



January 2017

To Whom It May Concern:

Centro Internacional de Inversiones S.A, El Arreo, establishment 12 is admissible to export to the United States.

The establishment has official inspection by SENASA (Servicio Nacional de Salud Animal) and receives FSIS inspection annually.

El Arreo has implemented the HACCP plan and its pre requisites, which are in compliance with the official regulations and internal procedures. El Arreo has reassessed its HACCP plan in accordance with notice 65-07 for E. coli O157:H7.

The HACCP plan has 4 Critical Control Points.

- CCP1: Cero Tolerance of fecal contamination, ingesta or milk.  
Where – after the trimming and before carcass final wash.  
Frequency: 100 % of carcasses
- CCP2 – Organic Acid Spray  
Where – At the end of slaughter process, before chilling  
Frequency – Every 3 hours
- CCP3 - Carcass Chilling  
Where – Chillers  
Frequency – Every 3 hours at 24 hours after slaughter
- CCP4 – Refrigerated finished product temperature  
Where – before shipping  
Frequency – 2% of every shipment

The current microbiological controls and verification activities to prevent E. coli 0157H7 and other microbial contaminations are described below.

- Washing animals pre slaughter with potable and high pressure water, to remove soiled fecal material.
- Oesophageal plugging
- Tying and bagging the bung
- Individual inspection of each of the carcass discarding visible fecal contamination (PCC1), in charge of a HACCP inspector.
- The establishment has in place two microbial interventions which consist of an organic acid spray system in different steps of the process.
  - The first one is done in the slaughter floor to 100% of the carcasses. The organic acid used is Peroxiacetic acid at a concentration of 150 – 220 ppm,
  - The second organic intervention consists of a 2% lactic acid spray prior to boning.



(Both organic acid concentrations are in accordance to FSIS Transmittal sheet 7120.1 Amendment 18 – Safe and Suitable Ingredients Used in the Production of Meat and Poultry Products.)

- Verification activities include internal microbiological sampling:
  - Generic *E. coli*: 1 test per 300 carcasses. (Federal Register Vol 61, No 144) and random testing in trimmings. (Internal process control) (AOAC 998.08)
  - *E. coli O157:H7*: testing of trimmings of every production day. The sample consists of 60 excised samples, for a final weight of at least 325 grams for the analysis of *E. coli O157:H7* (RapidCheck for *E. coli O157* AOAC Licensed number 07201)
- Official testing by the MAG, Ministry of Agriculture and Livestock, includes testing of carcasses and trimmings for generic *E. coli*, *E. coli O157:H7* and non *O157:H7* shiga toxin producing *E. coli* (STEC), *Salmonella spp.*

The primals and subprimals produced at El Arreo are intended to be used as intact product, such as steaks or roasts or ready to eat products.

In addition it is important to mention that the trimmings are not exported or commercialized until the analysis results negative for *E. coli O157:H7*.

All the shipments containing trimmings sent to the United States have a document certifying that all the lots contained in the shipment have been tested in accordance to the Costa Rican testing program for *Escherichia coli O157:H7*, and are negative for this pathogen.

#### **Control of SRM's**

- Since January 2003, El Arreo included in the process the procedures to remove, segregate and dispose the SRM's, to assure that all the products exported to the United States are free of SRM's and safe for human consumption and reassessed its procedures to comply with requirements in FSIS Notice 56-07.
- On May 2016, WHO categorized Costa Rica as an negligible risk for BSE.
- Non-ambulatory animals are not permitted to enter the slaughter floor. These animals are humanely slaughtered on site and brain samples are collected by the official veterinary to analyze for BSE.
- All the ambulatory animals are slaughtered with a non-penetrative pneumatic stunner or by ritual slaughter; both methods leave the brain intact to prevent a contamination of brain SRM's to the rest of the carcass.
- Carcasses are processed as older than 30 months of age. All the SRM's are removed and disposed according to the Costa Rican regulation. These procedures were observed by USDA auditors and not objected.
- The products exported to the United States are either boneless or with bones that are NOT from the vertebral column.
- El Arreo has taken all the measures to assure that there is NO cross contamination of SRM's with the carcasses.

#### **Animal Welfare**

At CIISA – El Arreo we understand the moral and ethical duties associated with the care and movement animals in our facilities. CIISA is in fully compliance with all provisions of humane handling regulations including 9 CFR 313.

In support of our commitment, our plant has been educating its personnel since 2004 with training in the principles of livestock behavior, following the guidelines stated by Temple Grandin. For our training program we



utilize educational tools supplied by a number of industry sources as internal educational programs as well as external lectures and courses.

We are permanently self-audited by the QA department and the official Veterinary from SENASA.

### **Product Shelf Life**

The recommend product shelf life is as follows

- Frozen product is 1 year from the production date at 0°F.
- Refrigerated product – vaccum packed 90 days from production date at less than 40°F.

If you have further questions or concerns to this matter, please contact me at (506) 2587 1500 Ext 2440 or [mjarroyo@crciisa.com](mailto:mjarroyo@crciisa.com)

Sincerely,

María José Arroyo – HACCP Coordinator.