, returns the action plans, with verification dates, to SIPAG. Repeated noncompliance and failures to meet export requirements may, and have, led to suspension of the establishment's ability to export to the U.S. and other countries. Suspensions are issued by the CCA (DIPOA) with input from the veterinarian in-charge and the respective SIPAG office. Enforcement actions, mainly fraud, are handled through the legal system. Supporting documentation is presented to the Police and is handled through the court system. Fines are levied by DIPOA through the legal system (criminal court).

The sanitation, slaughter, and processing inspection procedures, and the standards and legal authority to enforce these requirements, are outlined and specified in a Brazil inspection law referred to as *Regulations for the Inspection of Industrial Sanitation for Products of Animal Origin (RIISPOA)*. The CCA has the authority and responsibility to ensure the enforcement of the inspection laws, and it has developed inspection policies and procedures by adopting FSIS inspection procedures to ensure effective enforcement of U.S. requirements. Circular 540/2006, implemented August 8, 2006, provides SIPAG with the authority to issue fines and other penalties to establishments for repetitive non-compliances identified by the State supervisor during periodic supervisory reviews.

7.1.5 Adequate Administrative and Technical Support

The Department of General Coordination of Laboratory Support at the Agriculture Ministry, Coordenação-Geral de. Apoio Laboratorial – (CGAL/SDA/MAPA) is the

oversight body that coordinates laboratory activities and conducts audits of government and private laboratories. There has been a system in place for the selection of auditors trained in ISO-17025 principals to conduct audits of residue laboratories since September 2007.

Residue laboratories: All auditors are employees of the Ministry of Agriculture. Audits started in September of 2007 to meet the yearly audit requirement for 2007. Microbiology laboratories: A similar system is in place and coordinated by CGAL to audit all government and private microbiology laboratories twice per year.

7.2 Headquarters Audit

The auditor conducted a review of inspection system documents at the headquarters in Brasilia. 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 United States.
- Training records for inspectors and laboratory personnel.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Sanitation, slaughter and processing inspection procedures and standards.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

Concerns identified as a result of examination of these documents will be reported in other sections of the report.

7.3 Audit of Local Inspection Sites

SIPAG offices are responsible for direct implementation of U.S. requirements and inspection oversight activities in establishments certified to produce products destined for export to the U.S. The auditor conducted reviews of the inspection offices at the 11 establishments audited to assess the effectiveness of the delivery and implementation of inspection programs. The veterinarian in-charge of each establishment audited was interviewed and the following records were reviewed:

- Internal audit reports conducted by CGPE.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training programs and records for inspectors.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with disease conditions and of inedible and condemned materials.
- Export product inspection and control.

- Enforcement records, consumer complaints and control of noncompliant product.
- Microbiology sampling and laboratory analyses for residues.
- Inspection records which included verification of the establishment's HACCP, SSOP, SPS, humane handling and slaughter of livestock, and SRM's control programs.
- Guidelines for testing for *Salmonella* and *E.coli.* testing in raw product.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Performance evaluation procedures and records.
- Conflict of interest polices and records.

Concerns identified as a result of examination of these documents will be reported in other sections of the report.

8. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of 11 establishments (nine slaughter/processing establishments and two processing establishments).

Specific non-compliances are noted in the attached individual establishment review forms.

9. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

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

One government residue laboratory was reviewed: No non-compliances were noted.

Non-compliances identified during the June 11 through July 22, 2008 audit were found to be corrected during the current audit.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test United States samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements.

One private microbiology laboratory was reviewed: No deficiencies were noted.

Non-compliances identified during the June 11 through July 22, 2008 audit were found to be corrected during the current audit.

10. SANITATION CONTROLS

As stated previously, the FSIS auditor focused on five areas of risk to assess Brazil's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of establishments and except as noted elsewhere in this report, Brazil's 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 practices, and good product handling and storage practices.

In addition, Brazil'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.

No non-compliances were noted.

10.1 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 two establishments were found to not meet the FSIS regulatory requirements.

Specific non-compliances are noted in the attached individual establishment review forms.

10.2 Sanitation

In three of the 11 establishments, some of the sanitation performance standards (SPS) requirements were not met.

Specific non-compliances are noted in the attached individual establishment review forms.

11. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, humane handling and humane slaughter, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Brazil's inspection system had adequate controls in place.

No non-compliances were noted.

There have been no outbreaks of animal diseases with public health significance since the last FSIS audit.

12. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviews is Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures; ante-mortem disposition; post-mortem inspection procedures; post-mortem disposition; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

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

12.1 HACCP Implementation.

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of the 11 establishments. One of the 11 establishments audited, had not adequately implemented their HACCP plan.

Specific non-compliances are noted in the attached individual establishment review forms.

12.2 Testing for Generic *E. coli*

Brazil has adopted the FSIS requirements for generic *E. coli* testing.

Eight of the 11 establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in nine slaughter establishments.

12.3 Testing for *Listeria monocytogenes*

Five of the 11 establishments audited were producing ready-to-eat products for export to the United States and were therefore required to meet the testing requirements for *Listeria monocytogenyes.* In accordance with United States requirements, the HACCP plans in these establishments had been reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to occur.

No non-compliances were noted.

13 RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls 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.

One government residue laboratory was audited: No non-compliances were noted.

Brazil's National Residue Testing Plan for 2009 was being followed and was on schedule.

14. 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*.

14.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments. All establishments were staffed with full-time veterinarians and non-veterinary inspectors. Continuous daily inspection was provided for all certified slaughter and processing establishments.

No non-compliances were noted.

14.2 Testing for *Salmonella*

Brazil has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measure(s).

- Establishment employees collect *Salmonella* carcass samples.
- *Salmonella* carcass samples are analyzed by private laboratories.
- Brazil suspends an establishment the third time it fails to meet a *Salmonella* performance standard.

Nine of the 11 establishments audited were slaughter establishments and 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 all nine establishments.

No non-compliances were noted.

14.3 Species Verification

No non-compliances were noted.

14.4 Periodic Supervisory Reviews

During this audit it was found that in all establishments visited, periodic supervisory (bimonthly) reviews of certified establishments were being performed and documented as required.

No non-compliances were noted.

14.5 Inspection System Controls

The CCA was required to demonstrate that all government inspectors assigned to establishments certified for U.S. export were being paid by the government.

The CCA uses both veterinary inspectors and non-veterinary agents who are employed by the Ministry of Agriculture (DIPOA) and some employed and paid by the Municipalities. Supervision and oversight is provided by the National Government.

Records of salary payment for federal and municipal inspectors and receipts for payment by inspectors to the establishment for meals and transportation were reviewed.

No non-compliances were noted.

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 with the following exceptions:

- In two of the 11 establishments, some SSOP requirements were not met.
- In three of the 11 establishments audited, some SPS requirements were not met.
- In one of the 11 establishments audited, one or more HACCP problems were reported.
- In one of the 11 establishments audited DIPOA inspection officials were not adequately reviewing and determining the adequacy of corrective actions taken when a deviation from a Critical Limit occurred.

In addition, 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 counties for further processing.

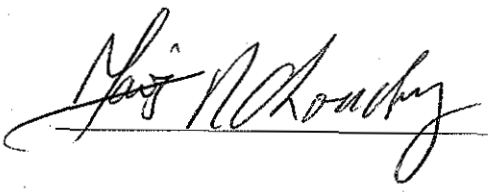
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

15. CLOSING MEETING

An closing meeting was held on August 14, 2009, in Sao Paulo with the CCA. At this meeting, the preliminary findings from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Faizur R. Choudry, DVM
Senior Program Auditor



15. ATTACHMENTS

Individual Foreign Establishment Audit Forms
Foreign Country Response to Draft Final Audit Report (when it becomes available)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Ferrira International Ltda. Tres Rios Rio de Janeiro	7/16/2009	SIF 13	Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
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19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment SIF 13, Ferrira International Ltda, Tres Rios, Rio de Janeiro, Brazil; July16, 2009. Processing

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

NOTE: All previous audit findings dated June 13, 2008, have been corrected.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry, DVM	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
JBS S/A Barretos, Sao Paulo	7/27-28/2009	SIF 76	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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25. General Labeling	
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Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

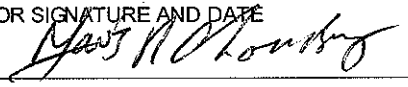
Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment SIF 76, JBS, Barretos, Sao Paulo, Brazil; July 27-28, 2009. Slaughter/Processing

39/51. Numerous open spaces at the junctions of walls and ceilings in the can corned beef storage room were not sealed to prevent the entry of insects, rodents, and other vermin. No vermin presence was observed. The establishment Sanitation Performance Standards (SPS) monitoring records and DIPOA inspection officials SPS verification records were reviewed that indicated no observation for the detection of this deficiency. Inspection officials took corrective actions immediately and noncompliance was issued. Establishment officials proposed correction date to DIPOA inspection officials. [Regulatory references: [Regulatory references: 9 CFR 416.2(a) (b) and 416.17]

NOTE: All previous audit findings dated July 3-4, 2008, have been corrected.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry, DVM	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Pampeano Alimentos S/A Hulha Negra, Rio Grande de Sul	08/5-6/2009	SIF 226	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
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40. Light	
41. Ventilation	
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44. Dressing Rooms/Lavatories	
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46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment SIF 226, Pampeano Alimentos S/A. Hulha Negra, Brazil; August 5-6, 2009. Processing

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

NOTE: All previous audit findings dated July 8-9, 2008, have been corrected.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry, DVM	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Bertin Ltda Lins, Sao Paulo	7/30-31/2009	SIF 337	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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Part D - Continued Economic Sampling	Audit Results
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49. Government Staffing	
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51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment SIF 337, Bertin Ltda, Lins, Sao Paulo, Brazil; July 30-31, 2009. Slaughter/Processing

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

NOTE: All previous audit findings dated June 30 and July 1, 2008, have been corrected.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry, DVM	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
JBS S/A Andradina, Sao Paulo	7/20-21/2009	SIF 385	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment SIF 385, JBS, Andradina, Sao Paulo, Brazil; July 20-21, 2009. Slaughter/Processing

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

NOTE: All previous audit findings dated September 1-2, 2008, have been corrected.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry, DVM	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Industria e Comercio de Carnes Minerva S.A Barretos, Sao Paulo	7/28-29/2009	SIF 421	Brazil
	5. NAME OF AUDITOR(S) Faizur R. Choudry, DVM		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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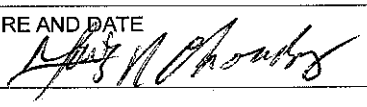
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment SIF 421, Industria e Comercio de Carnes Minerva S.A, Sao Paulo, Brazil; July 28-29, 2009. Slaughter/Processing

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

NOTE: All previous audit findings dated September 3, 2008, have been corrected.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry, DVM	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Marfrig Alimentos S/A Tangara da Serra, Mato Grosso (MG)	7/10/2009	SIF 1751	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment SIF 1751, Marfrig Alimentos S/A, Tangara da Serra, Brazil; July10, 2009. Slaughter/Processing

10/51. Fore shank of long beef carcasses were being cross-contaminated by non-product contact surfaces (hand washing facility) at the carcass trimming station. Establishment officials took immediate corrective action to prevent the cross contamination of product, and further preventive measure to relocate the sink was proposed to DIPOA inspection officials. [Regulatory references: 9 CFR 416.13 and 416.17]

14/51. The establishment did not include Specified Risk Materials (SRMs) removal of eyes, brain, tonsils and distal ileums, and spinal card in the hazard analysis to determine the food safety hazards reasonably likely to occur in the process and identify preventive measures that the establishment could apply to control those hazards. Procedure for handling SRMs were included in the Pre-requisite program. Establishment reassessed the HACCP plan to include SRMs in its Hazard Analysis and addressed as hazard reasonably likely not to occur. DIPOA inspection officials verified the corrective actions taken by the establishment on the same day of audit. [Regulatory references: 9 *CFR 417.2(a) (1) and 417.8*]

39/51. Open spaces at the junctions of walls and ceilings at the one side of wall in the dry-storage room were not sealed to prevent the entry of insects, rodents, and other vermin. No evidence of vermin presence was observed. The establishment Sanitation Performance Standards (SPS) monitoring records and DIPOA inspection officials SPS verification records were reviewed that indicated no observation for the detection of this deficiency. Establishment officials took corrective actions immediately. DIPOA inspection officials verified the corrective actions taken by the establishment on the same day of audit. [Regulatory references: 9 CFR 416.2(a) (b) and 416.17]

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry, DVM	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Marfrig Alimentos S/A Promissao, Sao Paulo	8/11/2009	SIF 2543	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment SIF 2543, Marfrig Alimentos S/A, Promissao, Sao Paulo, Brazil; August 11, 2008. Slaughter/Processing

51. DIPOA inspection officials were not reviewing and determining the adequacy of corrective actions taken when a deviation from a Critical Limit B-1(fecal material, ingesta) occurred on July 29, August 5-7, 2009. DIPOA inspection verification HACCP records indicated that inspection officials had reviewed and determined the corrective actions taken on August 4, 2009, when this CCP was only selected at random for verification. DIPOA official from Brasilia asked SIPAG (State) officials to conduct a follow-up supervisory review to ensure that inspection officials fully understand and comply with HACCP record keeping requirements. [Regulatory references: 9 CFR417.8(c)]

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry, DVM	Faiz R Choudry

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Marfrig Alimentos Ltda Promissao, Sao Paulo	8/10/2009	SIF 3712	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] 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
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Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
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19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
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59.	

60. Observation of the Establishment

Establishment SIF 3712, Marfrig Alimentos S/A, Promissao, Sao Paulo, Brazil; August 10, 2009. Slaughter/Processing

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry, DVM	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Marfrig Alimentos S/A , Bataguassu Mato Grosso do Sul	7/22/2009	SIF 4238	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment SIF 4238, Marfrig Aimentos, Bataguassu, MG do Sul, S/P, Brazil; July 22, 2009. Slaughter/Processing

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

NOTE: All previous audit findings dated July 16-17, 2008, have been corrected.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry, DVM	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Bertin S/A Compo Grande Mato Grosso Do Sul	7/23-24/2009	SIF 4400	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Faizur R. Choudry, DVM		[X] ON-SITE AUDIT [ ] 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
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
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24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	X
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

Establishment SIF 4400, Bertin S/A, Compo Grande, Mato Grosso Do Sul, Brazil; July 23-24, 2009. Slaughter/Processing

10/51. Skinned tails of beef carcasses were being cross-contaminated by contact with a hide puller chain, which is a non-product contact surface at the hide removal station. Records indicated that DIPOA inspection officials identified this noncompliance on July 20, 2009. Inspection officials took corrective actions immediately and another noncompliance was issued. Establishment personnel immediately followed-up with 100 % monitoring of employee to assure he follows correctly sanitary dressing procedures. Noncompliance record indicated that establishment took corrective actions and met 9 CFR 416.15 regulatory requirements. Employee received training for the sanitary dressing procedures specially designed for the removal of hide. DIPOA inspection officials verified the training record at the end of the audit. [Regulatory references: 9 CFR 416.13 and 416.17]

47/51. An employee in the boning room was contacting non-food-contact surfaces with his hands and meat hook and handling edible product without washing his hands or sanitizing the hook, resulting in cross contamination of edible product. Records indicated that neither DIPOA inspection officials nor establishment personnel have detected this non-compliance. This is a random non-compliance and I did not observe any pattern on the DIPOA inspection official's failure to detect non-compliance. Establishment officials took corrective actions immediately and employee's training to comply with GMP procedures was scheduled. [Regulatory [Regulatory references: 9 CFR 416.5(a)(b) and 416.17]

]

Dr. Faizur R. Choudry, DVM	62. AUDITOR SIGNATURE AND DATE