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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

ARGENTINA

FROM 03 TO 15 SEPTEMBER 2014

IN ORDER TO EVALUATE THE OPERATION OF CONTROLS OVER THE PRODUCTION OF AND CERTIFICATION PROCEDURES FOR FRESH BOVINE MEAT DESTINED FOR EXPORT TO THE EUROPEAN UNION

Executive Summary

The report describes the outcome of an audit carried out by the Food and Veterinary Office (FVO) in Argentina from 3 to 15 September 2014. The objectives of the audit were to evaluate the operation of controls over the production of fresh meat for human consumption destined for export to the European Union (EU), as well as certification procedures and also to follow-up the recommendations of report DG(SANCO)2012-6347). This audit was carried out at the same time as the FVO audit on fresh equine meat and casings (DG(SANCO)2014-7296).

The total amount of beef exported from Argentina to the EU exceeded 34 000 tonnes in both 2012 and 2013.

The official control system in Argentina provides satisfactory assurances regarding compliance with EU requirements and includes a robust "on the spot" verification/inspection component. Further strengthening could be achieved by addressing the following:

- *the limited audit component of the food business operators' (FBOs) own controls,*
- *the lack of a flow of information of the official control results from regional to central levels which limits the analysis of information.*

EU listing procedures are generally satisfactory. Nevertheless, notification delays to the Commission Services resulted in establishments which were suspended remaining on the list for export to the EU for long periods of time.

The system of official controls at holding level is capable of ensuring that the EU requirements are met. The comprehensive system for registration of holdings and cattle identification in place in Argentina provides sufficient guarantees for EU cattle residence requirements. Nevertheless, the robustness of the system is undermined by the fact that the information recorded is not up to date as numerous identities related to dead cattle are registered as active.

Contrary to EU requirements the ante-mortem inspection was not always performed by an official veterinarian and slaughterhouse staff were regularly used for the performance of post-mortem inspection.

Notwithstanding some deficiencies related to microbiological testing of carcasses and labelling, which had not been identified by official controls, the control system over the compliance of the general and specific hygiene requirements, Hazard Analysis of Critical Control Points, maturation of beef, beef traceability and identification mark are generally capable of providing the guarantees required by the public health attestation of the model certificate.

Operational hygiene regarding cattle slaughter and dressing was found to be of excellent quality.

The FBOs and the Competent Authority (CA) have made progress on implementing the new animal welfare requirements contained in Regulation (EC) No 1099/2009.

The certification procedures were satisfactory and provide equivalent guarantees to those laid down in Council Directive 96/93/EC. Nevertheless, the certification procedures in place did not ensure that consignments were always certified before they left the control of the CA.

The procedures available have ensured that the CA and the FBO have dealt adequately with the Rapid Alert System for Food and Feed notifications evaluated during the audit.

A number of recommendations have been made to the CA with a view to enhancing the control system in place.

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Abbreviations and definitions used in this report

Abbreviation	Explanation
AV(s)	Accredited Veterinarian(s)
AWO(s)	Animal Welfare Officer(s)
CA(s)	Competent Authority(ies)
CCA(s)	Central Competent Authority(ies)
CCP(s)	Critical Control Point(s)
DG(AGRI)	Agriculture and Rural Development Directorate-General
DG(SANCO)	Health & Consumers Directorate-General
DIPOA	Health Directorate of Products of Animal Origin (*Dirección de Inocuidad Productos de Origen Animal)*
DTe	Animal Electronic Transit Document (*Documento para el Tránsito Electrónico de Animales*)
EC	European Community(ies)
EU	European Union
FBO(s)	Food Business Operator(s)
FMD	Foot and Mouth Disease
FVO	Food and Veterinary Office
HACCP	Hazard Analysis of Critical Control Points
Hygiene Package	Regulations (EC) No 852/2004, No 853/2004 and No 854/2004
OIE	World Organisation of Animal Health
OV(s)	Official Veterinarian(s)
RASFF	Rapid Alert System for Food and Feed
RENSPA	National Sanitary Register for Agriculture and Livestock Producers *(Registro Nacional Sanitario de Productores Agropecuarios)*
SAGPyA	Department of Agriculture, Livestock, Fisheries and Food - (*Secretaría de Agricultura, Ganadería, Pesca y Alimentos)*

SENASA	National Service for Agriculture and Food Quality *(Servicio Nacional de Sanidad Y Calidad Agroalimentaria)*
SIGSA	Integrated management system for animal health *(Sistema Integrado de Gestión Animal–SIGSA)*
TRI	Lot Register Card (*Tarjeta Individual de Registro de Tropa)*

1 Introduction

The audit took place in Argentina from 3 to 15 September 2014 as part of the planned audit programme of the Food and Veterinary Office (FVO). The audit team comprised two auditors from the FVO and one auditor from the Agriculture and Rural Development Directorate-General (DG(AGRI)). This audit was carried out at the same time as the FVO audit on fresh equine meat and casings (DG(SANCO)2014-7296).

The FVO audit team was accompanied by representatives from the Central Competent Authority (CCA), the National Service for Agriculture and Food Quality *(Servicio Nacional de Sanidad Y Calidad Agroalimentaria* - SENASA) from the Argentinian Department of Agriculture, Livestock, Fisheries and Food - *Secretaría de Agricultura, Ganadería, Pesca y Alimentos*, (SAGPyA).

The opening meeting was held on 3 September 2014 with the CCA in Buenos Aires. At this meeting the FVO audit team confirmed the objectives of, and itinerary for the audit, and additional information required for the satisfactory completion of the audit was requested.

2 Objectives

The objectives of the audit were to evaluate the operation of the official controls over the production of bovine meat destined for export to the European Union (EU), as well as certification procedures with regard to:

- Competent Authority (CA) organisation and operation,
- official controls over food business operators' (FBO) compliance with general and specific rules on the hygiene of food of animal origin,
- the correct implementation of the chain of certification, and
- the follow-up actions taken by the CA in response to recommendations relevant to the scope of this audit and of report DG(SANCO)2012-6347 (hereafter referred as as audit report 2012-6347).

In particular, controls over fresh bovine meat in the framework of Regulations (EC) No 178/2002, No 852/2004, No 853/2004, No 854/2004 and No 206/2010 were subject to this evaluation. In pursuit of these objectives, the audit itinerary included the following:

COMPETENT AUTHORITIES			Comments
Competent Authorities	Central	1	Opening and closing meetings at the SENASA Headquarters. Visit to the central office responsible for certification. Representatives from the relevant Regional and Local CAs were met in the establishments holdings and in the local offices visited
	Regional	2	
	Local	6	
FOOD PRODUCTION / PROCESSING / DISTRIBUTION – ACTIVITIES			
Slaughterhouses		3	
Cutting premises		3	Attached to the slaughterhouses visited
Cold stores		3	Attached to the slaughterhouses visited

COMPETENT AUTHORITIES		Comments
Cattle holdings	3	

3 Legal Basis

The audit was carried out under the general provisions of EU legislation and, in particular Article 46 of Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

N.B. Full legal references are provided in Annex 1. Legal acts quoted in this report refer, where applicable, to the latest amended version.

4 Background

Total cattle population: approximately 51 000 000 according to the CA database. Eurostat data shows that Argentina exported over 34 000 tonnes of fresh beef in both 2012 and 2013.

EU Member States are authorised to import bovine meat from the Argentinian territory if the requirements of Model "BOV" certificate of part 2 of Annex II to Regulation (EU) No 206/2010 are satisfied. The country is divided into four territories from which imports can take place, two where foot and mouth disease (FMD) vaccination is practised and two where it is not practised. There is a specified buffer area of 25 Km from the border with Bolivia and Paraguay from which exports to the EU of bovine meat are not authorised.

Argentina is a member of the World Organisation of Animal Health (OIE) and is recognised by the OIE as free of FMD. The OIE divides the country into two zones where FMD vaccination is practised and one where vaccination is not practised.

The previous audit concerning the safety of fresh bovine meat in Argentina was carried out from 30 May to 11 June 2012, the results of which are described in audit report 2012-6347. The action plan and the additional information received from the Argentinian authorities in response to the recommendations of audit report 2012-6347 provided satisfactory guarantees to all the report's recommendations.

Audit report DG(SANCO)2012-6399 regarding animal health controls concerning FMD and certification of fresh bovine meat contains relevant aspects related to the scope of this audit.

All of the above audit reports are accessible on the internet website at:

http://ec.europa.eu/food/fvo/ir_search_en.cfm

5 Findings And Conclusions

5.1 Legislation and Competent Authorities

5.1.1 Legal basis

Article 46.1 of Regulation (EC) No 882/2004 stipulates that official controls by Commission experts in third countries shall verify compliance or equivalence of third country legislation and systems with EU feed and food law, and EU animal health legislation. These controls shall have particular regard to points (a) to (e) and (g) of the aforementioned Article.

5.1.2 Findings

5.1.2.1 Legislation

The Argentinian provisions remain mainly unchanged since the last FVO audit. New provisions introduced are described under the appropriate headings of this audit report.

5.1.2.2 Competent Authorities

5.1.2.2.1 Organisation of Competent Authorities

The SENASA structure is comprised of a central office (*Casa Central*) which is responsible for various tasks such as drafting national provisions and procedures for delivery of official controls and management of the official control and training programmes. At central level the Health Directorate of Products of Animal Origin (*Dirección de Inocuidad Productos de Origen Animal*-DIPOA) is responsible for most of the areas included in the scope of this audit while the Central Directorate of Management and Special Programmes (*Dirección Central de Gestión y Programas Especiales*) of the Directorate General of Animal Health is responsible for the integrated management system for animal health *(Sistema Integrado de Gestión Animal–SIGSA)* which is the key tool used for the certification of the EU residence requirements.

The SENASA structure also includes 14 regional offices and 367 local offices. The regional offices are responsible for the implementation of the official controls on the EU listed establishments and holdings included in the EU circuit. At each region, thematic co-ordinators for public and animal health are appointed to oversee the official controls. Designated public health supervisors perform monthly inspections of the EU listed establishments.

In addition, in each EU approved slaughterhouse there is a head official veterinarian (OV) in charge of the inspection service. The head OV reports to the public health regional level. The inspection service at slaughterhouse level also comprises OVs and auxiliaries. The auxiliaries can be employed by SENASA or by the FBO.

The local office OVs are responsible for the official controls at holdings listed in the EU circuit. The local OVs report to an animal health regional supervisor.

The FVO audit team noted the following:

- Besides the results of ante- and post-mortem inspection the information related to the supervision of official controls performed at regional level is not systematically collated and

forwarded to the central level. Therefore the results of these controls cannot be analysed in order to verify the effectiveness of the official control system.

- In the three slaughterhouses visited the CA routinely used slaughterhouse personnel as auxiliaries for the performance of post-mortem inspection. The FBO directly employed 62 out of 320 auxiliaries performing official control tasks in approved EU establishments. This is contrary to Chapter III of Section III of Annex I to Regulation (EC) No 854/2004 which only allows the involvement of slaughterhouse staff in the post-mortem inspection of poultry and lagomorphs.

5.1.2.2.2 Competent Authorities powers, independence and authority for enforcement

In the establishments and holdings visited the FVO audit team observed that the CA had sufficient enforcement powers, independence and authority to carry out the official controls necessary for the certification of fresh bovine meat to be exported to the EU.

5.1.2.2.3 Supervision

According to Circular No 4056/A, the regional supervisor must perform monthly supervision official controls. Point 15 of the regional supervisory control procedures includes the evaluation of the inspection service activities. These supervision activities include also the inspection of the establishments.

The re-evaluation of the EU listed establishments must be done at least once every two years in accordance with the procedures of Circular 4014 B. The re-evaluation includes some aspects of the inspection service performance.

The local offices must be supervised at least once a year in accordance with procedures issued at central level that include the evaluation of the local OV performance.

The FVO audit team noted the following:

- The supervision of the activities of the OV at the establishment and local offices visited, where this aspect was evaluated, were carried out at the required frequencies in accordance with the procedures in place and included follow-up actions. In the local offices visited yearly supervisory reports were available.

5.1.2.2.4 Training of staff in performance of official controls

In response to recommendation No 1 of audit report 2012-6347 *"To improve the official control system to guarantee that the products of animal origin exported to the EU are only dispatched from, and obtained or prepared in, establishments that meet the relevant EU requirements, as laid down in Article 12(2)(a) of Regulation (EC) No 854/2004",* the CA provided evidence that training on the new documented procedures introduced in order to address this recommendation had been provided to the OVs in charge of performing the re-evaluation of the EU listed establishments.

The FVO audit team noted the following:

- The officials interviewed during the audit had generally adequate knowledge of the EU requirements and the CCA provided a variety of on-line training courses.

- The training of official auxiliaries is done at the discretion of the head OV based on his judgement and not in a centralised training procedural strategy. In one slaughterhouse the OV provided the auxiliaries with 45 minute training in post-mortem inspection. The FVO audit team noted that one of the auxiliaries, recently trained and employed by the FBO, did not perform the post-mortem inspection in line with the EU requirements.

5.1.2.2.5 Organisation of control systems

The organisation of control systems in Argentina remains mainly as described in previous FVO reports.

The FVO audit team noted that the Argentinian official control system at EU listed establishments includes a strong verification component. The officials perform a great number of daily "on the spot" verifications/inspections of FBO's obligations such as hygiene requirements and animal welfare and take numerous official samples. These controls are implemented with the daily deployment of officials at the different areas of the slaughterhouses. Nevertheless, the system includes a limited audit component of the FBO's own control procedures. This limited audit activity does not ensure that certain aspects of the EU requirements such as availability of all necessary documented procedures, compliance with some aspects of the carcass sampling requirements and adequacy of the Hazard Analysis of Critical Control Points (HACCP) based procedures are fully evaluated by the CA.

5.1.2.2.6 Documented control procedures

The CA has introduced documented control procedures that are detailed under the different headings of this audit report.

In response to recommendation No 1 of audit report 2012-6347 the CA introduced Circular No 4014 B which establishes the procedures for the initial and subsequent evaluations of the EU listed establishments.

The FVO audit team noted that, at the establishments and local offices visited, the official controls were documented in line with the Argentinian procedures. However, in the regions visited, there was a different degree of documentation of the follow up controls performed by the CA in order to verify the corrective actions initiated by the FBO after the identification of shortcomings during the official controls.

5.1.2.2.7 Official controls on imports

The FVO audit team noted that in the establishments visited the FBOs did not handle imported meat.

Conclusions on Competent Authorities

Contrary to the EU requirements slaughterhouse personnel are regularly used for the performance of post-mortem inspection. The lack of harmonised and appropriate training of the official auxiliaries did not ensure that the post-mortem inspection was always carried out in line with EU requirements.

In other regards, the control system in Argentina provides satisfactory assurances regarding

compliance with the EU requirements as required by Article 46.1(h) of Regulation (EC) No 882/2004. The control system includes a robust "on the spot" verification/inspection component which largely ensures the FBOs' compliance with EU requirements.

Further strengthening of the official control system could be achieved by addressing the following:

- The limited audit component of the FBO own controls which does not ensure a full evaluation of compliance with EU requirements.
- The lack of flow of information of the official control results from the regional level to the central level which does not allow the analysis of this information.
- The lack of a uniform procedure for the documentation of the follow-up of actions taken by FBOs in order to address shortcomings identified by official controls.

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5.2 Holding registration, Animal identification

5.2.1 Legal Requirements

The veterinary certification requirements for the introduction into the EU of fresh meat are laid down in Regulation (EU) No 206/2010. The Regulation, sets out the animal health requirements to be met, including for bovine animals the requirement for the CA to have system(s) in place for holding registration and animal identification.

5.2.2 Findings

All bovine holdings must be registered in the National Sanitary Register for Producers (*Registro Nacional Sanitario de Productores Agropecuarios* - RENSPA). Different producers carrying out activities in the same holding must also be registered in the RENSPA as independent production units. In addition, all production units supplying bovines for slaughter for export to the EU must be registered under one of two categories: Field EU Slaughter (C*ampo de Faena UE*) and EU Feedlot (*engorde a corral UE*). These production units must only source bovines from production units registered in the Special Register of Holdings of Origin or registered as field EU slaughter. All these registration requirements establish the basis of the EU closed commercial circuit.

All bovines in Argentina must be individually identified and registered at weaning or when the first movement takes place (whichever event takes place first). The individual identification in Argentina consists of one large and one small ear-tag.

The SIGSA is the IT application that feeds the database containing the information regarding holding registrations, individual cattle identification and registration and movements.

In Argentina all cattle are hot branded. Hot branding establishes the legal ownership of the animals.

All holdings/production units approved to supply cattle for EU productions must keep records including a cattle movement log book. All cattle movements must be accompanied by an Individual Lot Register Card (*Tarjeta Individual de Registro de Tropa–TRI*) where all the individual identities of the bovines subject to the movement are listed. When the movement is for slaughter for the EU

the TRI must be accompanied by a sanitary certificate issued by an Accredited Veterinarian (AV). In order to issue the certificate, the AV must verify that the cattle are healthy, properly identified and fulfil the EU requirements of 40 days permanence in the holding and 90 days in an authorised area. In addition, all cattle movements must take place with an Animal Electronic Transit Document (*Documento para el Tránsito Electrónico de Animales–DTe*) issued by the SENASA local office. All these documents are linked and issued by the SIGSA and verified by the SENASA.

All cattle movements must be confirmed in the system with the notification by the receiving holding representative that the movement has taken place and that the cattle identities received correspond to the TRI. In the slaughterhouses, the FBO must verify all the individual cattle identities while the OV must verify 10% against the TRI. The movements of cattle to the slaughterhouse must be confirmed by the FBO and the identities of the cattle removed from the database. There are provisions in place for individual cattle and lot exclusions from EU production due to missing or incorrect identification.

The local OV must perform annually official controls of at least 5% of the EU approved holdings in accordance with instruction No 24-08. These controls include documentary controls of the cattle movements and the AV certification requirements for the EU, control of the use of veterinary medicines, control of the ear-tags in stock and verification of the individual identification of at least 60 animals and cross-check with the SIGSA database.

The FVO audit team noted the following:

- At the time of the AV certification the SIGSA database highlights the bovines that do not fulfil the residence requirements and the system does not allow the issuing of the DTe. In addition, the system does not allow the movement of non-EU eligible cattle to holdings approved to supply cattle to the EU.

- The database registers the date of identification and not the date of birth of the animal.

- In the three holdings visited the cattle movement logbooks were kept up to date and were an accurate record of the cattle movements and cattle present. In addition, the SENASA local offices had an up to date picture of the cattle numbers present in the holdings. The data is kept in the stock register database of SIGSA.

- The SIGSA database contains as “active” the identities of dead cattle which are not systematically removed from the system. Furthermore, the CA stated that until 2011 the individual identities of the cattle sent for slaughter were not removed from the database and still remain. The following table illustrates the above facts:

Type of EU approved holding	Number of registered holdings	Number of cattle in the stock register database	Number of active cattle identities in the database
Field EU	20 551	10 053 000	19 456 000
EU feedlot	163	99 022	207 216
Holding of origin	4 635	11 979 000	15 450 000

The SIGSA allows the certification for EU slaughter of all active cattle identities and therefore the issuing of replacement tags linked to active individual identities which due to the large number of active cattle already dead, increases the likelihood of fraudulent use. No evidence of such fraudulent activities was noted during this FVO audit. The CA stated that they were aware of this problem and they were working towards resolving it.

- 100% and 10% of the cattle identities were verified by the FBO and the CA respectively against the TRIs at slaughterhouses visited.

- The FVO audit team verified the identities of over 100 cattle in the three holdings visited. All cattle bear their individual identification and all identities were registered in the SIGSA database at the appropriate RENSPA.

- During 2013 the CA carried out official controls in 6% of the EU approved holdings applying 31 prohibitions.

- In one local office 2 out of 24 AVs registered to perform the activity, had been evaluated last year according to the procedures in place. The OV stated that only 10 out of the 24 AVs were actively involved in certification to the EU. The procedure in place does not include a minimum frequency of verification of the activities of the AV. Nevertheless, examples of AV targeted supervision resulting from the analysis of the AV EU certification activities at SIGSA level, were available. These verification activities may result in the suspension of an AV.

Conclusions

The comprehensive system in place in Argentina for holding registration and cattle identification provides sufficient guarantees to support the statements of Point 11.2 of the model certificate in Part 2 of Annex II to Regulation (EU) No 206/2010. Nevertheless, the robustness of the system is partially undermined by the fact that the information recorded is not up to date as numerous identities related to dead cattle are registered as active. The system of official controls at holding level is capable of ensuring that the EU requirements are met. The supervision system of AV EU certification activities is adequate.

The introduction of a minimum frequency of verification of the AV EU certification activities will further strengthen this system.

5.3 Listing of establishments

5.3.1 Legal requirements

Article 12 of Regulation (EC) No 854/2004 requires that products of animal origin may be imported into the EU only if they have been dispatched from, and obtained or prepared in, establishments that appear on lists drawn up, kept up-to-date and communicated to the Commission.

5.3.2 Findings

In response to recommendation No 2 of audit report 2012-6347 *"To review all EU listed establishments in the fresh meat sector in light of the outcome of this audit and to ensure that currently listed establishments meet all the relevant EU requirements, as laid down in Article 12(2)*

(a) of Regulation (EC) No 854/2004" the CA committed themselves to re-evaluate by the end of 2013 all the EU listed establishments using the procedures detailed in Circular 4104 B.

To avoid conflicts of interest the OVs performing the listing and re-evaluation of the establishments in one region are selected from the other regions and/or central level.

When suspension of the EU establishment takes place, the FBO has a 60 day time frame to rectify the shortcomings that lead to the suspension before the CA issue a request to the Commission to de-list the establishment for EU exports.

The FVO audit team noted the following:

- In one of the three establishments where the re-evaluation had recently taken place the FVO audit team identified structural shortcomings not identified in the re-evaluation report.

- At the time of the audit the SENASA had re-evaluated 83 EU approved establishments while 16 remained to be re-evaluated despite the CA commitment to perform the re-evaluation by 2013. Two of the three establishments visited which were due a re-evaluation visit were not scheduled for such a visit. The CA stated that this was due to a lack of staff.

- The CA had notified the Commission only in July 2014 of the de-listing of one establishment which ceased operations in December 2013.

Conclusions

The procedure for listing and re-evaluating establishments for export to the EU is satisfactory. Nevertheless, recommendation No 2 of audit report 2012-6347 is not fully addressed as the re-evaluation schedule has not been met.

Delays in notifying the Commission resulted in suspended establishments remaining listed for export to the EU for long periods of time.

5.4 Official controls at establishment level

5.4.1 Legal requirements

Article 12 of Regulation (EC) No 854/2004 lays down that the CA of a third country of origin has to guarantee that establishments placed on the list of establishments from which imports of specified products of animal origin to the EU are permitted, together with any establishments handling raw material of animal origin used in the manufacture of the products of animal origin concerned, complies with relevant EU requirements, in particular those of Regulation (EC) No 853/2004, or with requirements that were determined to be equivalent. It also lays down that an official inspection service supervises the establishments and has real powers to stop the establishments from exporting to the EU in the event that the establishments fail to meet the relevant requirements.

The animal and public health and veterinary certification requirements for the introduction into the EU of products of animal origin intended for human consumption are laid down in the product specific Commission Regulations covered by the scope of the audit, i.e. Regulations (EC) No 119/2009 and No 206/2010.

5.4.2 Findings

5.4.2.1 Ante-mortem inspection

According to the procedures in place all animals being held in the lairage must be re-inspected every working day. Lots sent to slaughter (*tropas*) must be provided with an official ante-mortem inspection card that is tagged to the first animal being sent for slaughter from that group.

The FVO audit team noted the following:

- Results of ante-mortem inspection were well documented with inspection of CA personnel upon arrival of animals during working hours, and in the majority of cases the presence of official auxiliaries outside working hours acting as "spotters" of any issues for communication to OV and, if necessary, requesting his urgent presence.

- In one establishment visited the animals were inspected and cleared for slaughter either by the OV or the official auxiliary, whilst at the other two establishments visited, final inspection prior to slaughter was done exclusively by the OV.

5.4.2.2 Post-mortem inspection

A working system of post-mortem inspection was noted with sufficient personnel and facilities provided for its performance. The majority of staff showed a good level of performance and understanding on the delivery of such official controls. However, in one specific instance it was noted that the official auxiliary carrying out post-mortem inspection of the head was only doing one incision of external masseters and none of the internal ones nor the parotid lymph-nodes as required.

The post-mortem inspection system included a final control step where an OV re-inspects any carcasses that have been diverted by the official auxiliary due to significant non conformities noted for his final assessment and decision.

A manual recording system of partial and total rejections together with the reason for them was used. Such information was amalgamated into a monthly record which was sent to central office. However, a new computerised system has already been implemented at some slaughterhouses and will ultimately be rolled out to all. This system enables the recording of ante- and post-mortem findings specific for each lot *(tropa)* into the database.

5.4.2.3 General and specific hygiene

The majority of establishments visited were found to be satisfactory, with some issues requiring further attention due to the age of the buildings and facilities at all establishments. This was more acute at one of the establishments visited. The problems identified ranged from minor (e.g. broken tiles, cracks on floors, corrosion in overhead rails and structures in processing areas), to more serious (e.g. contact between structures and product during dressing process and de-boning facilities that had been outgrown by the throughput of the establishment).

The official controls were found to be detailed and based on procedures that included several daily checks at different parts of the establishment. Whilst the majority of findings made by the FVO audit team had already been highlighted by the CA and included within enforcement and

maintenance programmes, some had not been noted by the CA or not attributed the necessary importance. This was specially so at one of the establishments visited.

Operational hygiene was found to be generally of excellent quality. Great care is given to the processing of carcasses to minimise as much as possible the possibility of contamination either from the de-hiding process or from gastrointestinal content. Prophylactic measures such as animals being washed three times prior to slaughter with hyper-chlorinated water were also in place to reduce the likelihood of contamination. Other measures included double ligature of the oesophagus (rodding); the de-hiding step being subdivided into two distinctive steps designed to reduce the possibility of contamination and formation of aerosols, implementation of a steam and suction point on the line addressing those areas of the carcass where contamination was more likely to occur just after slaughter and before final carcass wash and final carcass wash with potable water. In addition, lactic acid was used to reduce microbiological carcase load, specially *E. coli 0157:H7* in two of the three establishments visited. One noted shortcoming was the use of high pressure washers at final carcass wash in one establishment which could lead to cross contamination. This issue was immediately addressed by both the FBO and the CA.

5.4.2.4 HACCP-based systems

HACCP based procedures were in place at all the establishments visited. The Critical Control Points (CCPs) identified included in the slaughterhouse: carcass free of contamination; surface carcass temperature at end of chilling and carcass wash with lactic acid at those establishments where this step was used. The CCP at the boning hall was defined as trim temperatures.

FBO procedures were well documented and verification records were available together with corrective action in case of deviation.

Official controls also included a daily verification of at least one of the FBOs' CCPs, deficiencies were noted, corrective actions requested, taken and recorded.

The FVO audit team noted that the CA must carry out official controls of the FBO's HACCP plan. Nevertheless these controls only included a limited level of verification without a proper evaluation of the suitability of such a plan.

5.4.2.5 Microbiological testing

In response to recommendation No 3 of audit report 2012 *"To ensure that microbiological testing of carcasses is performed in line with the requirements of Regulation (EC) No 2073/2005"* the CA introduced Circular 4046. This Circular provides for compulsory implementation of Regulation (EC) No 2073/2005 provisions.

The FVO audit team noted the following:

- Microbiological sampling took place at all establishments visited, and, in the majority of cases, the number of samples, frequency and method of analysis were in line with EU requirements. However at one of the establishments visited the FBO could not prove that the method of analysis for aerobic colony count was the reference method or another one validated against the reference method. Furthermore, at this specific establishment, *Salmonella* sampling consisted of one composite sample of three carcasses which is not in line with the requirements.

- All microbiological results seen showed results within the required limits and were in line with the high standard of carcass dressing seen by the FVO audit team.

- CA official controls included in all cases scheduled microbiological sampling which was sent to an official laboratory as a way to verify FBO own controls. However, evidence was seen that there was no routine verification of FBO own controls as this verification was not included in the official control procedures. As a consequence, none of the shortcomings noted by the FVO audit team on the FBO own controls had been identified by the CA.

In response to recommendation No 4 *"To ensure that water testing is performed in line with the requirements of Council Directive 98/83/EC"* the CA reviewed the parameters and frequency of water testing which are specified in Circular No 2731 A. This Circular introduces the requirement to perform official samples fortnightly for the testing of the microbiological parameters listed in Council Directive 98/83/EC. The frequency of sampling for the physical-chemical parameters is established every six months and when the results are satisfactory the frequency may be reduced to one sample annually.

The FVO audit team noted that in the establishments visited the CA had procedures in place to test water for microbiological and physical-chemical parameters in accordance with the Circular. However, not all the chemical parameters listed in this Directive were monitored (e.g. Selenium, Vinyl chloride, Antimony and Boron). The CA stated that they are in the process of upgrading their laboratory capacity in order to test for all the required parameters.

5.4.2.6 Separation of EU/non EU eligible animals and products

In all establishments visited procedures were in place to ensure separation of EU and non-EU eligible animals and products.

The slaughter of EU and non-EU animals was separated in time. Separation of EU productions and stored meat was adequate in the establishments visited.

5.4.2.7 FMD controls

In all slaughterhouses visited, appropriate FBO and CA procedures were in place for the control on the duration and temperature of the maturation, and on the pH controls of the meat at the end of the process. The feet and muzzle of slaughtered cattle were also inspected for the presence of vesicular diseases.

5.4.2.8 Traceability and identification marking

The CA perform regular traceability exercises as part of their official controls.

Live cattle were grouped in lots (*tropa*s). The lot traceability was kept throughout the slaughter and cutting operations. At slaughter individual kill numbers were given to the carcasses. These kill numbers were not linked to the individual identification numbers. The establishments must keep traceability records of the slaughtered lots of cattle and the productions derived from the lots in standard documents in accordance with Circular 3510. These records must be presented to the CA and can be used to verify the traceability of the EU eligible certified fresh meat.

The labels applied to the final product must be approved at central level.

The FVO audit team noted the following:

- The supporting traceability documentation available in the establishments visited was satisfactory. The documentation systems could be strengthened with the introduction of supporting documents on the destination of the carcasses that were excluded from EU productions for reasons such as pH non-compliances. This documentation was not readily available to the certifying officers. Successful traceability exercises were performed by the FVO audit team in all establishments visited.

- In the establishments visited health marking was correctly applied to EU eligible carcasses. Box seals bearing the identity mark of the establishment were applied to EU productions. These seals were stored by the CA and records of its usage were kept.

- In two establishments visited the fresh meat labelling was satisfactory. However, in one establishment the labels applied to fresh meat intended to be exported to the EU were not in compliance with point 5 of Article 13 of Regulation (EC) No 1760/2000 as the country of birth and the country of fattening were not indicated.

5.4.2.9 Animal welfare at the time of slaughter or killing

An FBO system for control of animal welfare at the time of killing and its regular monitoring was in place in all establishments. The handling and restraining facilities were found to be well designed, built and able to cope with the speed of the processing without creating any unnecessary stress to the animals. Staff dealing with live animals showed the necessary knowledge on the movement of animals and the appropriate attitude. The electric prod, although available, was not seen in use.

The percussion method was used for the stunning of the animals with back-up systems available and adjacent in case the main equipment failed. Time between stunning and sticking was found to be in all cases around one minute.

Animal Welfare Officers (AWOs) were available and dealing with animal welfare at the establishments visited, although such officers had existed for a longer time, they had only recently received official training and certification from the SENASA. In two of the establishments visited there was only one AWO available, training had already started for future AWOs.

Regarding slaughterhouse personnel dealing with live animals these had been internally trained for the specific duties that they performed, however they did not hold certificates of competence in line with Article 21of Regulation (EC) No 1099/2009. The CA stated that they intended to establish a system for issuing certificates of competence in the near future.

Documented procedures were available covering the majority of welfare requirements, however there were processes that the FBO had failed to include in it, such as religious slaughter (Kosher) of animals used for EU production. In another instance procedures fell short of legal requirements such as the provision of feed and bedding 24 hours after arriving at the establishments instead of the statutory required 12 hours. Evidence was seen that such feed and bedding provisions were provided by the same FBO in two other slaughterhouses.

At another establishment whilst appropriate monitoring, verification and corrective action for animal welfare was taking place none of the parameters to be measured, with limits and action to be taken, was part of the documented procedures.

The CA had failed to notice such shortcomings and there was limited evidence of CA verification of FBO documented procedures, nevertheless the CA verification of the implementation of animal welfare procedures by FBOs was routinely being carried out and a check-list was used as per the required procedure.

5.4.2.10 Documentation of official controls

Official controls were amply documented with several check-lists being used on a routine basis. These ranged from the daily checks carried out by the official auxiliaries to the monthly audit report of the establishment done by the veterinary supervisor of the region.

Conclusions

Whilst there is a system for the assessment and inspection of animals upon arrival at the processing establishment by CA personnel, it does not ensure that in all instances an ante-mortem inspection is carried by an OV. There was a sufficient number of personnel to carry out post-mortem inspection and, in the majority of cases, this was done as required, nevertheless shortcomings were noted in at least one establishment where head inspection was not appropriately done. Satisfactory FMD controls were performed with systematic maturation verification checks.

Official controls largely ensured that the general and specific requirements were met. Operational hygiene was found to be of excellent quality at all establishments.

HACCP based procedures were appropriately implemented by FBOs and also in the majority of cases for microbiological criteria. However, microbiological shortcomings at one establishment were not identified by the CA as verification of FBO own procedures was not required as part of the routine official controls. Recommendation No 3 of audit report 2012-6347 has been largely addressed.

The FBOs and the CA have made progress on implementing the new animal welfare requirements contained in Regulation (EC) No 1099/2009. Appropriate attention was paid to animal welfare in FBO procedures including systematic monitoring and regular verification. The CA procedures also included regular verification of the implementation of animal welfare. However, CA verification of FBO own procedures was not required as part of the routine official controls.

The CA has made significant progress but is still in the process of addressing recommendation No 4 of audit report 2012-6347 and are currently introducing testing for all the chemical parameter requirements of Council Directive 98/83/EC. Therefore, recommendation No 4 of audit report 2012-6347 has not yet been fully addressed.

Traceability, labelling and ID mark were found to be generally satisfactory and appropriately verified by the CA. However, issues were identified regarding labelling in one establishment visited.

5.5 Official certification

5.5.1 Legal requirements

Council Directive 96/93/EC states that during inspections or audits the Commission shall ensure that the rules and principles applied by the third country certifying officers offer guarantees at least

equivalent to those laid down in this Directive.

The specific animal health, public health and veterinary certification requirements for the introduction into the EU of products of animal origin intended for human consumption, are laid down in the product specific Commission Regulations.

5.5.2 Findings

The certificates for export are issued by the SENASA at any of the 30 certification offices distributed around the country, based on pre-certificates issued at the establishments of origin (*Certificado Sanitario de Exportación Provisorio-CSEP* and health attestation in the form of an Annex). The FVO audit team visited one certification office which certified approximately 90% of the products of animal origin exported to the EU.

The CA procedures for certification are detailed in the Manual of Certification (*Manual de procedimientos de certificación definitiva de exportación*).

In response to recommendation No 6 of audit report 2012-6347 *"To ensure that when certifying meat from bovine animals and from lagomorphs to be exported to the EU rules and principles of certification equivalent to those laid down in Council Directive 96/93/EC*" the CA commenced the digitalisation of the provisional health certificates to ensure that final certificates are issued only when the provisional certificates are posted in the certification IT application.

The FVO audit team noted that:

- The CA stated that they are carrying out a trial of the new full certification electronic system. At the time of the audit the certification of fresh meat was based on both paper and electronic pre-certificates. The CA stated that they are working to introduce fully electronic pre-certification.

- The loads reviewed at the certification office had travelled to Buenos Aires port where SENASA officials evaluated the documentation and verified that the container and container seal numbers matched the certificate number. The SENASA officials received the load and released it for loading to the ships.

- The CA stated that final certification took place mainly when the goods had passed from the control of the SENASA (when the ship was sailing). The CA informed the FVO audit team that this was due to the fact that the exporters did not provide, at a sufficiently early stage in the process, the details of the ship to be entered in box I.15 of Model BOV certificate.

- The certificates reviewed by the FVO audit team were issued based on pre-certificates which supported the points certified in the final certificate.

- In the three establishments visited the FVO audit team evaluated the supporting documentation available for a group of pre-certificates issued by the OVs finding it satisfactory. The documentation available demonstrated that all cattle slaughtered for EU production originated from EU approved holdings and were certified for the residence requirements by the AV.

- In the holdings visited the FVO audit team evaluated several sanitary certificates issued by

the AV found them to be satisfactory.

Conclusions

The certification procedures are satisfactory and provide equivalent guarantees to those laid down in Directive 96/93/EC. Nevertheless, the certification procedures in place did not ensure that consignments were always certified before they left the control of the CA which is contrary to point 6 of Annex VI of Regulation (EC) No 854/2004. While this does not fundamentally undermine the validity of the certification, recommendation No 6 of audit report 2012-6347 cannot be considered as having been fully addressed.

5.6 FOLLOW UP OF RASFF NOTIFICATIONS AND ALERTS

Note AUE DIPOA No 2 establishes the requirement to create *ad-hoc* investigation teams, to investigate the Rapid Alert for the Safety of Food and Feed (RASFF) notifications, which must visit the establishments involved, perform pre and operational verifications and ensure that specific measures are taken to address the notifications.

The FVO audit team evaluated on the spot the action taken by the CA and the FBO in the case of a RASFF notification regarding the presence of *Shigatoxin*-producing *E.coli* in beef. This RASFF led to the introduction of reinforced procedures at arrival into the EU which resulted in another fifteen RASFF rejection notifications and one alert notification. The notifications were dated from 15 March to 14 October 2013.

In the case evaluated the SENASA forwarded the notifications to the FBO and to the regional inspection service. After the first notification the regional supervisor evaluated the procedures in place on 8 April 2013 and made recommendations to improve the operational hygiene. On the 15 April 2013 the SENASA at central level carried out another evaluation that resulted in further recommendations. On 27 June 2013 the *ad-hoc* group carried a further evaluation making recommendations such as improving tail dressing and pre-operational hygiene.

The FVO audit team noted the following:

- The CA had documented evidence of the follow up process of these notifications and the actions taken to address the recommendations made by the CA. Nevertheless, the *ad-hoc* group only carried out the evaluation specified in Note AUE DIPOA No 2, 106 days after the first notification.

- The FBO under the supervision of the CA implemented the following measures:

    - Thorough review of the HACCP based procedures. This led to a change in the dressing procedures at different levels, increase the overall hygiene and retraining of staff.

    - Washing of live cattle before slaughter three times with hyper-chlorinated water (15 ppm). The CA has produced Note No 68329 that recommends washing cattle three times before slaughter with water chlorinated at least to 5 ppm.

    - The use of a steam application step to the hide of animals after bleeding in the areas where the incisions for dressing take place. Also a carcass steam application step was introduced after dressing and before high pressure water washing. The FBO performed a

validation exercise comparing the microbiological results prior to, and after, the steam application steps finding significant reductions in the microbiological loads.

- The application of lactic acid at 3-5% to carcasses before chilling.

- The FBO updated the meat testing programme in place including the testing for the presence of *Shigatoxin*-producing *E. coli*. The enhanced programme included testing carcasses and cuts originated from all the cattle lots slaughtered.

The FVO audit team noted that the implementation of these enhanced procedures was done to a high standard and the commitment of the FBO to this process was high.

The introduction of some of these steps was noted in another establishment visited not subject to RASFF notifications.

Conclusion

The FBO has made considerable efforts and introduced a range of new steps and enhanced operational hygiene procedures to deal with the RASFF notifications. The procedures available have ensured that the CA and the FBO have dealt adequately with the RASFF notifications evaluated during the audit. However, the RASFF *ad-hoc* group carried out a delayed follow-up of the RASFF notification reviewed.

6 Overall Conclusion

The official control system in Argentina provides satisfactory assurances regarding compliance with EU requirements and includes a robust "on the spot" verification/inspection component. Further strengthening could be achieved by addressing the following:

- the limited audit component of the FBOs' own controls;

- the lack of a flow of information of the official control results from regional to central levels which limits the analysis of information.

EU listing procedures are generally satisfactory. Nevertheless, notification delays to the Commission Services resulted in establishments which were suspended remaining on the list for export to the EU for long periods of time.

The system of official controls at holding level is capable of ensuring that the EU requirements are met. The comprehensive system for registration of holdings and cattle identification in place in Argentina provides sufficient guarantees for EU cattle residence requirements. Nevertheless, the robustness of the system is somewhat undermined by the fact that the information recorded is not up to date as numerous identities related to dead cattle are registered as active.

Contrary to EU requirements the ante-mortem inspection was not always performed by an official veterinarian and slaughterhouse staff were regularly used for the performance of post-mortem inspection.

Notwithstanding some deficiencies related to microbiological testing of carcass and labelling, which had not been identified by official controls, the control system over the compliance of the general

and specific hygiene requirements, HACCP, maturation of beef, beef traceability and identification mark are generally capable of providing the guarantees required by the public health attestation of the model certificate.

Operational hygiene regarding cattle slaughter and dressing was found to be of excellent quality.
The FBOs and the CA have made progress on implementing the new animal welfare requirements contained in Regulation (EC) No 1099/2009.

The certification procedures were satisfactory and provide equivalent guarantees to those laid down in Council Directive 96/93/EC. Nevertheless, the certification procedures in place did not ensure that consignments were always certified before they left the control of the CA.

The procedures available have ensured that the CA and the FBO have dealt adequately with the RASFF notifications evaluated during the audit.

The recommendations from audit report 2012-6347 had been largely addressed.

7 Closing Meeting

A closing meeting was held on 15 September 2014 with the CCA, the SENASA. At this meeting the audit team presented the findings and preliminary conclusions of the audit and advised the CCA of the relevant time limits for production of the report and their response.

The representatives of the CCA acknowledged the findings and conclusions presented by the FVO audit team. In addition, information on action already taken and planned, in order to address particular findings in the establishments visited, was provided.

8 Recommendations

An action plan, describing the action(s) taken or planned in response to the recommendations of this report and setting out a timetable to correct the deficiencies found, should be presented to the Commission within 25 working days of receipt of the report.

N°.	Recommendation
1.	Further develop the audit component of official control system at establishment level to ensure the verification of all the requirements of Model "BOV" certificate of part 2 of Annex II to Regulation (EU) No 206/2010.
2.	To improve the collection and analysis of official control results at central level in order to ensure the effectiveness of the official control system.
3.	To ensure that the information contained in the SIGSA livestock database is updated in order to guarantee that the requirements in points II.2.2 and II.2.3 of the Model "BOV" certificate laid down part 2 of Annex II to Regulation (EU) No 206/2010 are met.
4.	Ensure that ante-mortem inspection is performed only by official veterinarians to comply with the requirements of point II.1.4 of the Model "BOV" certificate laid down

N°.	Recommendation
	in part 2 of Annex II to Regulation (EU) No 206/2010.
5.	Ensure that post-mortem inspection is performed only by official auxiliaries to comply with the requirements of point II.1.4 of the Model "BOV" certificate laid down in part 2 of Annex II to Regulation (EU) No 206/2010.
6.	Review at central level the approval of labels in order to ensure that all establishments comply with the requirements of point 5 of Article 13 of Regulation (EC) No 1760/2000.

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_inspection_ref=2014-7226

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Reg. 1760/2000	OJ L 204, 11.8.2000, p. 1-10	Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97
Reg. 178/2002	OJ L 31, 1.2.2002, p. 1-24	Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
Reg. 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Reg. 2073/2005	OJ L 338, 22.12.2005, p. 1-26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs

Legal Reference	Official Journal	Title
Reg. 1099/2009	OJ L 303, 18.11.2009, p. 1-30	Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing
Reg. 119/2009	OJ L 39, 10.2.2009, p. 12-28	Commission Regulation (EC) No 119/2009 of 9 February 2009 laying down a list of third countries or parts thereof, for imports into, or transit through, the Community of meat of wild leporidae, of certain wild land mammals and of farmed rabbits and the veterinary certification requirements
Reg. 206/2010	OJ L 73, 20.3.2010, p. 1–121	Commission Regulation (EU) No 206/2010 of 12 March 2010 laying down lists of third countries, territories or parts thereof authorised for the introduction into the European Union of certain animals and fresh meat and the veterinary certification requirements
Dir. 96/93/EC	OJ L 13, 16.1.1997, p. 28-30	Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products
Dir. 98/83/EC	OJ L 330, 5.12.1998, p. 32-54	Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption