



June 1st, 2009

To Whom It May Concern:

Centro Internacional de Inversiones S.A, El Arreo, establishment 12 is admissible to export to the United States. On November 2007 the establishment reassessed the HACCP plan in accordance with USDA/FSIS notice 65-07.

The current microbiological controls and verification activities 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 a microbial intervention which consists of an organic acid spray system, which sprays 100% of the carcasses in the slaughter floor. The organic acid used is Peroxiacetic acid at a concentration of 150 – 220 ppm, as recommended in the FSIS Directive 7120.1 Amendment 1 – 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* (VIP EHEC Biocontrol, AOAC 996.09)
- Official testing by the MAG, Ministry of Agriculture and Livestock, includes testing of carcasses and trimmings for generic *E. coli*, *E. coli O157:H7*, *Listeria monocytogenes*, *Salmonella spp.*

In addition it is important to mention that El Arreo, establishment 12, is testing for *E. coli O157:H7* since 2002 and NEVER had a positive test.

All the shipments 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.
- 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. The Spinal cord and tonsils are completely removed. The rest of SRM's are sent to other process floor where they are processed for other markets different from United States, or disposed and sent to rendering. 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.

If you have further questions or concerns to this matter, please contact me at (506) 2239 0655 Ext 2440 or mjarroyo@crciisa.com

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Arroyo", is written over a horizontal line.

Maria José Arroyo – HACCP Coordinator.