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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

ARGENTINA

FROM 05 TO 16 MAY 2014

IN ORDER TO EVALUATE THE CONTROL SYSTEMS IN PLACE GOVERNING THE PRODUCTION OF POULTRY MEAT AND PRODUCTS DERIVED THEREFROM INTENDED FOR EXPORT TO THE EUROPEAN UNION

In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.

Executive Summary

This report describes the outcome of an audit carried out by the Food and Veterinary Office in Argentina, from 5 to 16 May 2014.

The objectives of the audit were to evaluate whether the official controls systems for poultry meat and products derived therefrom destined for export to the European Union can provide equivalent guarantees to those required by European Union legislation and in particular Commission Regulation (EC) No 798/2008 and Commission Decision 2007/777/EC and to evaluate the follow-up actions taken by the competent authority in response to the recommendations made in report DG(SANCO)/2009-8062.

The report concludes that there is an adequate control system in place covering the production chain of poultry meat and products derived therefrom intended for export to the EU. In general the official controls provide guarantees that the establishments meet EU requirements even if some shortcomings noted by the audit team were not detected/recorded by the competent authority.

There are also weaknesses regarding ante-mortem, post-mortem inspections, animal welfare, export certification, official and own-check sampling for Salmonella and Listeria analyses.

An effective follow-up by the competent authority to the recommendations of the previous Food and Veterinary Office report for the sector was noted except for the one concerning ante-mortem inspection.

Overall the system of official controls is capable of ensuring that the poultry meat and products derived therefrom exported to the EU meet most of the relevant standards.

The report includes a number of recommendations addressed to the Argentinian competent authorities aimed at rectifying the identified shortcomings and enhancing the control system in place.

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Abbreviations and definitions used in this report

Abbreviation	Explanation
CA	Competent Authority
CCA	Central Competent Authority
EC	European Community
EU	European Union
FBO	Food Business Operator
FCI	Food Chain Information
FVO	Food and Veterinary Office
FSIS	Food Safety and Inspection Service
GHP	Good Hygiene Practices
GMP	Good Manufacturing Practices
HACCP	Hazard Analysis Critical Control Point
ISO	International Organization for Standardization
NRL	National Reference Laboratory
OA	Official Auxiliary
OV	Official Veterinarian
RASFF	Rapid Alert System for Food and Feed
RTE	Ready-to-Eat
SENASA	National Animal Health and Agro-food Quality Service
SOP	Standard Operating Procedure
USDA	United States Department of Agriculture

1 Introduction

The audit took place in Argentina from 5 to 16 May 2014 and was undertaken as part of the Food and Veterinary Office's (FVO) planned audit programme.

The audit team comprised two auditors from the FVO. Representatives from the Competent Authorities (CA) accompanied the audit team during the whole audit.

An opening meeting was held on 5 May 2014 with the Central CA (CCA) - National Animal Health and Agro-food Quality Service[1] (SENASA). At this meeting the audit team confirmed the objectives of, and itinerary for the audit, and requested additional information required for the satisfactory completion of the audit.

2 Objectives

The objectives of the current audit were to:

- evaluate whether the official controls systems for poultry meat and products derived therefrom destined for export to the European Union (EU) can provide equivalent guarantees to those required by EU legislation and in particular Commission Regulation (EC) No 798/2008 and Commission Decision 2007/777/EC;
- evaluate the follow-up actions taken by the CA in response to the recommendations made in report DG(SANCO)/2009-8062.

In terms of scope the audit focused on the organisation and performance of the CA, the export certification procedure, the official control systems in place covering production, processing and distribution chains applicable to poultry meat and products derived therefrom to be exported to the EU. Accordingly, relevant aspects of the EU legislation referred to in Annex 1 – *Legal references* – were used as technical basis for the audit.

The table below lists the sites visited and the meetings held in order to achieve the above objectives.

Competent authority visits		
CCA	1	Opening and closing meeting
Regional/Provincial CA	2	One local office and one Certification Office
Laboratory visits		
Official laboratory	1	SENASA National Reference Laboratory (NRL)
Primary production		
Poultry farm	1	Broiler farm
Food processing facilities		
Slaughterhouses	5	
Cutting plants	5	Attached to the slaughterhouses visited
Meat Product establishments	3	Attached to the slaughterhouses visited

3 Legal Basis

The audit was carried 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 of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal

1 *Servicio Nacional de Sanidad y Calidad Agroalimentaria*

health and animal welfare rules.

Full legal references to EU legal acts quoted in this report are provided in Annex 1. They refer, where applicable, to the last amended version.

4 Background

4.1 Historical Background

Argentina is included on the list of third countries from which the import of poultry meat and products derived therefrom into the EU is authorised (Part 1, Annex I to Regulation (EC) No 798/2008 and Part 2, Annex II to Decision 2007/777/EC).

The most recent FVO audit to Argentina on poultry meat and products derived therefrom took place in 2009 (ref. DG(SANCO)/2009-8062). The report of this audit highlighted deficiencies – inter alia – in relation to ante-mortem and post-mortem inspection procedures, to analytical methods for *Listeria monocytogenes* and *E. coli* and to establishments' compliance. The report –published on the Health and Consumers Directorate-General Internet site at http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=2355 – made a number of recommendations to the CA. Written guarantees have been received from the CA in relation to the implementation of those recommendations.

4.2 Production and trade information

The information in the table below was provided by the CCA and indicates the quantity of poultry meat and products derived therefrom exported to the EU in 2012 and 2013.

	2012 (tonnes)	2013 (tonnes)
Frozen chicken meat	23,694.00	11,430.00
Frozen poultry meat preparation	4,748.00	1,160.25
Frozen products derived from poultry meat	0.00	0.25

5 Findings And Conclusions

5.1 Legislation and implementing measures

Legal requirements

Article 46 of Regulation (EC) No 882/2004 states that Commission experts may carry out official controls in third countries in order to verify the compliance or equivalence of third-country legislation and systems with the relevant EU legislation.

Findings

Decree 4238/68 as amended provides the legal basis for the CA to perform official controls on poultry meat and products derived therefrom to comply with EU requirements. Chapter I, Section 1.1.4.1 of this Decree states that in the case of exports, products and the establishments that

manufacture them shall meet the conditions and requirements of the country of destination or those accepted as equivalent. Furthermore several resolutions, circulars and service orders have been issued by the CCA in order to set out clear instructions for the performance of inspections, sampling and supervision in the exporting establishments.

Recommendation No 1 made in report DG(SANCO)2009/8062 was: *"The CA should ensure that there are a sufficient number official veterinarians to carry out effectively inspection tasks in slaughterhouses in accordance with Regulation (EC) No 854/2004. In particular, ante-mortem inspection should be carried out in accordance with paragraph 6, Part A Chapter V Section IV and in paragraph 2, Chapter I, Section III of Annex I to Regulation (EC) No 854/2004; Post-mortem inspection should be carried out in accordance with Part B, Chapter V Section IV to Regulation (EC) No 854/2004 and Chapter IV Section II of Annex III to Regulation (EC) No 853/2004."*

In order to address this recommendation the CCA adopted a Service Order No 09/2009 instructing official veterinarians (OVs) appointed at slaughterhouses to directly supervise ante-mortem inspection tasks. Regarding post-mortem inspection the Service Order requires OVs to personally carry out inspection tasks in line with Regulation (EC) No 854/2004.

However, the audit team noted that the provisions for ante-mortem inspection differ from EU requirements. In one establishment visited the audit team was informed by the CA that ante-mortem inspection is carried out either by an OV or by Official Auxiliaries (OAs) and/or by slaughterhouse staff under OV supervision in line with the mentioned Service Order. Nevertheless, EU legislation requires that, if ante-mortem inspection is not carried out at the holding, the OV is to carry out a flock inspection at the slaughterhouse (paragraph 6, Part A, Chapter V, Section IV of Annex I to Regulation (EC) No 854/2004). When ante-mortem inspection is carried out at the holding it should be performed by an OV or an approved veterinarian (paragraph 3, Part A, Chapter V, Section IV of Annex I to Regulation (EC) No 854/2004).

Conclusions

While a comprehensive analysis of the Argentinian legislation was not carried out by the audit team, the domestic laws and implementing measures applicable to exports to the EU, with the exception of ante-mortem inspection at the slaughterhouses that could be carried-out by OAs and/or by slaughterhouse staff under OV supervision, are broadly in line with EU requirements related to the scope of this audit. Recommendation 1 of the previous FVO report can be considered as only partly addressed.

5.2 Competent Authority

Legal requirements

Article 46 of Regulation (EC) No 882/2004 specifies that official controls carried out in third countries by Commission experts shall have particular regard to the organisation of the third country's CAs, their powers and independence. This article also refers to other issues such as the training of CA staff in the performance of official controls, the existence and operation of documented control procedures and control systems based on priorities.

Findings

The CCA is SENASA within which the Directorate for Inspection of Products of Animal Origin is responsible for management control, training and legislation. The Co-ordination Office for Poultry, Egg Products, Minor Species and Game Products[2] of this Directorate carries out these tasks for the poultry sector.

2 *Coordinación de Aves, Huevos, Ovoproductos, Especies Menores y Productos de la Caza*

At central level there is a specific auditing service directly attached to the president of SENASA which is in charge of internal audits.

The CCA is responsible for elaborating the rules and procedures, for carrying out EU approval/re-approval inspection visits (see more under Chapter 5.3.1), for assigning approval numbers to establishments eligible for EU export and for the general supervision of the control systems.

SENASA regional offices[3] (14) are in charge of the overall supervision of the EU listed establishments and have coordinators to oversee food producing establishments including those of the poultry meat sector. Under each coordinator there are regional supervisors who are in charge of carrying out inspections in poultry meat establishments.

Each establishment is under permanent supervision by a veterinary inspection service team based in the establishment headed by an OV who in general, is assisted by other OV(s), OAs and by slaughterhouse staff. The audit team noted in the establishments visited that the performance of official services in establishments is evaluated during regional supervisor's visits on site which consist of an inspection of the premises and a review of official records kept by the OV.

Control by the CCA over its regional offices is based on internal audits and a management control system which includes visits to different establishments. In some establishments visited the audit team noted that the reports of management control visits were available which included a specific section regarding the recommendations for CA staff (see also Chapter 5.3.3(a)).

The audit team was informed by the CA that different training sessions are organised for OVs assigned to EU listed establishments. Evidence was provided to the audit team in the establishments visited of the CA staff's participation in training sessions organised by the CCA and by regional offices (e.g. training course on avian pathology, animal welfare, Hazard Analysis Critical Control Point (HACCP) systems, Good Manufacturing Practices (GMP), etc.).

The audit team found evidence that slaughterhouse staff performing official tasks under the supervision of SENASA officials receive specific training for the task to be performed. This training is provided by the OVs of the slaughterhouse concerned. In some cases after this training the slaughterhouse staff had to pass written exams which are considered by the CA as performance tests.

The audit team noted that OVs and OAs had a good knowledge of EU requirements. However, in one of the establishments visited (with several shortcomings) the OV in charge was neither aware of EU requirements regarding post-mortem inspection nor of the Service Order 09/2009 by which the CCA addressed the recommendation from the FVO audit in 2009 regarding this matter (see also Chapter 5.1.).

Argentinian legislation provides the CA with legal powers to suspend certification or withdraw approval if serious non-compliances are detected by the CA and not corrected by the Food Business Operator (FBO). The audit team reviewed cases when an establishment did not meet the importing country's requirements (other than the EU) and the CA temporarily suspended certification until all deficiencies had been corrected by the FBO.

Conclusions

The CA has appropriate structure and legal powers to perform official controls on poultry meat and products derived therefrom intended for EU export. The training system in place ensures that official staff is capable of performing their tasks correctly. In general CA's staff knowledge on the relevant EU requirements was adequate.

3 *Centros Regionales*

5.3 Official controls of production and placing on the market

5.3.1 Listing procedures

Legal requirements

Article 12(1) and (2) of Regulation (EC) No 854/2004 establish certain requirements for establishments involved in exports to the EU of products of animal origin, namely to appear on lists drawn up and updated by the CA in accordance with this Article.

Findings

To be approved for EU export, establishments should first get national approval to operate, followed by specific approval to export to the EU.

The current system of approval of establishments for the domestic market is based on a FBO's compliance with national requirements.

The CA informed the audit team that when approval is given to a FBO, a SENASA approval number is attributed and the official veterinary inspection service is provided to the establishment.

A FBO wishing to export to any foreign market, either to EU Member States or other destinations, must comply with SENASA Resolution No 108/2010, which sets out the administrative procedures to be followed by a FBO and by the CA regarding export approval.

A FBO must apply in writing to the CA for export approval. Following receipt of this application, the application must be approved by the head of the official veterinary inspection service at the establishment. Then this is communicated to the supervisor and to the Regional Thematic Coordinator in the relevant regional office. Their opinion is afterwards sent to the CCA which issues the final approval.

In establishments visited the re-evaluation of approval was carried out by the CA in 2012 and 2013, respectively (under national rules a re-approval evaluation should be carried out every two years). In all instances, before re-approval was given to the FBO, an on-site visit was carried out by the CCA. A uniform checklist covering specific EU requirements is used for this re-evaluation. The report includes overall assessment of FBO's compliance with the relevant EU requirements.

Approval/re-approval documents were found by the audit team in all establishments visited. The documents indicated the type of products and activity for which the establishment had been approved for export to the EU.

Conclusions

There are appropriate procedures in place for the approval and listing of establishments intending to export to the EU and these procedures were correctly implemented by the CA.

5.3.2 Controls specific to farms and to slaughterhouses: Ante-mortem and post-mortem inspection. Animal welfare provisions.

Legal requirements

The poultry meat export certificate established in Part 2 of Annex I to Regulation (EC) No 798/2008 indicates that poultry meat for EU export has to be obtained in accordance with several requirements. In particular:

- It has to be found fit for human consumption following ante and post-mortem inspections carried out in accordance with Chapter V of Section IV of Annex I to Regulation (EC) No

854/2004.

- It has to come from poultry that has been handled in accordance with the relevant provisions of Regulation (EC) No 1099/2009 in the slaughterhouse before and at the time of slaughter or killing (Animal welfare attestation).

Findings

Controls at farm level

The audit team visited one broiler farm providing birds to a slaughterhouse listed for export to the EU. The audit team was informed by the CA that all poultry farms rearing broilers intended for production of poultry meat for the EU market must be registered by SENASA in accordance with national legislation (SENASA Resolutions Nos 969/1997 and 542/2010).

The visited poultry farm was under official control and the flock records were properly kept. All relevant flock data were recorded in the "Breeder's register"[4] document: e.g. daily mortality, cumulative weekly mortality, vaccinations, use of veterinary medicinal products, visits of the treating veterinarian, water and feed consumption of the birds, farm registration number, etc. However, the audit team noted that no withdrawal period for the veterinary medicinal products or other treatments administered to the flockss were recorded in this document. This is not in line with Point 8, Section III, Part A of Annex I to Regulation (EC) No 852/2004.

The audit team noted adequate biosecurity conditions (required by national legislation). Reports of recent inspections carried out by the CA were available to the audit team. A uniform checklist based on Resolution 542/2010 was used during these CA inspections which includes among others an assessment of biosecurity conditions and recordkeeping.

Broilers sent to the slaughterhouse have to be accompanied by an electronically issued transport document and a breeder's register. The transport document is issued by the CA from a central database provided that there is no health or other movement restriction on birds in the area. The breeder's register is signed by the private veterinarian responsible for the farm (authorised by the CA) and contains information equivalent to the food chain information (FCI) of the EU. However, as mentioned above, the withdrawal periods of veterinary medicinal products used are not indicated since this information is not registered at the holding.

Ante-mortem inspection

The audit team was informed by the CA that ante-mortem inspection is carried out in the slaughterhouse on the arrival of animals.

Ante-mortem inspection is based on a documentary check, identification of the consignment, visual inspection of animals, animal welfare and necropsy of animals that died during transport to the slaughterhouse if this mortality figure exceeds 2%.

Ante-mortem inspection records were correctly kept in all the slaughterhouses visited.

In all but one of the slaughterhouses visited, ante-mortem inspection was carried out by the OV. However, in one slaughterhouse visited the audit team was informed by the CA that ante-mortem inspection may be carried out by the OV or by OAs or by slaughterhouse staff under the supervision of the OV in accordance with SENASA Service Order No 09/2009 (see Chapter 5.1). In this slaughterhouse the audit team noted a daily presence of an OV. However OV's working shifts did not match with working hours in the slaughterhouse and therefore the OV was not permanently present in the slaughterhouse during the slaughter of all birds. Although requested, no substantive evidence was provided to the audit team by the CA that EU the requirement as regards OV presence during ante-mortem/post-mortem inspection was fully respected during slaughter of birds for EU

4 *Registro del Criador*

export.

This is not in line neither with paragraph 6, Part A Chapter V Section IV of Annex I to Regulation (EC) No 854/2004, which stipulates that when ante-mortem inspection is not carried out at the holding, the OV is to carry out a flock inspection at the slaughterhouse. Nor does it concur with paragraph 2, Chapter I, and Part A (a) Chapter III of Section III of the same Annex, which prescribes that in relation to ante-mortem inspection only certain tasks can be carried out by staff of the establishment and require that in those cases the OV must be present during ante-mortem and post-mortem examinations.

In another slaughterhouse visited the audit team noted that spent hens intended for slaughter for EU export were not accompanied by the breeder's register document mentioned above. The CA informed the audit team that this is not mandatory for spent hens under national legislation. As a result the OV carrying out flock inspection of spent hens at a slaughterhouse has no information concerning any possible treatments administered to the animals. In a second slaughterhouse where the audit team found a similar situation, spent hens were accompanied, on a voluntary basis, with an additional document which included information equivalent to the FCI used in the EU.

Post-mortem inspection

The audit team noted that post-mortem inspection is carried out by slaughterhouse staff or by OAs under the supervision of an OV. In one establishment visited, the audit team was informed by the CA of the permanent presence of an OV at post-mortem inspection point.

By issuing Service Order No 09/2009 the CCA has also addressed the element of Recommendation No 1 dealing with post-mortem inspection made in report DG(SANCO)2009/8062 (see Chapter 5.1).

In all but one slaughterhouse visited the audit team was informed by the CA that during slaughter of consignments for EU export the OV personally carried out the daily inspection of the viscera and body cavity of a representative sample of the birds and the detailed inspection of a random sample of each batch of birds having the same origin and any further investigation if necessary as is required in Part B Chapter V, Section IV of Annex I to Regulation (EC) No 854/2004. This statement was backed up by daily official control records in the form of a statement of compliance with Service Order No 09/2009. However, in one establishment visited the OV did not follow the provisions contained in this Service Order and therefore it cannot be concluded that post-mortem inspection was carried out fully in line with EU equivalent requirements in this establishment.

Records of the results of post-mortem inspection were correctly kept and were available in the slaughterhouses visited.

Animal welfare

In all slaughterhouses visited, animal welfare officers were appointed by the FBOs and trained by representatives from a European university. The same training was provided to SENASA staff including OVs. Certificates of attendance were available to the audit team. However it is not ensured that persons carrying out relevant slaughter operations hold certificates of competence in line with Article 7 of Regulation (EC) No 1099/2009.

Animal welfare Standard Operating Procedures (SOPs) were available. In two out of five slaughterhouses visited the audit team noted that these SOPs contain different stunning parameters for the domestic and for the EU market. In these establishments the audit team was informed by the FBOs that EU stunning parameters are respected during slaughter of birds intended for EU markets only. During the visit the audit team noted that several birds slaughtered for domestic market presented signs of consciousness after stunning (corneal reflex, rhythmic breathing, wing flapping, etc.). However, in these slaughterhouses FBO monitoring records on stunning effectiveness in the

same period did not indicate any deviation. Although animal welfare, including FBO records on animal welfare, are under regular official controls no deficiencies had been recorded as regards the effectiveness of stunning.

In another slaughterhouse visited the audit team noted the presence of many carcasses with wing injuries. The OV explained to the audit team that those injuries are related to inadequate catching practices at the holding. The OV informed the audit team that he had already reported similar cases to the holding of origin.

Conclusions

Bio-security conditions and documentation kept on farms were adequate with the exception of lack of records concerning withdrawal periods which under national rules not mandatory for FBOs at farm. This is not in line with Point 8, Section III, Part A of Annex I to Regulation (EC) No 852/2004.

In some slaughterhouses visited the OVs cannot check and analyse some relevant information from the records of the holding of provenance of animals intended for slaughter and take account of the documented results of this check and analysis as they do not always receive such information, in particular concerning treatments administered and, where relevant, the withdrawal periods. This is not in line with Annex I, Section IV, Chapter V, Part B, Point 1 of Regulation (EC) No 854/2004 which stipulates that all birds are to undergo post-mortem inspection in accordance with Sections I of Annex I to the same Regulation (See Point A.1 of Chapter II of Section I of Annex I).

Ante-mortem and post-mortem inspection are not always implemented fully in line with EU requirements, in particular checks to be carried out personally by the official veterinarian are not respected.

In general, official controls can guarantee that EU animal welfare requirements are met for birds entering the EU production chain. However, there are some weaknesses in particular CA's capability to detect deficiencies related to stunning of birds.

5.3.3 Controls at establishment level

Legal requirements

The export health certificates for the relevant commodities contained in Regulation (EC) No 798/2008 and Decision 2007/777/EC indicate that the products shall come from an establishment implementing a programme based on HACCP principles in accordance with Regulation (EC) No 852/2004.

Article 4 and 10 and Annex II to Regulation (EC) No 852/2004.

Chapter II and III of Section II of Annex III to Regulation (EC) No 853/2004

Findings

a) General findings

Each establishment has a permanent official veterinary inspection service that carries out daily control activities e.g. GMPs, Sanitary SOPs, HACCP, FBO own-checks, traceability and animal welfare. A uniform checklist has been drafted by the CA to record these controls. The audit team noted that this checklist was used during official controls.

Official supervision of the establishments is carried out by the regional supervisor who completes a "Supervision Report" form. Such on-site visits are made to the establishments on a monthly basis (pursuant to SENASA Circular Letter No 4056). These visits cover, amongst other, the

establishment's facilities, general and specific hygiene conditions, export procedures and certain issues related to HACCP systems. Furthermore supervisory visits assess the performance of OV activities. A report of each visit is given to the FBO and the OV.

In addition, the CCA has management control programmes in place, and also visits the establishments based on an annual inspection plan. This annual visit covers, amongst other, the establishment's facilities, documents related to official controls and certification, hygiene practices, manufacturing processes, HACCP systems, sampling, staff training and maintenance.

In all establishments visited records of the official controls carried out by all levels of the CA were available. Where reports contained observations and recommendations for their correction, a plan for corrective actions was required with a deadline. Evidence of follow-up of corrective actions was also available.

However, in one establishment visited the audit team noted that in several instances the deadlines for FBO corrective actions were repeatedly extended by the OV and those deficiencies were still present at the time of the FVO audit visit.

b) Slaughterhouses, cutting plants and poultry meat products establishments

Four out of five establishments visited were found by the audit team to be broadly in line with EU requirements. Some deficiencies were noted. For example (Note: not all deficiencies were present in all establishments):-

- Surfaces (e.g. floor and wall junctions; ceilings, walls, floors) were not maintained in a sound condition (peeling paint, peeling of silicon sealer; broken floors, dirty surfaces) and were not easy to clean and disinfect which do not meet the requirements of paragraph 1 (a), (b), (f) Chapter II and paragraph 2(b), Chapter I of Annex II to Regulation (EC) No 852/2004.
- Premises were not protected against the formation of condensation which do not meet the requirements of paragraph 2(b), Chapter I of Annex II to Regulation (EC) No 852/2004.
- Absence of adequate facilities for cleaning, disinfecting and storage of equipment, such as cutting boards and knives which does not meet the requirements of paragraph 2, Chapter II of Annex II to Regulation (EC) No 852/2004.
- The layout, design and size of room used for cleaning of equipment (crates, containers) did not allow a hygienic performance of operations which do not meet the requirements of paragraph 2, Chapter I, Annex II to Regulation (EC) No 852/2004.
- Continuous spillage of digestive tract onto carcases due to inappropriate manual removal of viscera after post-mortem inspection which does not meet the requirements of paragraph 5, Chapter IV, Section II of Annex III to Regulation (EC) No 853/2004.
- Premises not properly laid out so as to avoid cross-contamination of the meat (bending of slaughter line after scalding in the scalding room), in particular not allowing constant progress of the slaughter process which do not meet the requirements of paragraph 2 (e), Chapter II, Section II of Annex III to Regulation (EC) No 853/2004.
- Use of hyper-chlorinated water (above national potable water limits) in one establishment for washing products (hen crests) exported to the EU which does not meet the requirements of Article 3(2) of Regulation (EC) No 853/2004.
- Inadequate sanitary conditions for storage of wrapping and packaging materials which do not meet the requirements of Chapter X of Annex II to Regulation (EC) No 852/2004.
- Inadequate hygiene practices during wrapping and packing operations which do not meet the requirements of Chapter X of Annex II to Regulation (EC) No 852/2004.

- Leakage of lubricant oil above exposed carcasses on automatic cutting line which does not meet the requirements of Chapter V, Annex II to Regulation (EC) No 852/2004.
- Inadequate cleaning of cages for live bird transport which does not meet the requirements of paragraph 3, Chapter I, Section II of Annex III to Regulation (EC) No 853/2004.

Only some of these deficiencies had been detected and reported during official controls. Nevertheless, when these deficiencies were detected by the audit team during visits in establishments, the OVs ordered immediate corrective actions wherever that was possible.

The fifth establishment visited presented several shortcomings such as:-

- Surfaces (e.g. floor and wall junctions; ceilings, walls, floors) were not maintained in a sound condition (peeling paint, peeling of silicon sealer; broken floors, dirty, rusty surfaces) and were not easy to clean and disinfect which do not meet the requirements of paragraph 1 (a), (b), (f) Chapter II and paragraph 2(b) Chapter I of Annex II to Regulation (EC) No 852/2004.
- Premises were not protected against the formation of condensation which do not meet the requirements of paragraph 2(b), Chapter I of Annex II to Regulation (EC) No 852/2004.
- Water and ice from ice machines not made, handled and stored under conditions that protect them from contamination which do not meet the requirements of paragraph 4, Chapter VII of Annex II to Regulation (EC) No 852/2004.
- Drainage channels not designed to avoid the risk of contamination (open flow of waste water) which do not meet the requirements of paragraph 8, Chapter I, Annex II to Regulation (EC) No 852/2004.
- The layout, design and size of room used for cleaning of equipment (crates, containers) did not allow hygienic performance of operations which do not meet the requirements of paragraph 2, Chapter I, Annex II to Regulation (EC) No 852/2004.
- Inadequate sanitary conditions for storage of wrapping and packaging materials which do not meet the requirements of Chapter X of Annex II to Regulation (EC) No 852/2004.
- Strong chlorine odour in a storage chilling room in the presence of unprotected poultry meat which does not meet the requirements of paragraph 3, Chapter IX of Annex II to Regulation (EC) No 852/2004.

Only some of these deficiencies had been previously detected by the CA during official controls. The audit team observed that the CA ordered some immediate corrective actions.

After the audit team visit the CCA informed the audit team about the CA's decision to suspend temporarily issuing of EU export veterinary certificates in this establishment until appropriate and effective corrective measures had been taken by the FBO and verified by the CA.

c) HACCP

HACCP plans were present in all visited establishments and covered all production flows. Critical Control Points were properly identified. HACCP plan implementation was generally satisfactory, properly documented and subject to regular official controls.

d) Own-checks

In all poultry establishments visited, there was a regular and comprehensive own-check sampling programme for microbiological analysis, which included product, water, ice and surface samples.

Samples are generally analysed in in-house laboratories and in some instances in (accredited) external ones.

As regards process hygiene criteria, poultry meat and products derived therefrom are sampled (including neck skin samples) regularly by the FBO or in some cases by the CA in accordance with Regulation (EC) No 2073/2005.

As regards food safety criteria, samples are taken from poultry Ready-to-Eat (RTE) products to test for *Salmonella* and for *Listeria monocytogenes*. However, the audit team noted in one establishment visited that instead of five sample units required under EU law, only one sample unit was taken from each sampled batch and analysed for *Listeria*.

The audit team was informed by the FBOs in visited establishments that they almost never had any positive results in cooked RTE products for *Salmonella* or for *Listeria monocytogenes*.

Poultry meat preparations are also tested for *Salmonella* and for other microorganisms in line with Regulation (EC) No 2073/2005.

However, provisions equivalent to current EU food safety rules as regards *Salmonella Enteritidis* and *Salmonella Typhimurium* in fresh poultry meat were not implemented in all establishments visited. Nevertheless in establishments visited the audit team noted that FBOs had implemented some additional measures to prevent *Salmonella* presence in poultry meat exported to the EU, in particular fresh poultry meat with non-compliant results for *Salmonella spp*. was excluded from the EU export chain.

The audit team noted in establishments visited that the method used by FBOs for *Salmonella* detection in poultry meat and products derived therefrom intended for EU export is the EU reference method (ISO 6579).

e) Traceability

Each establishment implements its own traceability system, which is evaluated by the CA.

The audit team noted that in all the establishments visited traceability systems were in place and records were properly kept.

Conclusions

There is a comprehensive system of official controls of the poultry establishments which is capable of ensuring that they meet the relevant EU standards. However, the deficiencies (mainly sanitary and maintenance issues) found by the FVO audit team and not recorded by CA controls demonstrate that this official control system has some weaknesses.

Comprehensive own-check sampling programmes for microbiological analyses are implemented with some deficiencies regarding the sampling protocols used for *Listeria* analysis.

Traceability and HACCP systems were in place and well implemented in all establishments visited.

5.3.4 Official sampling

Legal requirements

The statements contained in section II.1 of the poultry meat certificate included in Regulation (EC) No 798/2008, in particular points (c), (e) and (f), and in sections II.2.6 and II.2.7 of the certificate provided in Commission Decision 2007/777/EC.

Findings

In the establishments visited water samples were taken for microbiological and physicochemical parameters. Microbiological parameters, in line with the requirements of Council Directive 98/83/EC, were tested fortnightly. Physicochemical parameters were tested every six months.

The audit team noted that the CA regularly takes samples for microbiological analyses (*Salmonella*, *E. coli,* Total Bacterial Count, etc.) in all establishments visited according to the relevant service orders and in line with EU requirements.

However, in one establishment visited, the audit team noted that five samples, taken from one batch of RTE poultry products for *Salmonella* analysis, were pooled into one sample and only one laboratory result was available. ISO 6579 standard allows pooling of samples but evidence must be available to demonstrate that compositing (pooling the test portions) does not affect the result for that particular food. The audit team was informed by the CA that Argentinian legislation also requires the taking five sample units which are to be sent to the laboratory without pooling.

In the establishments visited the audit team also noted that samples of poultry meat were taken in order to analyse for the presence of residues in the framework of the National Residues Monitoring Plan (Directive 96/23/EC).

In all establishments visited the CA provided the audit team with evidence that the official sampling programme was implemented.

Conclusions

Comprehensive official sampling programmes for microbiological analyses are implemented with some deficiencies regarding the sampling protocols used for *Salmonella* analysis.

5.3.5 Rapid Alert System for Food and Feed (RAFF)

Legal requirements

Chapter IV of Regulation (EC) No 178/2002 creates and establishes rules for RASFF. Chapter II of Title VI of Regulation (EC) No 882/2004, on import conditions, indicates that the powers available to a third country, and the regularity and rapidity of the information supplied by a third country concerning hazards will be evaluated by Commission services.

Findings

Since 2012 there were four RASFF notifications (three of them due to detection of different *Salmonella spp*. in poultry meat or in poultry meat preparations and one due to the rupture of the cold chain during transport). The CA has put in place a procedure to be followed in order to investigate the factors that may have given rise to such notifications.

The audit team reviewed some RASFF notifications files. They were generally found to be appropriately investigated by the CA and adequate corrective actions were taken. However in one instance the audit team noted a delay of several months in communicating the notification from central level to the OV of the establishment concerned. The audit team was informed by the CCA that incomplete traceability information provided through the RASFF system caused the delay.

Conclusions

The CA has in place and implements adequate procedures to follow-up RASFF notifications.

5.4 LABORATORIES

Legal requirements

Article 46 of Regulation (EC) No 882/2004 indicates that Commission controls in third countries will have particular regard to the resources available to the CA, including diagnostic facilities. The Codex Alimentarius Guidelines require adequate quality controls and the use of validated analytical

methods.

Regulation (EC) No 2073/2005 sets out the EU reference analytical methods for microbiological analyses.

Findings

Laboratories performing the analysis of official samples shall be authorised by the CA to become part of the SENASA network of official laboratories. The requirements for authorisation are in Resolutions Nos 736/2006 and 246/2010. The CA informed the audit team that one of the conditions is to be accredited to ISO 17025 standard. The current SENASA requirement is that at least one test method for pathogens in foodstuff should be within the scope of accreditation.

SENASA network laboratories are regularly (annually) audited by SENASA specialists.

The audit team visited the NRL of SENASA. The laboratory is accredited to ISO 17025 standard by the Argentinian Accreditation Body. The audit team saw evidence that the accreditation body regularly performs external audits of the facilities. These audit reports were available, detailing deficiencies which had been corrected by the laboratory. The scope of accreditation includes food testing for *Salmonella* (ISO 6579 analytical method) and for *Listeria monocytogenes* (USDA-FSIS Version 07/2009 analytical method).

The audit team saw evidence that the laboratory regularly participates with satisfactory results in proficiency tests (including proficiency tests on detection and serotyping of *Salmonella* and detection of *Listeria*) organised by international providers. The audit team noted that in proficiency tests for *Listeria* detection the NRL used the (ISO) EU reference method.

The audit team also saw evidence that the NRL regularly (twice per year for pathogens) organises proficiency tests for all SENASA network laboratories in which participation is mandatory. In case of unsatisfactory results, procedures are established, which include close follow-up by the NRL (extra proficiency tests, investigation of cause in the laboratory concerned). The audit team also noted that while the NRL is not accredited for the ISO method for *Listeria* detection, this method was used in proficiency tests organised for SENASA network laboratories.

The laboratory visited has knowledgeable staff and evidence of training on particular methods was available to the audit team, including participation in training organised in cooperation with the European Commission (Better Training for Safer Food).

Recommendation No 3 of the previous FVO audit report (Ref.: DG(SANCO)2009-8062) required the CA to use analytical methods equivalent to the reference methods prescribed in Annex I of Regulation (EC) No 2073/2005 for *Listeria monocytogenes* and *E. Coli.*

The audit team noted that since 2010 only the ISO (EU reference) methods are used for analyses of poultry meat and products derived therefrom (including for *E. coli* and *Listeria monocytogenes* analyses) for EU exports in SENASA network laboratories.

Conclusions

Laboratories involved in microbiological analyses of poultry meat and products derived therefrom meet the relevant EU requirements. Recommendation No 3 of the previous FVO audit report can be considered as satisfactorily addressed.

5.5 Official certification

Legal requirements

Council Directive 96/93/EC lays down EU certification principles. Article 6 of the Directive

stipulates that the Commission shall ensure that the rules and principles applied by third-country certifying officers offer guarantees at least equivalent to those laid down in this Directive.

Annex VI to Regulation (EC) No 854/2004 lays down requirements for certificates accompanying imports.

The model certificates for poultry meat is established in Regulation (EC) No 798/2008 and for poultry meat products in Decision 2007/777/EC.

Findings

Certification of poultry meat and products derived therefrom intended for export is regulated in Disposition No 5/2003, approving the Manual for Final Export Certification. To obtain health certification, FBOs follow the procedures set forth in Circular Letter No 3510.

The system in place for certification is based on the issuing of provisional certificates covering the movement of EU eligible products from the exporting establishment to the Argentinian port/airport where the consignment leaves the country for the EU.

A FBO must apply for health certification to the official veterinary inspection service of the establishment, by submitting a sworn statement (affidavit). The sworn statement contains information on the product, manufacturing conditions, net weight, gross weight, batch number, destination, etc.

The provisional certificate is signed only after the OV has:

- verified that the information on the application is correct;
- verified that the conditions of the container to be used are met;
- verified the cleanliness of secondary packaging;
- verified the labelling;
- checked packing list.

The final health certificate is issued (replaces the provisional one) at the port/airport.

In all cases reviewed by the audit team the EU export health certification procedure had been correctly followed.

However the audit team noted that the final certificates, in particular for consignments sent by ship, were only signed and issued by the certification office (part of regional CA offices) when the ship had already left the port for several days (i.e. the consignment had left the CA's controls already for several days). However the date given on the final certificate is not the same date on which the certificate was signed and issued but the date when the consignment was loaded on board of the transport vessel (the day it left CA control). This is not fully in line with the provisions of paragraph 6 of Annex VI to Regulation (EC) No 854/2004 which requires that the certificate must be issued before the consignment to which it relates leaves the control of the CA of the third country of dispatch.

The language of the certificates reviewed was in line with the requirements of Regulation (EC) No 854/2004.

Conclusions

There is a detailed procedure in place for issuing of EU export health certificates. However, there are some weaknesses in its implementation, in particular as regards date certified.

6 Overall Conclusions

There is an adequate control system in place covering the production chain of poultry meat and products derived therefrom intended for export to the EU.

In general the official controls provide guarantees that the establishments meet EU requirements even if some shortcomings noted by the audit team were not detected/recorded by the CA.

There are also weaknesses regarding ante-mortem, post-mortem inspections, animal welfare, export certification, official and own-check sampling for *Salmonella* and *Listeria* analyses.

An effective follow-up by the CA to the recommendations of the previous FVO report for the sector was noted except for the one concerning ante-mortem inspection.

Overall the system of official controls is capable of ensuring that the poultry meat and products derived therefrom exported to the EU meet most of the relevant standards.

7 Closing Meeting

During the closing meeting held in Buenos Aires on 16 May 2014, the audit team presented the findings and preliminary conclusions of the audit to the CA.

During this meeting, the CA acknowledged all findings and preliminary conclusions presented by the audit team and provided a commitment to correct the deficiencies.

8 Recommendations

The CCA should provide Commission services with an action plan, including a timetable for its completion, within one month of receipt of the report, in order to address the following recommendations for poultry meat and products derived therefrom exported to the EU.

N°.	Recommendation
1.	The CA should ensure that FBOs at farms keep records on withdrawal periods of veterinary medicinal product or other treatments administered to the birds, when applicable, in line with Point 8, Section III, Part A of Annex I to Regulation (EC) No 852/2004.
2.	The CA should ensure that OVs at the slaughterhouses receive all the relevant information from the records of the holding of provenance of birds intended for slaughter in order to be able to check and analyse it and to take account of the documented results of this check and analyses when carrying out post-mortem inspection in accordance with Annex I, Section IV, Chapter V, Part B, Point 1 of Regulation (EC) No 854/2004, in particular information on treatments administered and, where relevant, the withdrawal periods.
3.	The CA should ensure that ante-mortem inspection is carried out in line with the relevant provisions of Regulation (EC) No 854/2004. In particular, requirements laid down in paragraph 6, Part A Chapter V Section IV and in paragraph 2, Chapter I,

N°.	Recommendation
	Section III of Annex I to Regulation (EC) No 854/2004 shall be taken into account when ante-mortem inspection is not carried out at the holding, the official veterinarian is to carry out a flock inspection at the slaughterhouse.
4.	The CA should ensure that post-mortem inspection is carried out in line with the relevant provisions of Regulation (EC) No 854/2004. In particular, requirements laid down in paragraph 1 Part B Chapter V, Section IV of Annex I to Regulation (EC) No 854/2004 should be taken into account (checks to be carried out personally by the official veterinarian).
5.	In order to meet the requirements of the animal welfare attestation contained in the veterinary certificate for poultry meat in Regulation (EC) No 798/2008, the CA should ensure that the deficiencies in relation to animal welfare identified by the audit team are corrected (see Chapter II of Regulation (EC) No 1099/2009 regarding requirements for stunning).
6.	The CA should ensure that the establishments exporting to the EU are in line with the relevant EU requirements or with equivalent requirements as required by Article 12 of Regulation (EC) No 854/2004, in particular the CA should ensure that the deficiencies recorded by the audit team concerning requirements of Regulation (EC) No 852/2004 and Regulation (EC) No 853/2004 are corrected in the establishments visited and are not present in other listed ones.
7.	The CA should ensure that FBOs' own-check sampling plans for Listeria analysis of poultry meat products involve the taking and testing of five sample units per batch in line with the requirements of Chapter 1 of Annex I to Regulation (EC) No 2073/2005.
8.	The CA should ensure that when the official sampling programmes are implemented, the sampling protocols used for Salmonella analysis are in line with the relevant EU requirements (see Chapter 1 of Annex I to Regulation (EC) No 2073/2005).

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=2014-7149

Annex 1 - Legal References

Legal Reference	Official Journal	Title
Dec. 2007/777/EC	OJ L 312, 30.11.2007, p. 49-67	2007/777/EC: Commission Decision of 29 November 2007 laying down the animal and public health conditions and model certificates for imports of certain meat products and treated stomachs, bladders and intestines for human consumption from third countries and repealing Decision 2005/432/EC
Dir. 96/23/EC	OJ L 125, 23.5.1996, p. 10-32	Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC
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
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. 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

Legal Reference	Official Journal	Title
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. 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. 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
Reg. 798/2008	OJ L 226, 23.8.2008, p. 1-94	Commission Regulation (EC) No 798/2008 of 8 August 2008 laying down a list of third countries, territories, zones or compartments from which poultry and poultry products may be imported into and transit through the Community and the veterinary certification requirements
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