United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

FEB 20 2003

Dr. Bernardo Cane
Presidente
Servicio Nacional de Sanidad y Calidad Agroalimentaria
Secretaria de Agricultura, Ganaderia, Pesca y Alimentacion
Paseo Colon 367-Piso 9
1063 Buenos Aires
Argentina

Dear Dr. Cane:

The Food Safety and Inspection Service has completed an on-site audit of Argentina's meat inspection system. The audit was conducted from May 21 through June 12, 2002. Enclosed is a copy of the final audit report. Comments from the Government of Argentina have been included as Attachment G to the final report. FSIS has amended the final audit report to reflect that there has only been *one* case of Foot and Mouth Disease in the province of Cordoba.

With regard to your comments about pre-shipment review, you state that Circular Letter 3390/99 was prepared at FSIS' request. Please provide a copy of this circular to FSIS as soon as possible. FSIS regulations require that, prior to shipping product, the establishment must review the records associated with the production of product, including the determination that all critical limits were met and, if appropriate, corrective actions were taken. During our next audit of Argentina, FSIS will again review pre-shipment review of associated documents by establishments producing product for export to the United States to determine if pre-shipment review is conducted appropriately and documented accordingly. If you would like to discuss this matter further, please contact me as soon as possible and I will arrange for a conference call.

If you have any questions regarding the audit or need additional information, please contact me by telephone at 202-720-3781, by facsimile at 202-690-4040, or by email at sally.stratmoen@fsis.usda.gov.

Sincerely,

Sally Stratmoen

Sally Stratmoen
Acting Director
Equivalence Staff
Office of International Affairs

Enclosure

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AUDIT REPORT FOR ARGENTINA
MAY 21 THROUGH JUNE 12, 2002

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Argentina's meat inspection system from May 21 through June 12, 2002. Eleven of the 34 establishments certified to export meat to the United States were audited. Eight of these were slaughter establishments; two were conducting processing operations only and one was a cold storage facility.

The last audit of the Argentinean meat inspection system was conducted in March-April 2001. Eight establishments were audited. The auditor found serious deficiencies at two establishments, which were then designated as marginal/re-review at the next audit. One major concern that was reported at that time: HACCP-implementation was deficient in seven of the eight establishments visited.

Cooked frozen beef, shelf stable canned beef, and cooked pork are eligible for export to the United States, but no fresh product is eligible at this time because of the outbreak of Foot and Mouth Disease in areas of Argentina.

From January 1 through April 30, 2002, Argentinean establishments exported nearly 15 million pounds of beef to the U.S. Port-of-entry (POE) rejections were 75,000 pounds (0.5%).

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Argentinean national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities. The third was conducted by on-site visits to establishments. The selection of the establishments was determined by the re-review of two establishments from the previous audit, (Est. 2067 & 2062), one was selected because of a metal contamination revealed at the import station (1921) and the rest were selected randomly. The fourth was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella* and/or *E. coli.*

Argentina's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials (this was the case with four establishments—see below).

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in seven of the 11 establishments visited; five of these, (Ests. 2067, 2062, 1014, 1378, and 1970), were recommended for 30-day letters of compliance issued by SENASA. Three establishments (Ests. 1462, 1918 and 2629) were found to be unacceptable due to the nature, extent and degree of findings that impacted on food safety and public health. One establishment (Est. 1921) was delisted because of a metal problem in product at the import station and it also had HACCP implementation deficiencies, one establishment (Est.2560) was delisted because of records deficiencies revealed in a records-only audit this was evident in the supervisors monthly report that was the same copy for 8 months with no findings. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

As stated above, one major concern had been identified during the last audit of the Argentinean meat inspection system, conducted in March-April 2001. During this new audit, the auditor determined that the concern had not been addressed and corrected completely.

Minor HACCP-implementation deficiencies had been found in all of the eight establishments visited (Ests.267, 2067, 2062, 1970, 2676, 2629, 2067, and 1989). During this new audit, implementation of the required HACCP programs was again found to be deficient in major ways (this was a repeat finding), on this occasion in nine (Ests. 2067, 2062, 1014, 1378, 1979, 1921, 2629, 1462, &1918) of the 10 establishments visited that were required to have HACCP programs. Details are provided in the Slaughter/ Processing Controls section later in this report.

Entrance Meeting

On May 21, 2002, an entrance meeting was held in the Buenos Aires offices of the Servicio Nacional de Sanidad y Calidad Agroalimentaria (SENASA), and was attended by Dr. Ernesto Rebagliati, Director of Inspection of Animal Products; Dr. Marcello Ballerio, Director of Fiscalization Agroalimentaria; Dr. Juan Demaria, Coordinator of Control; Dr. Miguel Nievas, SENASA Field Supervisor; Dr. Mario Forte, SENASA Field Supervisor; Dr. Graciano Luis, Director of Epidemiology; Mr. Francisco Pirovano, Agriculture Specialist U. S. Embassy and Dr. M. Douglas Parks, International Audit Staff Officer, FSIS, USDA. Topics of discussion included the following:

1. Itinerary for audit to include on-site visits, records only audits and laboratory audits.

2. Conditions surrounding establishment 1921 problems (metal in shipments sitting in New Jersey).

3. Enforcement and compliance for the past year.

4. New system of rating for the establishments.

5. The organization of SENASA and the new personnel.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Argentina's inspection system in March 2001. There were some personnel changes.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters or the inspection service. The records review focused primarily on food safety hazards and included the following:

- Supervisory visits to establishments that were certified to export to the U.S.
- Label approval records such as generic labels, and animal raising claims.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

The records of SSOP, HACCP, and all bacteria testing were not available in the headquarters offices.

The following concerns arose as a result the examination of these documents.

? The records of one establishment (Est. 2560) were examined and the Supervisor's Monthly Audit reports for the last eight months were not accurate and were not acceptable. Therefore, the establishment was delisted by SENASA Officials.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Argentina as eligible to export meat products to the United States were full-time SENASA employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Thirty-four establishments were certified to export meat products to the United States at the time this audit was conducted. Eleven establishments were visited for on-site audits. In eight of the 11 establishments visited, both SENASA inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products. In three establishments (1462, 1918 and 2629), controls were not in place that impacted on food safety and public health and one establishment (2560) had insufficient monthly oversight by the supervisor as revealed in the supervisor's monthly reports. These four establishments were delisted by SENASA.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories; intra-laboratory quality assurance procedures, including sample handling; and methodology.

The Official SENASA Laboratory in Martinez was audited on June 7, 2002. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done (this was not a deficiency).

Argentina's microbiological testing for *Salmonella* was being performed in government laboratories. In addition to the Official SENASA Laboratory, one of the private approved laboratories, Food Science Laboratory in Buenos Aires, was audited. The auditor determined that both laboratories were satisfactory and that the system met the criteria established for the

use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories have been accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported to the government or simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the 11 establishments:

Beef slaughter and boning – four establishments (1014, 1378, 1918, & 1970)
Beef slaughter, boning and cooking – four establishments (13, 1921, 2062, 2067)
Beef boning and processing only – two establishments (1462, 2629)
Cold Storage – one establishment (152)

SANITATION CONTROLS

Based on the on-site audits of establishments, Argentina's inspection system had controls in place for Sanitation Standard Operating Procedures both basic and on-going requirements.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations.

Cross-Contamination

1. In five establishments (2629, 2062, 1970, 1918 and 1921), there were rail grease spots and/or smears on carcasses.

2. In one establishment (2629), there were grease spots inside of packaged product.
3. In four establishments (1014, 1378, 1970 and 1921), the bung dropping employee was cutting across the anus and continuing the cut into other tissues without sanitizing the knife.

4. In three establishments, over-spray from the carcass wash was dropping from unsanitized overhead structures onto exposed carcasses.

5. In three establishments (2067, 2062, and 1921), there was condensate on unsanitized overhead structures above exposed product.

6. The moving visera table was not properly cleaned between uses in two establishments (1970 and 1918).

7. In two establishments (2067 and 1378), the contaminated pusher bar on the side skinner was touching exposed carcasses.

8. The carcass-split saw was not properly cleaned between carcasses in Establishment 2067.

Inspection officials and/or establishment personnel corrected all these deficiencies immediately.

ANIMAL DISEASE CONTROLS

Argentina's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Argentina's National Residue Testing Plan for 2002 was being followed, and was on schedule. The Argentinean inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals

SLAUGHTER/PROCESSING CONTROLS

The Argentinean inspection system had controls in place to ensure adequate ante-and post-mortem inspection procedures and dispositions, control and disposition of dead, dying, diseased or disabled animals, humane handling and slaughter.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system.

Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

Many of the HACCP programs were found not to meet the basic FSIS regulatory requirements.

1. In seven slaughter establishments (2629, 2067, 2062, 1014, 1970, 1918, and 1921), there was no CCP that addressed zero tolerance of feces, ingesta and milk.
2. In five establishments (2062, 1378, 1970, 1918 and 1921), the hazard analysis was either incomplete or missing.
3. In five establishments (2062, 1014, 1378, 1970 and 1921), there was no pre-shipment review of the HACCP CCPs for product destined for the U.S.
4. In Establishment 1462, there was no HACCP trained person available on staff.
5. In two establishments (13 and 2629), preventive action was not being recorded for failed CCPs.

Testing for Generic *E. coli*

Argentina has adopted the FSIS regulatory requirements for *E. coli* testing.

Eight of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were audited and found to meet the basic FSIS regulatory requirements.

Additionally, establishments had adequate controls in place to prevent meat products intended for Argentinean domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

The SENASA inspection system controls [control of restricted product and inspection samples, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from

other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Eight of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Argentina has adopted the FSIS regulatory requirements for *Salmonella* testing.

The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements.

Species Verification Testing

At the time of this audit, Argentina was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements. Argentina has applied for exemption of species testing but had not received permission at this time.

Monthly Reviews

These reviews were being performed by the Argentinean equivalent of Area Supervisors. All were veterinarians with many years of experience. Dr. Ernesto Rebagliati was in charge of the slaughter and processing establishments and Dr. Oscar Lernoud is Coordinator of Exportation to the United States.

The internal review program was not applied equally to both export and non-export establishments. Internal review visits were sometimes announced in advance by hours or a day or two to inspection personnel only, and were conducted, at times by individuals and at other times by a team of reviewers. These reviews are conducted at least once monthly, and sometimes two or three times within a month. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central SENASA offices in Buenos Aires, and were routinely maintained on file for a minimum of three years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated. A commission is empowered to conduct an in-depth review, and the results are reported to Drs. Rebagliati and Lernoud for evaluation. They then formulate a plan for corrective actions and preventive measures.

There was one problem encountered during the "records only" audit that was done in SENASA offices. One establishment, 2560, was delisted by SENASA because of irregularities revealed in the supervisor's monthly report on file in the SENASA office.

Enforcement Activities

Compliance and enforcement activities during the year 2001 for violations of the standards regulating the health and quality of products, by-products and derivatives of animal origin are detailed below. There were five situations that required action. Two establishments ceased operations during the last year and the certification was rescinded from these establishments. One establishment failed to meet its fiscal responsibilities to SENASA and was removed from the certified list and has not been re-instated as of this date. An establishment was removed from the certified list because it did not develop and implement a HACCP plan and another was removed because of an ongoing labeling problem.

Exit Meetings

An exit meeting was conducted in Buenos Aires on June 12, 2002. The participants included Dr. Ernesto Rebagliati, Director of Department of Products of Animal Origin; Dr. Marcelo Ballerio, Director of Fiscalization Agroalimentaria; Dr. Juan Demaria, Director of Controls; Dr. Oscar Lernoud, Coordinator of Exports to USA; Dr. Alberto Puentes, Coordinator of CREHA; Dr. Graciano Luis, Director of Epidemiology; Dr. V. Torres Leedham, Director of Laboratories; Mr. Miguel Donatelli, Coordinator of International Institutes; Mr. Donald Wimmer, Area Director USDA APHIS; Ms. Maria Pilar Bilotte, Assistant to Area Director USDA APHIS; Mr. Francisco Pirovano, Agriculture Specialist, U.S. Embassy and Dr. M. Douglas Parks, International Audit Staff Officer, USDA, FSIS.

The following topics were discussed:

1. The deficiencies in HACCP implementation. These were to be corrected as soon as possible.
2. The establishments that were delisted and the reasons for delistment. These problems would be solved very soon.
3. The establishments who were to be issued 30-day letters for compliance by SENASA. These letters were to be issued on this date and the results conveyed to USDA Policy no later than July 12, 2002. All deficiencies noted in these letters were to be corrected by the closing date.
4. Supervisor monthly review reports were not routinely scrutinized before being filed in SENASA office. They were to be examined carefully in the future before being filed.
5. Data for the previous year concerning enforcement and compliance was received and discussed.

6. The latest case of possible Foot and Mouth Disease in southern Buenos Aires was confirmed to be negative by the laboratory representative. Confirmation of one outbreak in Cordoba State in January 2002.
7. The new system of rating establishments and the consequences thereof.
8. The situation surrounding Establishment 1921, its delistment and the status of the x-ray machine to be installed by August 15, 2002.

CONCLUSION

The inspection system of Argentina was found to have ineffective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Eleven establishments were audited on-site. Five establishments were issued 30-day letters of compliance for HACCP implementation deficiencies. Three establishments were unacceptable due to the nature, extent and degree of problems that impacted on food safety and public health concerns. In addition one establishment was deemed unacceptable during the "records only" audit due to irregularities in the supervisor monthly reports and one establishment was delisted due to metal in the product at the import station and HACCP implementation deficiencies. The deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction.

Dr. M. Douglas Parks
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing
D. Data collection instrument for *Salmonella* testing
E. Laboratory Audit Forms
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. identified	7. Documentation done daily	8. Dated and signed
13	?	?	?	?	?	?	?	?
152	?	?	?	?	?	?	?	?
2629	?	?	?	?	?	?	?	?
2067	?	?	?	?	?	?	?	?
2062	?	?	?	?	?	?	?	?
1014	?	?	?	?	?	?	?	?
1462	?	?	?	?	?	?	?	?
1378	?	?	?	?	?	?	?	?
1970	?	?	?	?	?	?	?	?
1918	?	?	?	?	?	?	?	?
1921	?	?	?	?	?	?	?	?

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

Establishments 18, 995, 1399, 2035, 2560, 1989, 2025, 2082 and 2520

The records available in SENASA offices in Buenos Aires were reviewed. The supervisor's monthly reviews on U. S. Certified establishments was all that was available and these were not very detailed only generic entries were made. One establishment, 2506, was delisted as a result of these reviews when irregularities were found in the last 8 months reviews. There was nothing on SSOP, HACCP or any kind of microbiological testing or results also no records of inspection monitoring from the establishment.

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. (except Est. 152, which was a cold-storage facility) was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conduct-ed	3. Use & users includ-ed	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10.Adequate documentation	11. Dated and signed	12.Pre-shipmt. doc. review
13	?	?	?	?	?	?	?	?	?	?	?	?
152	cold	storage	only	HA-	CCP	Not	Reqd.					
2629	?	?	?	?	no	?	?	?	?	?	?	?
2067	?	?	?	?	no	?	?	?	?	?	?	?
2062	?	no	?	?	no	?	?	?	?	?	?	no
1014	?	?	?	?	no	?	?	?	?	?	?	no
1462	no	no	no	no	no	no	no	no	no	no	no	no
1378	?	no	?	?	?	?	?	?	?	?	?	no
1970	?	no	?	?	no	?	?	?	?	?	?	no
1918	?	no	?	?	no	?	?	?	?	?	?	?
1921	?	no	?	?	no	?	?	?	?	?	?	no

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

Establishments 18, 995, 1399, 2035, 2560, 1989, 2025, 2082 and 2520

The records available in SENASA offices in Buenos Aires were reviewed. The supervisor's monthly reviews on U. S. Certified establishments was all that was available and these were not very detailed only generic entries were made. One establishment, 2506, was delisted as a result of these reviews when irregularities were found in the last 8 months reviews. There was nothing on SSOP, HACCP or any kind of microbiological testing or results also no records of inspection monitoring from the establishment.

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 152, which was a cold-storage facility) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
13	?	?	?	?	?	?	?	?	?	?
152	cold	storage	only	not	reqd					
2629	Pro-	cessing	only	not	reqd					
2067	?	?	?	?	?	?	?	?	?	?
2062	?	?	?	?	?	?	?	?	?	?
1462	Pro-	cessing	only	not	reqd					
1014	?	?	?	?	?	?	?	?	?	?
1378	?	?	?	?	?	?	?	?	?	?
1970	?	?	?	?	no	?	?	?	?	?
1918	?	?	no	?	?	?	?	?	no	?
1921	?	?	?	?	?	?	?	?	?	?

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit: Establishments 18, 995, 1399, 2035, 2560, 1989, 2025, 2082 and 2520

The records available in SENASA offices in Buenos Aires were reviewed. The supervisor's monthly reviews on U. S. Certified establishments was all that was available and these were not very detailed only generic entries were made. One establishment, 2506, was delisted as a result of these reviews when irregularities were found in the last 8 months reviews. There was nothing on SSOP, HACCP or any kind of microbiological testing or results also no records of inspection monitoring from the establishment.

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
13	?	?	N/A	?	?	?
152	cold	storage	only	not	required	
2629	processing	only	not	required		
2067	?	?	N/A	?	?	?
2062	?	?	N/A	?	?	?
1014	?	?	N/A	?	?	?
1462	processing	only	not	required		
1378	?	?	N/A	?	?	?
1970	?	?	N/A	?	?	?
1918	?	?	N/A	?	?	?
1921	?	?	N/A	?	?	?

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

Establishments 18, 995, 1399, 2035, 2560, 1989, 2025, 2082 and 2520

The records available in SENASA offices in Buenos Aires were reviewed. The supervisor's monthly reviews on U. S. Certified establishments was all that was available and these were not very detailed only generic entries were made. One establishment, 2506, was delisted as a result of these reviews when irregularities were found in the last 8 months reviews. There was nothing on SSOP, HACCP or any kind of microbiological testing or results also no records of inspection monitoring from the establishment.

cc: Philip Shull, Counselor, U.S. Embassy, Buenos Aires
Jose Molina, Agricultural Attaché, Embassy of Argentina
Robert Hoff, FAS Area Officer
Sally Stratmoen, Acting Director, ES, OIA
Karen Stuck, Acting Dep. Asst. Adm., Office of International Affairs
Donald Smart, Director, Review Staff, PEER
Clark Danford, Acting Director, IEPS, OIA
Nancy Goodwin, ES, OIA
Amy Winton, State Department
Country File-Argentina (Audit FY02)

2/12/03

FSIS:OIA:ES:N Goodwin:bw:2/12/03:720-9187:1-27-03:Argentina FY02 final audit to CVO

Attachment E

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
June 7, 2002	Direcci n Laboratories y Control Technio DILAC TE

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
SENASA	Martinez, B. A. Argentina	1653 Si A. Fleming Martine B.A.

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. M. Douglas Parks	Dr. Vernica Leedham

	Residue Code/Name ▶		EVALUATION CODE	100	200	300	500	600	800	900	Hvm				
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #													
	Sample Handling	01		A	A	A	A	A	A	A	A				
	Sampling Frequency	02		A	A	A	A	A	A	A	A				
	Timely Analyses	03		A	A	A	A	A	A	A	A				
	Compositing Procedure	04		O	O	O	O	O	O	O	O				
	Interpret Comp Data	05		O	O	O	O	O	O	O	O				
	Data Reporting	06		A	A	A	A	A	A	A	A				
ANALYTICAL PROCEDURES	Acceptable Method	07		A	A	A	A	A	A	A	A				
	Correct Tissue(s)	08		A	A	A	A	A	A	A	A				
	Equipment Operation	09		A	A	A	A	A	A	A	A				
	Instrument Printouts	10		A	A	A	A	A	A	A	A				
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11		A	A	A	A	A	A	A	A				
	Recovery Frequency	12		A	A	A	A	A	A	A	A				
	Percent Recovery	13		A	A	A	A	A	A	A	A				
	Check Sample Frequency	14		A	A	A	A	A	A	A	A				
	All analyst w/Check Samples	15		A	A	A	A	A	A	A	A				
	Corrective Actions	16		A	A	A	A	A	A	A	A				
	International Check Samples	17		A	A	A	A	A	A	A	A				
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE	A	A	A	A	A	A	A	A				
OTHER REVIEW		19	EVAL. CODE												
		20	EVAL. CODE												

SIGNATURE OF REVIEWER: M Douglas Parks

DATE: June 7, 02

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
June 10, 2002	Food Science Laboratory

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
SENASA	Buenos Aires, Argentina	1136 Cosdarco Buenos Aires, Argentina

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. M. Douglas Parks	Ms Angelini Nora

	Residue Code/Name ▶			100	200	300	400	500	600	800	900	Hvm			
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE												
	Sample Handling	01		A	A	A	A	A	A	A	A	A			
	Sampling Frequency	02		A	A	A	A	A	A	A	A	A			
	Timely Analyses	03		A	A	A	A	A	A	A	A	A			
	Compositing Procedure	04		O	O	O	O	O	O	O	O	O			
	Interpret Comp Data	05		O	O	O	O	O	O	O	O	O			
	Data Reporting	06		A	A	A	A	A	A	A	A	A			
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A	A	A	A	A	A	A	A			
	Correct Tissue(s)	08		A	A	A	A	A	A	A	A	A			
	Equipment Operation	09		A	A	A	A	A	A	A	A	A			
	Instrument Printouts	10		A	A	A	A	A	A	A	A	A			
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	A	A	A	A	A	A	A	A	A			
	Recovery Frequency	12		A	A	A	A	A	A	A	A	A			
	Percent Recovery	13		A	A	A	A	A	A	A	A	A			
	Check Sample Frequency	14		A	A	A	A	A	A	A	A	A			
	All analyst w/Check Samples	15		A	A	A	A	A	A	A	A	A			
	Corrective Actions	16		A	A	A	A	A	A	A	A	A			
	International Check Samples	17		A	A	A	A	A	A	A	A	A			
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE	A	A	A	A	A	A	A	A	A			
OTHER REVIEW		19	EVAL. CODE												
		20													

SIGNATURE OF REVIEWER: M Douglas Parks

DATE: June 10, 02

Attachment F

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Sadowa Mar Del Plata, Buenos Aires	June 4, 2002	1921	Argentina
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Douglas Parks		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

EST. 1921

15 – The audit revealed the following problems:

- Heavy condensate on ceiling above packaging tables in the cooked product departm ent.
- Rail grease on carcasses in the Halal product cooler.
- At the bung drop station the employee was cutting across the anus and continuing h s skinning operation without sterilizing his knife.
- In the HACCP program there was no CCP for zero tolerance of feces, ingesta and n ilk, the hazard analysis was incomplete, there was no pre-shipment review.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Douglas Parks Est 1921	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Che :klist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Friar Reconquista, Santa Fe	5-31-2002	1970	Argentina
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Douglas Parks		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requ rements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific evert occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Samp :	
34. Species Testing	
35. Residue	
Pa t E - Other Requirements	
36. Export	
37. Import	
38. Establishment Gr unds and Pest Control	
39. Establishment Co nstruction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sev age	
43. Water Supply	
44. Dressing Rooms/ avatories	
45. Equipment and Ut ensils	
46. Sanitary Operatio s	X
47. Employee Hygien :	
48. Condemned Prod ct Control	
Part F - Inspection Requirements	
49. Government Staff ng	
50. Daily Inspection C verage	
51. Enforcement	
52. Humane Handling	
53. Animal Identificati n	
54. Ante Mortem Insp ction	
55. Post Mortem Insp ction	
Part G - Other Regulatory Oversight Requirements	
56. European Commun ty Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

EST. 1970

15 – In the HACCP plan there was no CCP for zero tolerance of feces, ingesta and milk.

15 – The hazard analysis was incomplete.

15 – No pre-shipment review of HACCP CCPs was done.

46 – The bung drop operator was cutting across the rectum and continuing the skinning opera ion without sanitizing the knife.

46 – The moving viscera table and the carcass split saw were not properly cleaned between u: es.

46 – Condensate from overhead structures, not cleaned and sanitized daily, was dropping ont exposed carcasses in cooler #2.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AN[DATE
Dr. M. Douglas Parks Est 1970	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Che :klist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT N O.	4. NAME OF COUNTRY
Finexcor Bernal, Buenos Aires	May 27, 2002	2062	Argentina
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Douglas Parks		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requ :ements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sampl :	
34. Species Testing	
35. Residue	
Pa t E - Other Requirements	
36. Export	
37. Import	
38. Establishment Gr unds and Pest Control	
39. Establishment Co istruction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sev age	
43. Water Supply	
44. Dressing Rooms/I avatories	
45. Equipment and Ut :nsils	
46. Sanitary Operatio s	X
47. Employee Hygien	
48. Condemned Prod ct Control	
Part F - Inspection Requirements	
49. Government Staff ig	
50. Daily Inspection C verage	
51. Enforcement	
52. Humane Handling	
53. Animal Identificati n	
54. Ante Mortem Insp ction	
55. Post Mortem Insp ction	
Part G - Other R egulatory Oversight Requirements	
56. European Commun y Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

EST. 2062

15 – In HACCP there was no CCP for zero tolerance of feces, ingesta and milk.

15 – In HACCP the hazard analysis was incomplete (no justification).

15 – In HACCP there was no pre-shipment review.

46 – Condensate was dripping from overhead structures that are not cleaned and sanitized dail ' in the cooked product area, the carcass cooler and the raw product tube stuffing area.

46 – Rail grease spots were on the carcasses in the cooler.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND	DATE
Dr. M Douglas Parks Est 2062		

Attachment F

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Swift Armour Rosario, Santa Fe	5-22-2002	13	Argentina
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Douglas Parks		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
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Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sampl	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygien	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

EST. 13

22 – In the HACCP records, preventive action was not recorded when necessary.

46 – A black unidentified substance was on the exposed product conveyor belt scraper

46 – Over-spray from overhead structures, not cleaned and sanitized daily, above the carcass wash was dripping on the exposed carcasses.

61. NAME OF AUDITOR

Dr. M. Douglas Parks est 13

62. AUDITOR SIGNATURE AND DATE

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Chec klist

1. ESTABLISHMENT NAME AND LCCATION	2. AUDIT DATE	3. ESTABLISHMENT N).	4. NAME OF COUNTRY
P & O Cold Logistics Pilar, Buenos Aries	5-23-2002	152	Argentina
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Douglas Parks		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requi ements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
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Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Par E - Other Requirements	
36. Export	
37. Import	
38. Establishment Gro nds and Pest Control	
39. Establishment Con truction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sew ge	
43. Water Supply	
44. Dressing Rooms/La atories	
45. Equipment and Ute sils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Produc Control	
Part F - Inspection Requirements	
49. Government Staffin	
50. Daily Inspection Co erage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspect on	
55. Post Mortem Inspect on	
Part G - Other Re gulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

No findings

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Douglas Parks Est 152	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Fco. Cepa Pontevedra, Buenos Aries	5-24-2002	2067	Argentina
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Douglas Parks		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operation	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

EST. 2067

12 – In the slaughter department, the side skinner pusher bar, which is contaminated, was touc ıing exposed tissues on the back of the carcasses.

12 –The carcass split saw was not completely cleaned and sanitized between carcasses.

I5 – In the HACCP plan there was not a CCP that addressed zero tolerance for feces, ingesta, ; nd milk.

46 – Heavily beaded condensate on overhead surfaces not cleaned and sanitized daily, was abc ve exposed carcasses in the carcass cooler #31.

46 –There was condensate on the ceiling of the preparation area of raw beef for stuffing tubes or cooked beef.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Douglas Parks Est 2067	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Che :klist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT N O.	4. NAME OF COUNTRY
Coto-Centro Integral de Comercializcion Capital Federal	5-23-2002	2629	Argentina
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Douglas Parks		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requ rements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product cortamination or adulteration.	X
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific evert occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Samp e	
34. Species Testing	
35. Residue	
Pa t E - Other Requirements	
36. Export	
37. Import	
38. Establishment Gr unds and Pest Control	
39. Establishment Cc nstruction/Maintenance	
40. Light	
41. Ventiiation	
42. Plumbing and Se age	
43. Water Supply	
44. Dressing Rooms/ avatories	
45. Equipment and U ensils	
46. Sanitary Operatic ns	X
47. Employee Hygier e	
48. Condemned Prod ct Control	
Part F - Inspection Requirements	
49. Government Staff ng	
50. Daily Inspection C overage	
51. Enforcement	
52. Humane Handlinç	
53. Animal Identificat n	
54. Ante Mortem Insp ction	
55. Post Mortem Insp ction	
Part G - Other Regulatory Oversight Requirements	
56. European Commu ity Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

EST. 2629

12/46 – Approximately half of about 25 carcasses examined in the cooler had spots and smear : of rail grease and hair on them.

12/46 – Four of eight vacuum packaged meat cuts that were examined had rail grease spots an 1 smears on the meat inside the package.

15 – In the HACCP program records, preventive action was not recorded where necessary.

22 – In the HACCP program there was no CCP or procedure in place to observe for defects (f ces, ingesta, and other contamination) on incoming carcasses.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Douglas Parks Est 2629	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Chec klist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT N D.	4. NAME OF COUNTRY
Quickfood San Jorge, Santa Fe	5-30-2002	1014	Argentina
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Douglas Parks		X ON-SITE AUDIT . DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requi ements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	XX
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sampl	
34. Species Testing	
35. Residue	
Pa t E - Other Requirements	
36. Export	
37. Import	
38. Establishment Gr nds and Pest Control	
39. Establishment Co struction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sev age	
43. Water Supply	
44. Dressing Rooms/L avatories	
45. Equipment and Ut nsils	
46. Sanitary Operatio s	X
47. Employee Hygien	
48. Condemned Prod t Control	
Part F - Inspection Requirements	
49. Government Staff g	
50. Daily Inspection C verage	
51. Enforcement	
52. Humane Handling	
53. Animal Identificati n	
54. Ante Mortem Insp ction	
55. Post Mortem Insp ction	
Part G - Other R egulatory Oversight Requirements	
56. European Commun ty Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

EST. 1014

15 – There was no CCP for the control of zero tolerance of feces ingesta and milk in the HACCI plan.

22 – No provision for pre-shipment review of HACCP CCPs was in place.

46 – The bung drop operator cut across the rectum and continued the skinning operation into oth r tissues without sanitizing the knife.

46 – Over-spray at the carcass wash dropped from overhead structures, which are not cleaned an l sanitized daily, onto exposed carcasses.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Douglas Parks Est 1014	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT N[illegible].	4. NAME OF COUNTRY
Consignaciones Rurales Berazategui, Buenos Aires		1378	Argentina
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Douglas Parks		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requi[illegible]ements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Par[illegible] E - Other Requirements	
36. Export	
37. Import	
38. Establishment Gro[illegible]nds and Pest Control	
39. Establishment Cor[illegible]struction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sew[illegible]ge	
43. Water Supply	
44. Dressing Rooms/L[illegible]vatories	
45. Equipment and Ut[illegible]nsils	
46. Sanitary Operation[illegible]	X
47. Employee Hygiene	
48. Condemned Produ[illegible]t Control	
Part [illegible] - Inspection Requirements	
49. Government Staffi[illegible]g	
50. Daily Inspection C[illegible]verage	
51. Enforcement	
52. Humane Handling	
53. Animal identificatic[illegible]n	
54. Ante Mortem Inspe[illegible]tion	
55. Post Mortem Inspe[illegible]tion	
Part G - Other R[illegible]egulatory Oversight Requirements	
56. European Commun[illegible]y Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

EST. 1378

13 – In the SSOP program, preventive action was not recorded where necessary.

15 – In the HACCP program, the hazard analysis was incomplete.

22 – No pre-shipment review of the HACCP CCPs was done for product destined for the Unite 1 States.

46 – The head hook sanitizer was at 64 degrees where it should be at 82 degrees C.

46 – At the bung drop area the operator was cutting across the rectum and continuing his skinn ng operation into other tissues without sanitizing his knife.

46 – There was over-spray from carcass washing falling from overhead structures not sanitized and cleaned daily onto the exposed carcasses.

46 – The side skinner pusher bar which is contaminated was touching exposed tissues of the ca cass back

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Douglas Parks Est 1378	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Frigorifico Oeste Carlos Tejedor, Buenos Aires	5-28-2002	1462	Argentina
	5. NAME OF AUDITOR(S) Dr. M. Douglas Parks		6. TYPE OF AUDIT [X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific evert occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

EST. 1462

13 – In the SSOP program, preventive action was not being recorded where necessary.

14 – There is not a trained person on the HACCP committee.

14 – The HACCP plan is grossly incomplete and incorrect as presented.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Douglas Parks Est 1462	

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Ecocarnes San Fernando, Buenos Aires	June 3, 2002	1918	Argentina
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. M. Douglas Parks		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	X
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	X
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	
24. Labeling - Net Weights	
25. General Labeling	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	X
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygien	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

EST. 1918

11 – Condensate was in the following places:

- The hallway where boning room cutting employees pass.
- Above the carcasses at the boning room pre-trim station.
- In the hallway where carcasses pass into the coolers.

11 – Dirty fan and curtain on the vacuum packaging machine.

11 – The moving viscera table was not properly cleaned between uses.

13 – In SSOP, preventive action was not recorded.

13 – A designated floor cleaning person, was touching exposed carcasses in the slaughter dep: rtment.

15 – In HACCP there was no CCP for zero tolerance of feces, ingesta and milk.

15 – In HACCP there was no hazard analysis.

29 – In E. coli testing there was no statistical analysis of results.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. M. Douglas Parks Est 1918	

Attachment G

NOTE No. 575/02.

[logo:]
Ministry of Production,
Secretariat of Agriculture, Livestock, Fishing, and Food
National Service of Agricultural Food Health and Quality

BUENOS AIRES - stamp:]DEC. 4, 2002

MADAM DIRECTOR:

I am writing to you in response to your note of October 16, 2002, accompanying the Final Draft of the Audit Report for the REPUBLIC OF ARGENTINA, which was prepared by Dr. Douglas PARKS.

I am happy to see that the "corrective measures" adopted and reported on July 8 were found to be correct, those made both by the establishments and by the respective Inspection Services, and that they remain equivalent to those in the UNITED STATES OF AMERICA.

After evaluating the work of the auditor, Dr. Douglas PARKS, there are no objections on grounds of procedure, appropriateness, and good disposition.

Simply in order to clarify matters, it would be well to mention, as we told Dr. Douglas PARKS at the proper moment, that what is said in items Num 15 and 22 of the "Foreign Establishment Audit Checklist" deserves to be reconsidered.

With regard to the statement that "zero tolerance visible in fecal contamination, intake or bedding prior to washing the carcasses" ought to be an obligatory CCP, our National Service was unaware of that change in the legislation because it had not been informed properly.

Only recently was that stated to the plants authorized to export to there after the audit, through Circular Letter No. 3485 / 02.

With regard to the "Revision of the CCPs of the HACCP Prior to Shipping" this agency was applying Circular Letter No. 3390/99 prepared at the request of the UNITED STATES OF AMERICA audit. It had a model pre-certification checklist that had to be filled out by the Inspection Service upon an application for company certification. One of the items to check was No. 7 which states "Sanitary Conditions of the Product and corresponds with CCP registries in HACCP for reference product."

This system has been applied from that time and there has been no objection in previous audits.

With regard to what is stated in the report about TWO (2 foci of Hoof and Mouth disease in the province of CORDOBA in January of this year, it is wrong, because there was ONE (1) case.

[logo:]
Ministry of Production,
Secretariat of Agriculture, Livestock, Fishing, and Food
National Service of Agricultural Food Health and Quality

Hence, we believe that those items should be reconsidered in the final report.

On another matter, in a reply to your note on November 6 of this year, with regard to the intention to audit our country next year between January 6, and February 14, I would make the following comments:

* A reply is now being made within the time periods agreed upon, to the final audit report of Dr. Douglas PARKS.

* It should be stated that the traditional vacation period in our country is between January 7 and February 14, and hence the establishments to be audited and the official staff here at the National Service take their ordinary annual time off.

Accordingly, I am requesting asking that the proposed date for the next audit be postponed to some time from April onward.

Best wishes.

[signature]
Dr. Bernardo Gabriel Cané
[illegible]

DOCTOR SALLY STRATMOEN
ACTING DIRECTOR
EQUIVALENCE DIVISION
OFFICE OF INTERNATIONAL AFFAIRS
NO DATE