

March 20, 2017

Mr. Michael Young
Acting Agriculture Secretary
United States Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Secretary Young:

On behalf of the advocacy group Food & Water Watch, I urge you to begin immediate proceedings to revoke the meat inspection equivalency determination for exports from Brazil. We are making this request in light of the recent revelations of massive corruption in the Brazilian meat inspection system and the chronic problems that Brazil has encountered in past equivalency audits conducted by the USDA's Food Safety Inspection Service (FSIS).

As you know, there have been news accounts describing corrupt practices used by some of the largest meatpackers in Brazil. Among those involved are BRF and JBS. JBS operates Brazilian plants that are certified to export meat and meat products to the United States.¹ Until recently, Brazil was restricted to exporting only processed meat products to the United States. Because of recent actions taken by USDA's Animal and Plant Health Inspection Service (APHIS) and FSIS, fresh meat exports from Brazil have resumed to the United States in spite of objections by Food & Water Watch and domestic livestock groups about animal health concerns and systemic shortcomings in the Brazilian meat inspection system.²

The current corruption investigation has uncovered the following egregious practices in Brazil:

- 1) Company officials influenced the Brazilian government over the assignment of certain federal inspectors to their plants;
- 2) Those inspectors were paid bribes to ignore that adulterated meat was put into commerce;
- 3) Uncooperative inspectors were assigned to other meat plants;
- 4) Some of the bribes were allegedly paid directly to the Brazilian Democratic Movement Party of Brazilian President Michel Temer;
- 5) Health certificates were falsified;

¹ See https://www.fsis.usda.gov/wps/wcm/connect/aff24ed9-4ae5-4570-bfa7-d9331c5a0914/Brazil_establishments.pdf?MOD=AJPERES&ContentCache=NONE

² See <http://www.foodandwaterwatch.org/news/food-water-watch-denounces-beef-imports-brazil-argentina>; <https://www.beefusa.org/newsreleases1.aspx?newsid=4210>; <https://www.r-calfusa.com/r-calf-usa-usdas-action-to-allow-raw-brazilian-beef-imports-is-purely-political-and-terribly-reckless/>

- 6) Rotten meat products were treated with acid to disguise the smell. The acid used is allegedly carcinogenic to humans;
- 7) Meat that was contaminated with Salmonella was exported to Europe.³

Thus far, it does not appear that any of the contaminated meat products reached the United States. On Friday, March 17, we did ask FSIS officials whether intensified port-of-entry inspection procedures have been instituted since news of the scandal in Brazil broke. We have yet to receive a reply to our question. In any event, the scandal underscores our previous concerns about the integrity and effectiveness of the Brazilian meat inspection system – an issue that has been raised by FSIS in the past.

For example, in 2005, FSIS conducted five separate equivalency audits in Brazil. One of the main reasons for the number of audits during that year was the discovery by FSIS that the inspectors working in the meat plants were not being paid by the federal government of Brazil and many of them were receiving subsidized meals, transportation, and medical care paid for by the companies they were inspecting, raising conflict of interest concerns.⁴ As a result of this finding and the systemic food safety deficiencies found in the Brazilian meat inspection system, meat exports to the United States were voluntarily suspended by Brazil.

In 2008, two audits were conducted by FSIS because Brazil suspended its exports due to systemic food safety issues found in its meat inspection system, and the fact that the meat inspectors were still not being paid directly by the Brazilian federal government.⁵

In 2010, Brazil temporarily suspended its processed meat exports to the United States due to findings by FSIS import inspection personnel of excessive residues of the drug ivermectin in samples taken at ports-of-entry.⁶ The audit conducted that year showed that there was lack of process control in the chemical control testing program for meat in Brazil.

In December 2012, Brazil belatedly reported its first case of bovine spongiform encephalopathy (BSE) in a steer that died in 2010.⁷ In its 2014 audit of the Brazilian meat inspection system,

³ See https://www.nytimes.com/2017/03/17/world/americas/brazil-food-companies-bribe-scandal-salmonella.html?_r=0; <http://in.reuters.com/article/brazil-corruption-food-idINL2N1GU0P4>

⁴ See <https://www.fsis.usda.gov/wps/wcm/connect/a744c7f7-f13e-4b5f-a0c5-f2e4c8af8792/Brazil2005.pdf?MOD=AJPERES>, p.16.

⁵ See <https://www.fsis.usda.gov/wps/wcm/connect/3490af10-c23d-4f16-b020-9404bcf36eb6/BrazilJune2008.pdf?MOD=AJPERES>;
<https://www.fsis.usda.gov/wps/wcm/connect/dee1d3ef-434c-45a7-bf92-40702697030b/BrazilAugust2008.pdf?MOD=AJPERES>

⁶ See <https://www.fsis.usda.gov/wps/wcm/connect/bee4f47a-b2c8-4657-809b-54364204485b/Brazil2010.pdf?MOD=AJPERES>, p. 15

⁷ See <http://en.mercopress.com/2012/12/11/atypical-bse-case-detected-among-grass-fed-cattle-in-south-brazil>

FSIS found deficiencies in the Brazil's removal of specified risk materials associated with BSE in its inspection procedures for beef cattle.⁸

According to the last audit report posted by FSIS in 2015, Brazil had still not implemented a recognized laboratory testing program for Shiga toxin-producing E. coli (STEC) at its government laboratories.⁹ The first shipment of fresh beef from Brazil arrived in October 2016,¹⁰ but there has been no new audit report to confirm that a bona fide STEC testing program is in place in Brazil.

We are deeply concerned about the shoddiness of the Brazilian meat inspection system, not to mention the corruption that has permeated it. It is laughable that the United States continues to recognize their inspection system as being equivalent. As you know, JBS is the world's largest protein processor, operating plants in its native Brazil, the United States, Canada, Mexico, and Australia, most of which sell their products to U.S. consumers. A culture of corruption seems to have gripped that company. I would strongly urge that USDA summon the company's officials to a meeting to admonish them about what has transpired in Brazil and to put them on notice that if any of their company employees even think about trying to do here what just transpired in Brazil, the company would suffer dire consequences.

I look forward to your reply.

Sincerely,



Wenonah Hauter
Executive Director

Cc: Senator Pat Roberts
Senator Debbie Stabenow
Senator David Perdue
Senator Kirsten Gillibrand
Senator Thad Cochran
Senator Patrick Leahy
Senator John Hoeven

⁸ See https://www.fsis.usda.gov/wps/wcm/connect/3ec96b2d-57a1-4688-981c-19f698fcdd99/Brazil_2014_FAR.pdf?MOD=AJPERES, p. 10.

⁹ See <https://www.fsis.usda.gov/wps/wcm/connect/d0c646c1-cc80-4540-b3df-01da1d9e9040/Brazil-2015-FAR.pdf?MOD=AJPERES>, p. 15.

¹⁰ See <http://www.philly.com/philly/business/transportation/Philadelphia-port-gets-first-fresh-beef-from-Brazil-since-a-ban-between-nations-was-dropped-.html>

Senator Jeff Merkley
Senator Michael Conaway
Representative Collin Peterson
Representative David Rouzer
Representative Jim Costa
Representative Rodney Frelinghuysen
Representative Nita Lowey
Representative Robert Aderholt
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