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

DEC 7 2005

Dr. Nelmon Oliveira da Costa
Director, Department of Inspection
for Products of Animal Origin
Ministry of Agriculture and Provisions
Division of International Commerce Control
Ministry of Agriculture Annex
Block D, 4th Floor, Room 436A
70043-900 Brasilia DF, Brazil

Dear Dr. Costa:

The Food Safety and Inspection Service (FSIS) conducted an on-site enforcement audit of Brazil's meat inspection system June 2 through June 23, 2005. Comments from Brazil have been included as an attachment to the final report. Enclosed is a copy of the final report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 720-3781, at (202) 690-4040 or electronic mail at sally.white@fsis.usda.gov.

Sincerely,

Sally White JD

Sally White, Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc:
Alan Hraspsky, Agricultural Counselor, US Embassy, Brasilia
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Country File

FINAL

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

June 2 through June 23, 2005

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

BSE	Bovine Spongiform Encephalopathy
CCA	Central Competent Authority
DFA	Delegate for Federal Agriculture Office at State Level (Delegacia Federal de Agricultura do Estado)
DIPOA	Department of Animal Product Inspection
E. coli	*Escherichia coli*
FSIS	Food Safety and Inspection Service
MAPA	Ministry of Agriculture, Livestock and Supply (Ministério da Agricultura, Pecuária e Abastecimento)
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
Salmonella	*Salmonella* species
SDA	Agriculture and Livestock Defense Secretariat (Secretaria de Defesa Agropecuária)
SIPA	Animal Product Inspection Service (Serviço de Inspeção de Produtos de Origem Animal)
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedures
U.S.	United States
VMO	Veterinary Medical Officer

1. INTRODUCTION

The audit took place in Brazil from June 2 through June 23, 2005.

An opening meeting was held on June 2, 2005, in Sao Paulo with the Central Competent Authority (CCA), which is the Department of Animal Product Inspection (Departamento de Inspeção de Produtos de Origem) (DIPOA). At this meeting, the Food Safety and Inspection Service (FSIS) audit team confirmed the objective and scope of the audit, the audit itinerary, and requested additional information needed to complete the audit of Brazil's meat inspection system.

The audit team was accompanied during the entire audit by representatives from DIPOA and/or representatives from the Animal Product Inspection Service (Serviço de Inspeção de Produtos de Origem Animal) (SIPA).

2. OBJECTIVE OF THE AUDIT

This audit was a follow-up audit of March/April 2005 enforcement audit. The objective of the audit was to determine if Brazil had implemented corrective actions with regard to government oversight including payment of inspectors and conflict of interest issues, six establishments selected for audit, and three laboratories selected for audit.

In pursuit of the objective, the following sites were visited: the headquarters (temporarily moved to Sao Paulo) of DIPOA, three SIPA offices located in three Federal Agriculture Offices at State Level (Minas Gerais, Rio de Janeiro, and Sao Paulo), one government residue testing laboratory, two private microbiological testing laboratories (LACI, and SFDK), two meat processing establishments, and four slaughter and processing establishments.

Competent Authority Visits			**Comments**
Competent Authority Visit	Headquarters	1	Brasilia
	SIPA	3	Federal Agric Offices at State level
Residue Laboratories		1	
Microbiology Laboratories		2	
Processing Establishments		2	
Slaughter and Processing Establishments		4	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA and SIPA officials to discuss strategic corrective action plans including implementation and delivery strategies. The second part involved an audit of a selection of records at CCA and three SIPA offices. The third part involved on-site visits to six establishments selected by CCA: four slaughter and processing establishments, and two processing establishments. The fourth part involved visits to three laboratories selected by CCA: one government residue laboratory, and two private microbiology laboratories. These three laboratories provide laboratory supports for all the six establishments selected by CCA.

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 (SSOP) and Sanitation Performance Standards (SPS), (2) animal disease controls, Bovine Spongiform Encephalopathy (BSE), (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) programs, a testing program for generic *E. coli*, and a testing of Ready to Eat Products (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella* in Raw Products, daily inspection, monthly reviews, and inspection system controls. Brazil's strategic corrective action plans were assessed by evaluating these five risk areas.

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

At the opening meeting, the audit team explained to the CCA officials 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, supervisory monthly reviews of 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, Salmonella*, and government oversight/enforcement activities.

Equivalence determinations are those that have been made by FSIS for Brazil under provisions of the Sanitary/Phytosanitary Agreement. Brazil has adopted the FSIS regulatory requirement for *Salmonella* testing for raw products with the exception of the following equivalent measures:

1. Establishment employees collect samples.
2. Private laboratories analyze samples.

3. An establishment is suspended the first time it fails to meet a *Salmonella* performance standard.

4. LEGAL BASIS FOR THE AUDIT

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

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

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address: http:/www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp

The following deficiencies were identified during the September 2004 routine audit:

Sanitation Controls

In six establishments, SSOP requirements were not effectively implemented:

- Several small pieces of rail dust on two carcasses were observed at the final trim in the boning room.
- Boxed product had holes punctured in it from a forklift. The product inside had been contaminated.
- Product was contacting the floor in the restricted area of the frozen cooked beef cooler.
- Dripping and beaded condensate from the refrigeration unit, not cleaned and sanitized, was dripping on partially covered exposed product in the cooler.
- Food product contact surface of utensil (shovel) was in contact with the floor in the processing area.
- Plastic bags with edible product had a hole punctured in it from a forklift. The product inside had been contaminated. There was not a process in place to control the product.
- Employee who was assigned to work with edible product was contaminating carcasses by handling product that had been in contact with the floor and with an inedible product container without washing his hands.

In seven establishments, SPS requirements such as sanitary operations, maintenance of equipments and facilities, and pest control were not effectively implemented:

- Walls within the facility were damaged or had holes in them from forklifts.
- Boxed product within the facility was covered with frozen condensate or ice.
- Unidentified plastic wrapped poultry product was stored on top of boxes.
- Heavily beaded condensate was observed over boxed product way.
- No sanitizers were available in the inspection room to sanitize the knife or saw used for inspection.
- Gaps were observed at the bottoms and sides of doors in the shipping room.

Residue Controls

- In both government laboratories, there was no calibration of equipment and no inter-laboratory check sample program.
- Brazil is not using the FSIS method for DES analysis.

Enforcement Controls

- Auditor was informed that payment of inspectors is handled by Federal Agriculture Offices at State level.

During March/April 2005 enforcement audit, significant, serious deficiencies were found in all aspects of government oversight, payment of inspectors, conflict of interest issues, laboratory operations, and establishment operations. As a result, Brazil voluntarily suspended all its establishments certified for export to the United States in April 2005.

6. MAIN FINDINGS

6.1 Government Oversight

The office of DIPOA in Brasilia is under the umbrella of the Ministry of Agriculture, Livestock and Supply (Ministério da Agricultura, Pecuária e Abastecimento (MAPA)). The Director, DIPOA reports to the office of Agriculture and Livestock Defense Secretariat (Secretaria de Defesa Agropecuária (SDA)) which is equivalent to USDA, office of Under Secretary for Food Safety. DIPOA, Brazil's CCA, is responsible for providing government oversight of Brazil's meat inspection programs. The International Export and Import Programs Coordnation Division is one of the offices in DIPOA and it has broad responsibility: develop and manage export and import programs and policies inluding auditing procedures and certification of new establishments; manage 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 Delegate for Federal Agriculture Office at State Level (Delegacia Federal de Agricultura do Estado (DFA)). Federal Delegates, also referred to as Federal Superintendents, are polical appointees of Minister of Agriculture. SIPA is located in the office of DFA. The Chief of SIPA is responsible for direct implementation of U.S. requirements and inspection oversight activities over establishments certified for U.S. export.

6.1.1 CCA Control Systems

The CCA has developed new inspection policies and procedures in its strategic plans to ensure an organizational structure and staffing that facilitate the effective supervision of inspection activities at the six establishments selected for audit. Through Brazil rule making process, the CCA has adopted and implemented FSIS inspection policies and procedures (FSIS Directive 5000.1, revision 1). In addition, the CCA has revised its supervisory monthly review and auditing procedures to include accountability, trend analysis, and enforcement options. However, the CCA has not implemented the new supervisory monthly review and auditing procedures. Therefore, FSIS was unable to measure the effectiveness of the implementation of the new supervisory monthly review and auditing procedures.

The CCA did not have direct oversight of the laboratories. The national residue coordinator, who is responsible to develop, plan, and direct Brazil residue programs, does not report to CCA. The national laboratory coordinator, who is responsible for oversight of all laboratories including microbiology and residue laboratories, does not report to CCA.

6.1.2 Ultimate Control and Supervision

The CCA has written control procedures and implementation strategies in its strategic plans to enhance and facilitate effective supervision of inspection activities at six establishments. The CCA has developed new supervisory monthly review and auditing procedures that will enhance and facilitate effective supervision. However, the CCA is scheduled to implement the new supervisory and auditing procedures at a later date. Therefore, FSIS was unable to measure the implementation of these procedures at this time.

6.1.3 Assignment of Competent, Qualified Inspectors

CCA was able to demonstrate the existence of training programs to ensure continued inspector skills and competency. The CCA received about R$1,240,000 ($500,000) to improve its training programs. The CCA has put in place a national training policy that specifies short and long term training programs for all inspection officials. The short term training includes HACCP/SSOP training for all inspection officials provided by consultants, and new inspection procedures training for all inspection officials. The supervisory and auditing procedures that were developed by CCA can be used to document and determine training needs of inspectors if implemented properly. The CCA planned to use data generated from supervisory monthly review and audit to determine training needs of inspectors. CCA plans to develop individualize long term training

programs that will be based on needs of inspectors. To deliver these training, the CCA plans to have training teams that will specialize to deliver the required training to inspectors whenever is needed. Also, the CCA has national training programs in place for all newly hired inspectors. However, the CCA is scheduled to implement long term training programs in about 2-3 months. Therefore, FSIS was unable to measure the implementation of long term training programs.

The CCA has started the employment process for 100 veterinary medical officers and 210 inspectors to be assigned to establishments certified to export to the U. S.

6.1.4 Authority and Responsibility to Enforce the Laws

The sanitation, slaughter and processing inspection procedures and standards, and legal authority to enforce these requirements, are outlined and specified in Brazil inspection law referred to as RIISPOA in section 1.283, article 876. The CCA has the authority and responsibility to enforce the inspection laws, and it has developed new inspection policies and procedures by adopting FSIS inspection procedures to ensure effective enforcement of U.S. requirements in the six establishments selected for review. Although elements of adopted FSIS inspection policies and procedures (FSIS Directive 5000.1, revision 1) were implemented, it is too early to generate enough documentation, such as inspection schedules, inspection verification records, and noncompliance records to measure the effectiveness of implementation.

6.1.5 Adequate Administrative and Technical Support

The CCA has a procedure in place to coordinate laboratory activities with General Coordinator for Laboratories (CGAL). However, the CCA does not have direct oversight of CGAL or the laboratories and CGAL do not report directly to the CCA. The CCA does not provide oversight to assure that appropriate methodology is being used. Although CGAL has created a new independent audit division that conducts audits of laboratories, and provides laboratory oversight and coordination, in the two microbiological laboratories audited, CGAL did not provide appropriate oversight to ensure that FSIS methods were being used to analyze U.S. samples for *Listeria monocytogenes* and *Salmonella*.

The CCA and CGAL have written procedures in place in their strategic plans to provide training and oversight of the three laboratories selected for review. CGAL has developed laboratory audit methodology and procedures, different levels of training requirements for laboratory auditors and analysts, and new criteria for use in the laboratory approval process, and it has implemented audit methodology and procedures in three laboratories selected for audit. However, CGAL has not implemented new training procedures and new criteria for the laboratory approval process. Therefore, FSIS was unable to measure the effectiveness of implementation of these procedures and process.

6.2 Headquarters Audit

The audit team assessed headquarters to determine whether CCA has effective strategic corrective action plans to address the deficiencies identified during the last enforcement audit. In pursuit of this FSIS interviewed key officials specifically to verify whether

CCA has developed and implemented corrective action plans: (1) to ensure an effective organizational structure and staffing that will result in uniform implementation of U.S. requirements, (2) that will result in effective control and supervision over official activities of all government employees, certified establishments, and laboratories testing product destined for U.S., (3) to ensure the assignment of competent, qualified inspectors that are paid by the government and receive no benefits from the establishments, (4) to enforce U.S. requirements, (5) to ensure adequate administrative and technical support to operate the inspection system. Various supporting records and documents related to inspection programs and policies were examined and verified to confirm CCA officials' responses and claims.

6.3. Audit of SIPA and Local Inspection Sites

SIPA offices are responsible for direct implementation of U.S. requirements and inspection oversight activities over establishments certified for U.S. export. The audit team conducted reviews of three SIPA offices to determine the effectiveness of delivery of newly developed inspection policies and programs, and implementation strategies. In pursuit of this, FSIS inverviewed key officials in three SIPA offices that are responsible for managing the delivery of inspection in six establishments selected for audit. The following SIPA offices were audited:
Office in Sao Paulo, Sao Paulo State
Office in Belo Horizonte, Minas Gerais State
Office in Rio de Janerio, Rio de Janerio State
Various supporting records and documents related to field inspection oversight activities were examined and verified to confirm SIPA officials' responses and claims.

In addition, FSIS interviewed two Veterinary Medical Officers (VMOs) assigned to one of these six establishments selected for audit to determine whether (1) CCA has trained VMOs on how to implement the new inspection policies and programs, (2) VMOs have a clear understanding of the new inspection policies and programs, (3) VMOs are competent and have necessary skills to properly execute the new inspection policies and programs. Various supporting records and documents such as inspection schedules, inspection verification records, and noncompliance records were examined and verified to confirm VMOs' responses and claims. It is too early to generate enough of these records and documentation, therefore FSIS was unable to measure the effectiveness of implementation.

7. ESTABLISHMENT AUDITS

As a result of March/April 2005 enforcement audit findings, CCA selected six establishments that had implemented corrective actions to meet FSIS requirements for follow-up audit. The six establishments selected for audit consist of four slaughter and processing establishments, and two processing establishments. All six establishments had implemented corrective actions to address deficiencies identified during the March/April 2005 enforcement audit.

8. 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.

8.1 RESIDUE LABORATORY AUDIT

One government residue testing laboratory (LARA Pedro Leopoldo) that conducts residue tests on meat products destined for U.S. export was selected for audit. 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.

CCA had implemented corrective actions to address deficiencies identified during the Marc/April 2005 enforcement audit. CGAL has implemented the FSIS method to analyze samples for Diethylstilbestrol (DES)

8.2 MICROBIOLOGY LABORATORY AUDIT

Two private microbiological testing laboratories (LACI, and SFDK) that conduct tests on meat products destined for U.S. export were selected 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 U.S. samples, then FSIS evaluates compliance with the criteria established for the use of private laboratories under the FSIS PR/HACCP requirements.

The following deficiencies that were identified at LACI, a private microbiology laboratory during March/April 2005 enforcement audit were corrected:

- Samples of U.S. export product are now clearly identified.
- CGAL has implemented a new auditing procedure.
- There is improvement in the documentation of culture media preparation and controls, and temperature tracking of incubation units.
- There is improved security and maintenance of reference cultures.
- There are now controls used with sample analyses.
- Training procedures were in place for analysts to enhance their skills and competency.

One deficiency that had not been corrected was:

- Methods for detecting and confirming *Listeria monocytogenes* and *Salmonella* are not currently approved.

The following deficiencies that were identified at SFDK, a private microbiology laboratory during March/April 2005 enforcement audit were corrected:

- CGAL has implemented a new auditing procedure.
- There are now controls used with sample analyses.

One deficiency that had not been corrected was:

- Methods for detecting and confirming *Listeria monocytogenes* and *Salmonella* are not currently approved.

9. SANITATION CONTROLS

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

9.1 Sanitation Standard Operating Procedures

Each of six establishments selected for audit 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. During the last audit, all six establishments had deficiencies in implementation of SSOPs. During this audit, it was found that all six establishments had implemented corrective actions to address these deficiencies.

9.2 Sanitation Performance Standards

Each of six establishments selected for audit was evaluated to determine if the FSIS regulatory requirements for SPS were met according to the criteria employed in the United States' domestic inspection program. During the last audit, two out of six establishments had deficiencies in implementation of SPS requirements. During this audit, these two establishments had implemented corrective actions to address these deficiencies.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS audit team reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. During the last audit, four out of six establishments had deficiencies in implementation of BSE requirements. During this audit, these four establishments had implemented corrective actions to address these deficiencies.

These corrective actions include:

- The CCA has procedures in place to collect brain samples for BSE analysis for cattle dead on arrival at the establishment or that died inside the pen.
- The CCA has developed and implemented inspection verification procedures to ensure that the establishments are implementing procedures to remove Specific Risk Materials.
- Establishments have implemented a procedure including maintaining daily monitoring records to ensure that all SRMs are properly removed, segregated, identified, and disposed of in a manner to prevent cross contamination with edible products.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS audit team reviewed was Slaughter/Processing Controls. The controls include the following areas: humane handling and slaughter of animals, 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, implementation of a generic *E. coli* testing program in slaughter establishments, and a testing of Ready to Eat Products.

11.1 Humane Handling and Slaughter Procedure

During the last audit, four out of six establishments had deficiencies in post- mortem inspection procedures. During this audit, these four establishments had implemented corrective actions to address these deficiencies.

11.2 HACCP Implementation.

Six establishments selected for audit were 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.

During the last audit, all six establishments had deficiencies in the implementation of HACCP requirements. During this audit, all six establishments had implemented corrective actions to address these deficiencies.

11.3 Testing for Generic *E. coli*

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

Four of the six 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. During the last audit no deficiencies were observed. No deficiencies were observed during this audit.

11.4 Testing for *Listeria monocytogenes*

Two out of six establishments selected for audit were producing ready-to-eat products that are subject to the testing requirements for *Listeria monocytogenes*. During the last audit, two out of six establishments had deficiencies in implementation of *Listeria monocytogenes* requirements. During this audit, these two establishments had implemented corrective actions to address these deficiencies.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS audit team 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.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS audit team reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements, the testing program for *Salmonella* in raw products, daily inspection, monthly reviews, and inspection system controls.

13.1 Daily Inspection in Establishments

During the last audit, none of six establishments selected for audit had deficiencies in daily inspection requirements. During this audit, no deficiencies were observed.

13.2 Testing for *Salmonella*

Brazil has adopted the FSIS requirements for testing for *Salmonella* with the exception of the following equivalent measures:

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

Four establishments selected for audit were required to meet the above FSIS approved Sanitary and Phytosanitary equivalent measures for *Salmonella* testing and were evaluated according to the above criteria. During the last audit, four out of six establishments selected for audit had deficiencies in *Salmonella* testing of raw product for performance standard. During this audit, the four establishments had implemented corrective actions to address these deficiencies. However, two microbiological laboratories audited during this audit were not using the FSIS method for detecting and confirming *Salmonella.*

13.3 Species Verification

Brazil is exempt from species verification testing and is following all controls to maintain the exemption.

13.4 Monthly Reviews

The CCA has revised its supervisory monthly review procedures to include accountability, trend analysis, and enforcement action options, but it has not implemented these procedures at the time of this audit. Therefore, FSIS was unable to measure the effectiveness of implementation.

13.5 Inspection System Controls

Government of Brazil (GOB) was required to demonstrate that all government inspectors assigned to establishments certified for U.S. exports to perform inspection duties were being paid by government. Serious deficiencies were observed in payment of inspectors and conflict of interest issues during March/April 2005 enforcement audit. The CCA has corrective actions in place that include immediate and permanent solutions to resolve payment of inspector issues. Although the CCA still has contracted inspectors (inspectors working for and paid by municipal governments), it has implemented immediate corrective actions to resolve conflict of interest issues that were identified in the last enforcement audit. The CCA issued and sent circulars (policy memo) to all nine SIPAs. The circulars specifically address how SIPA chief should control, monitor, and manage payment of inspector to eliminate conflict of interest issues. According to the circulars, SIPAs will be held responsible and accountable if they do not implement necessary controls to eliminate conflict of interest issues.

The CCA is tentatively scheduled to implement permanent solutions in 3-4 months when all inspectors will be paid by Federal government of Brazil. The CCA's permanent solution in its strategic plan is to employ more Federal government inspectors to replace all contracted inspectors, and it has started employment process of about100 veterinary medical officers and 210 inspectors to be assigned to establishments certified to export to United States and to permanently replace contracted inspectors.

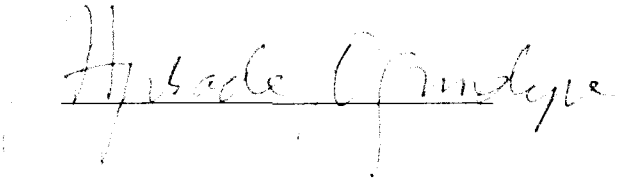
Controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other counties for further processing.

14. CLOSING MEETING

A closing meeting was held on June 23, 2005, in Sao Paulo with the CCA. At this meeting, the preliminary findings and conclusions from the audit were presented by the lead auditor.

The CCA understood the findings and responded that they will provide comments at later date.

AJ Ogundipe
Lead Auditor



15. ATTACHMENTS

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

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
Jack Link's Do brasil Ltda.Bertin Ltda Itopeva, Sao Paulo	06/03/2005	SIF 3673	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. 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 SSOPs 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	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	O
35. Residue	O
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. *Listeria Monocytogenes*	
59.	

60. Observation of the Establishment

Establishment # SIF 3673 Date: 06/03/2005 Processing Operation

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

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
F. Manzoor H. Choudry 5/11/05

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 frigorificos e Comercio de Alimentos Ltda. Sao Paulo, Sao Paulo	06/13,14/2005	SIF 2543	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. 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 SSOPs 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	O
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 # 2543 Date: 06/13,14/2005 Slaughter & Processing Operations

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	Faizur H. Choudry 8/11/05

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
Frisa Frigorifico Rio Doce S/A Nanuque Minas Gerais	06/09/2005	SIF 2051	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. 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 SSOPs 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	O
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 # 2051 Date: 06/09/2005 Slaughter & Processing Operations

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

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
Faizur H. Choudry 6/9/05

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
FRIBOI Ltda. Presidente Epitacio Sao Paulo	06/20/2005	SIF 0458	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. 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	O
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 # 458 Date: 06/20/2005 Slaughter & Processing Operations

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	Faizur R. Choudry 8/1/05

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	06/15,16/2005	SIF 0337	Brazil
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. 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	O
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 0337 Date: 06/15,16/2005 Slaughter/Processing Operations

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

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
Faizur H. Choudry 5/11/05

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
Ferreria International Ltd. Tres Rios Rio de Janeiro	06/07/2005	SIF 0013	BRAZIL
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. 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	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	O
35. Residue	O
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 0013 Date: 06/07/2005 Processing Operation

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	Faizur R. Choudry 8/11/05

Informal Translation:

Official Letter DIPOA, Dated Nove 16, 2005.

Mr. Counselor,

I request that you transmit to Mrs. Sally White, Director International Equivalence Staff - Office of International Affairs, FSIS, the following comments regarding the FSIS audit conducted in Brazil during the period of June 2- 23 2005:

(i) DIPOA, through the Special Assistant for Programs of Residues and Microbiology for Exported Products, has already developed a system for auditing both microbiology and residue laboratories;

(ii) The supervision system to identify trends of non conformity and also to evaluate the performance of the local team of inspection are already in place.

(iii) All DIPOA employees at the establishments as eligible as suppliers of raw matrial and exporters to the United States of America have been trained in the new inspection procedures as foreseen in Circulars numbers 175/CGPE/DIPOA/2005 and 176/CGPE/DIPOA/2005;

(iv) During the month of September of 2005 it was conducted the first auditing of the inspection system, focusing on those establishments eligible to export to the United States, the inspection team, the system of supervision and management of the State Services.

Finally, we would like to congratulate the FSIS team, headed by Mr. A. J. Ogundiope for the professionalism which they have conducted their aduting in Brazil.

Sincerely

Nelmon Oiiveira da Costa
Director, DIPOA/SDA/MAPA

Ilmo. Sr.
Conselheiro de Assuntos de Agricultura
Embaixada dos Estados Unidos da América
SES – Avenida das Nações. Quadra 801, lote 3
70403-900 Brasília –DF
Tel: 61 –312.7101 Fax: 61-312.7659

REPÚBLICA FEDERATIVA DO BRASIL
MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO - MAPA.
SECRETARIA DE DEFESA AGROPECUÁRIA - SDA
DEPARTAMENTO DE INSPEÇÃO DE PRODUTOS DE ORIGEM ANIMAL - DIPOA

Oficio Nº /DIPOA/05 **Brasília, 16 de novembro de 2005**

Senhor Conselheiro,

Apraz-me cumprimentá-lo e ao mesmo tempo solicita a V.Sa. a gentileza de retransmitir a Sra Sally White, Director International Equivalence Staff – Office of International Affairs do FSIS, os comentários a seguir, a respeito da auditoria realizada no Brasil, no período de 2 a 23 junho de 2005:

(i) o DIPOA, através da Assessoria Especial para Programas de Resíduos e Microbiologia para Produtos Exportados, já desenvolveu sistema de auditoria tanto para os laboratórios de microbiologia como para os que trabalham com *pesquisa de resíduos*;

(ii) O sistema de supervisão planejado para identificar tendências de não conformidades e também para avaliar o desempenho da equipe de inspeção local já foi implantado.

(iii) todos os funcionários do DIPOA lotados nos estabelecimentos habilitados como fornecedores de matéria-prima e exportadores para os Estados Unidos da América foram treinados nos novos procedimentos de inspeção previstos nas Circulares n°s 175/CGPE/DIPOA/2005 e 176/CGPE/DIPOA/2005;

(iv) durante o mês de setembro de 2005 foi realizada a primeira auditoria do sistema de inspeção, focalizando os , estabelecimentos habilitados, a equipe de inspeção, o sistema de supervisão e gerenciamento dos Serviços Estaduais.

Finalmente, gostaríamos de cumprimentar a equipe de auditores, liderada pelo Sr. A. J. Ogundiope pelo profissionalismo com que realizaram a auditoria.

Atenciosamente,

NELMON OLIVEIRA DA COSTA
DIRETOR DO DIPOA/SDA/MAPA

Ilmo. Sr.
Conselheiro de Assuntos de Agricultura
Embaixada dos Estados Unidos da América
SES – Avenida das Nações. Quadra 801, lote 3
70403-900 Brasília –DF
Tel: 61 –312.7101 Fax: 61-312.7659