

## Deficiencies found in Brazilian Meat Inspection System by the Food Safety and Inspection Service, USDA

 During the February 1998 audit, FSIS found that Brazil was using non-government paid inspectors in some establishments. Subsequent to this 1998 audit, FSIS advised Brazilian officials in two conference calls and in writing that use of non-government paid inspectors was not acceptable. In January 1999, Brazilian government officials informed FSIS that action had been taken to resolve this problem.

At the exit conference following the September 2003 audit, the FSIS auditor was informed that establishment-paid inspectors might be performing some official inspection duties in U.S.-certified establishments. In addition, the FSIS auditor was informed about a Brazilian law that permits use of establishment-paid personnel to work as auxiliaries in official establishments in certain situations.<sup>1</sup>

- During the 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.<sup>2</sup>
- The following deficiencies in the control and supervision of Brazil's meat inspection system were observed in the June/July 2008 FSIS audit:

DIPOA (Department of Inspection of Products of Animal Origin) officials did not demonstrate that they have effective oversight to ensure the accountability of the SIPAG (Service of Federal Inspection of Products of Animal Origin at the State Level) 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.<sup>3</sup>

<sup>&</sup>lt;sup>1</sup>Food Safety and Inspection Service, United States Department of Agriculture. Audit of Brazilian meat inspection system, November 10 – 20, 2003, page 4.

<sup>&</sup>lt;sup>2</sup> Food Safety and Inspection Service, United States Department of Agriculture. Audit of Brazilian meat inspection system, October 19 – November 7, 2005, p. 6.

<sup>&</sup>lt;sup>3</sup> Food Safety and Inpsection Service, United States Department of Agriculture. Audit of Brazilian meat inspection system, June 11 – July 22, 2008, pp. 7-8.

In June 2010, Brazil voluntarily suspended all exports to the U.S. when it was discovered by FSIS that Brazil's residue testing program was found to be deficient.<sup>4</sup> In fact, two product recalls were initiated in the U.S. because of excessive residues of the drug Ivermectin found in imported corned beef products.<sup>5</sup>

In the most recent audit posted by FSIS for Brazil that covered August/September 2010, FSIS made the following observations:

The (Central Competent Authority – CCA) was not able to demonstrate National regulatory oversight of the verification of the effectiveness of the product recall system, which consisted of regulations, policies and standard operating procedures. The CCA presented a circular to the FSIS audit team at the exit meeting on September 22,2010 that stated, "Weekly data will be consolidated by the central level, aiming at verification of the efficiency of procedures for "recall" executed by Brazilian companies. This information will be sent to FSIS to monitor the recall in the United States. However, the CCA did not present a procedural document stating how the recall verification procedures will be implemented or when the procedure will be implemented...

For many years, Brazil's meat industry has operated under the constraints of APHIS regulations in association to foot-and-mouth disease (FMD). In that treatments are typically sufficient to destroy any additional food-borne pathogens present, product safety has relied extensively on the correct application of these processes. During the current audit, it was noted that there were few strategies in place by the CCA to address the adulteration of raw ground beef (or beef components) by *E. coli* 0157:H7. Should changes in Brazil's disease status occur permitting export of this product type, it is FSIS' expectation that the CCA develop a control program for *E. coli* 0157:H7, which reflects a focus on methods to prevent contamination, the inclusion of government and industry verification testing, and any applicable training of its inspection personnel.<sup>6</sup>

<sup>4 &</sup>quot;Brazil Suspends Exports of Processed Meat to U.S. over Residues Controversy," MercoPress, June 2, 2010, see http://en.mercopress.com/2010/06/02/brazil-suspends-exports-of-processed-meat-to-us-over-residues-controversy

<sup>5</sup> see http://www.fsis.usda.gov/News & Events/Recall 033 2010 Release/index.asp; http://www.fsis.usda.gov/News\_& Events/Recall\_039\_2010\_Release/index.asp

<sup>&</sup>lt;sup>6</sup> Food Safety and Inspection Service, United States Department of Agriculture, Audit of Brazilian meat inspection system, August 31 – September 22, 2010, p. 17.