

United States
Department of
Agriculture

Food Safety and Inspection Service Washington, D.C. 20250

FEB 2 0 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 andit of Argentina's meat inspection system. The audit was conducted from May 21 through 'une 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 Acting Director Equivalence Staff

Office of International Affairs

Strotmon

Enclosure

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/adult eration 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

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:

	1.Written	2. Pre-op	3. Oper.	4. Contact	5. Fre-	6. Respons-	7. Docu-	8. Dated
	program	sanitation	sanitation	surfaces	quency	ible indiv.	mentation	and signed
Est. #	addressed	addressed	addressed	addressed	addressed	identified	done daily	
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

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. Haz- ard an- alysis 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 des- cribed	8. Plan valida- ted	9. Adequate verific. procedures	10.Ade- quate docu- menta- tion	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

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

 $Establish ments\ 18,995,1399,2035,2560,1989,2025,2082\ and\ 2520$

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.

	1.Writ-	2. Samp-	3.Samp-	4. Pre-	5. Samp-	6. Pro-	7. Samp-	8. Using	9. Chart	10. Re-
	ten pro-	ler des-	ling lo-	domin.	ling at	per site	ling is	AOAC	or graph	sults are
Est. #	cedure	ignated	cation	species sampled	the req'd freq.	or method	random	method	of results	kept at least 1 yr
1.2	0	0	given	•			0			•
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

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:

	1. Testing	2. Carcasses	3. Ground	4. Samples	5. Proper site	6. Violative
Est. #	as required	are sampled	product is	are taken	and/or	est's stop
			sampled	randomly	proper prod.	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

Dr. Bernardo Cane

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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)

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

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

REVIEW DATE

NAME O FOREIGN LABORATORY

FOREIGN COUNTRY LABORATORY REVIEW

June 7, 2002

Direccion Laboratories y Control Technio DILACOTE

FOREIGN GOV'T AGENCY **SENASA**

CITY & COUNTRY Martinez, B. A. Argentina

ADDRES ; OF LABORATORY 1653 Si A. Fleming

Martine: B.A.

NAME OF REVIEWER Dr. M. Douglas Parks

NAME OF FOREIGN OFFICIAL Dr. Vernica Leedham

DI. M	Dr. M. Douglas Parks Dr. Vernica Leednam													
	Residue Code/Nar	ne	>	100	200	300	500	600	8)0	900	Hvm	-		
	REVIEW ITEMS	ITEM #	#											
	Sample Handling	01		A	A	A	A	A	4	A	A			
DURES	Sampling Frequency	02	CODE	A	A	A	A	A	4	A	A			
SAMPLING PROCEDURES	Timely Analyses	03	TION C	A	A	A	A	A	1	A	A			
APLING	Compositing Procedure	04	EVALUATION	0	О	o	o	0)	o	o			
SAN	Interpret Comp Data	05	E	0	o	o	o	0)	О	О			
	Data Reporting	06		A	A	A	A	A		A	A			
	Acceptable Method	07	CODE	A	A	A	A	A		A	A			
ANALYTICAL PROCEDURES	Correct Tissue(s)	08	ON CI	A	A	A	A	A		A	A			
ANAL	Equipment Operation	09	EVALUATION	A	A	A	A	A		A	A			
	Instrument Printouts	10		A	A	A	A	A	1.	A	A			
	Minimum Detection Levels	11		A	A	A	A	A	1.	A	A			
<u>5</u>	Recovery Frequency	12	_ 	A	A	A	A	A	i.	A	A		ļ	
URAN	Percent Recovery	13	000	A	A	A	A	A	£	A	A			
QUALITY ASSURANCE PROCEDURES	Check Sample Frequency	14	ALUATION	A	A	A	A	A	į.	A	A			
PROC	All analyst w/Check Samples	15	ALUA	A	A	A	A	A		A	A			
aUA	Corrective Actions	16	3	A	A	A	A	A	#	A	A			
	International Check Samples	17		A	A	A	A	A	4	A	A			
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE	A	A	A	A	A	A	A	A	-		
OTHER REVIEW		19	CODE											
OT REV		20	EVAL.				ı							
SIGNAT	URE OF REVIEWER	$\overline{}$								DATE				

SIGNATURE OF REVIEWER

les Varle

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS REVIEW DATE
June 10, 2002

NAME OF FOREIGN LABORATORY

FOREIGN COUNTRY LABORATORY REVIEW

CITY & COUNTRY

ADDRESS OF LABORATORY

Food Science Laboratory

Buenos Aires, Argentina

1136 Co isdarco Buenos Lires, Argentina

NAME OF REVIEWER Dr. M. Douglas Parks

FOREIGN GOV'T AGENCY

SENASA

NAME OF FOREIGN OFFICIAL

Ms Angelini Nora

	D : 1 0 1 W		_		200	200	100	500		000	000	77		
	Residue Code/Nar	ne ITEM #	-	100	200	300	400	500	6(0	800	900	Hvm		
	Sample Handling	01		A	A	A	A	A		A	A	A		
OURES	Sampling Frequency	02	CODE	A	A	A	A	A		A	A	A	·	
SAMPLING PROCEDURES	Timely Analyses	03	TION CC	A	A	A	A	A		A	A	A		
MPLING	Compositing Procedure	04	EVALUATION	0	o	o	o	0	()	O	О	o		
SAN	Interpret Comp Data	05		0	o	0	o	О	0	О	0	o		
	Data Reporting	06		A	A	A	A	A		A	A	A		
	Acceptable Method	07	CODE	A	A	A	A	A		A	A	A		
TICAL	Correct Tissue(s)	08	ION CC	A	A	A	A	A	1.	A	A	A		
ANALYTICAL PROCEDURES	Equipment Operation	09	EVALUATION	A	A	A	A	A		A	A	A		
	Instrument Printouts	10	E	A	A	A	A	A		A	A	A		
	Minimum Detection Levels	11		A	A	A	A	A	1.	A	A	A		
<u> </u>	Recovery Frequency	12	ايوا	A	A	A	A	A	4.	A	A	A		
URAN RES	Percent Recovery	13	CODE	A	A	A	A	A	1.	A	A	A		
QUALITY ASSURANCE PROCEDURES	Check Sample Frequency	14	EVALUATION	A	A	A	A	A	1.	A	A	A		
ALITY PRO	All analyst w/Check Samples	15	ALU,	A	A	A	A	A	1.	A	A	A		
au,	Corrective Actions	16		A	A	A	A	A	1	A	A	A		
	International Check Samples	17		A	A	A	A	A	1	A	A	A		
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE	A	A	A	A	A	,	A	A	A		
IEW		19	CODE											
OTHER	_	20	EVAL.											
SIGNAT	URE OF REVIEWER			1			<u>, </u>			DATE	;			

Manay or Jache

Jul 10,02

	ESTABLISHMENT NAME AND LOCATION	Z. AUDII U	416	3. E	STABLISHMENT	۷٥.	4. NAME OF COONTRY			
	Sadowa Mar Del Plata, Buenos Aires	June 4, 20	02	1	921	Argentina				
•	Mai Dei Flata, Duellos Afres	5. NAME OF	AUDITO	R(S)			6. TYPE OF AUDIT	***************************************		
		Dr. M. D	ouglas Pa	arks			X ON-SITE AUDIT	OOCHARIT	ALIDIT	
							CHARLE AGENT	DOCUMENT	AUDIT	
	ace an X in the Audit Results block to ind		compi	ıan:	ce with requ			olicable.		
Pa	rt A - Sanitation Standard Operating Procedures (S Basic Requirements	SSOP)	Audit Results				rt D - Continued nomic Sampling		Audit Results	
7.	Written SSOP			33.	Scheduled Sam					
8.	Records documenting implementation.			34.	Species Testing					
9.	Signed and dated SSOP, by on-site or overall authority.		•	35.	Residue					
S	anitation Standard Operating Procedures (SSOP)				P.	rt E -	Other Requirements			
	Ongoing Requirements			-						
	Implementation of SSOPs, including monitoring of implemen	tation.			Export					
	Maintenance and evaluation of the effectiveness of SSOP's. Corrective action when the SSOP's have failed to prevent directive action when the SSOP's have failed to prevent directive action.	ect			Import					
	product contamination or adulteration.	eci		38.	Establishment G	ounds 	and Pest Control			
13.	13. Daily records document item 10, 11 and 12 above.			39.	Establishment C	nstruc	tion/Maintenance			
	Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			40.	Light					
14.	Developed and implemented a written HACCP plan .			41.	Ventilation					
15.	Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective act	ions	Х	42.	Plumbing and Se	vage				
16.	Records documenting implementation and monitoring of the HACCP plan.			43.	Water Supply					
17,	The HACCP plan is signed and dated by the responsible			44.	Dressing Rooms	_avato	ies			
	establishment individual. Hazard Analysis and Critical Control Point			45.	Equipment and U	ensils				
	(HACCP) Systems - Ongoing Requirements			46.	Sanitary Operation	าธ				
18.	Monitoring of HACCP plan.			47.	Employee Hygier	е				
19.	Verification and validation of HACCP plan.			48.	Condemned Proc	ıct Co	ntrol			
20.	Corrective action written in HACCP plan.									
21.	Reassessed adequacy of the HACCP plan.				Pan	+ - In	spection Requirements			
22.	Records documenting: the written HACCP plan, monitoring of critical control points, dates and times of specific event occur		1	49.	Government Staf	ng				
	Part C - Economic / Wholesomeness			50.	Daily Inspection (overag	ge			
23.	Labeling - Product Standards			51.	Enforcement					
24.	Labeling - Net Weights									
	General Labeling			J2.	Humane Handling			-		
26.	Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mois	sture)		53.	Animal Identificat	חכ				
	Part D - Sampling Generic <i>E. coli</i> Testing			54.	Ante Mortem Insp	ction				
27.	Written Procedures			55.	Post Mortem Insp	ction				
28.	Sample Collection/Analysis									
	Records		-		Part G - Other	≀egui	atory Oversight Requirement	nts		
	<u> </u>				European Commun	itu Dis	activon			
S	almonella Performance Standards - Basic Require	ements		56 .	European Commu					
30.	Corrective Actions			57.	Monthly Review		1000000			
31.	Reassessment			58.						
32.	Written Assurance			59.						

- 15 The audit revealed the following problems:
 - Heavy condensate on ceiling above packaging tables in the cooked product department.
 - 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.

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT 1 O. 4. NAME OF COUNTRY	
Friar Reconquista, Santa Fe	5-31-2002	1970 Argentina	
Reconquisa, sana i c	5. NAME OF AUDI	TOR(S) 6. TYPE OF AUDIT	
	Dr. M. Douglas	s Parks X ON-SITE AUDIT DOCUME	ENT AUDIT
Place an Y in the Audit Results block to ind	licato noncom	pliance with requirements. Use O if not applicable	
Part A - Sanitation Standard Operating Procedures (1
Basic Requirements	Resul		Audit Results
7. Written SSOP		33. Scheduled Samp :	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Pat E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implemen	ntation.	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
 Corrective action when the SSOPs have failed to prevent dir product contamination or aduteration. 	ect	38. Establishment Gr unds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Cc istruction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light 41. Ventilation	
14. Developed and implemented a written HACCP plan .		TI. VERBICATOR	
 Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective act 	tions. X	42. Plumbing and Sev age	
 Records documenting implementation and monitoring of the HACCP plan. 		43. Water Supply 44. Dressing Rooms/i avatories	
 The HACCP plan is signed and dated by the responsible establishment individual. 		45. Equipment and Utensils	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46. Sanitary Operatio s	X
18. Monitoring of HACCP plan.			
19. Verification and validation of HACCP plan.		47. Employee Hygien	
- Lawrence	,	48. Condemned Product Control	
Corrective action written in HACCP plan. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
<u> </u>		****	
Records documenting: the written HACCP plan, monitoring of critical control points, dates and times of specific event occur	rences.	49. Government Staffing	-
Part C - Economic / Wholesomeness 23. Labeling - Product Standards		50. Daily Inspection C overage	
24. Labeling - Net Weights		51. Enforcement	
25. General Labeling	-	52. Humane Handling	
26. Fin, Prod Standards/Boneless (Defects/AQL/Pork Skins/Mois	sture)	53. Animal Identificati n	-
Part D - Sampling			_
Generic <i>E. coli</i> Testing		54. Ante Mortem Insp otion	
27. Written Procedures		55. Post Mortem Inspiction	
28. Sample Collection/Analysis		Part G - Other Regulatory Oversight Requirements	
29. Records			
Salmonella Performance Standards - Basic Require	ements	56. European Commur ty Directives	
30. Corrective Actions		57. Monthly Review	
31. Reassessment		58.	
32. Written Assurance		59.	

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

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT D	AIE	3. E	STABLISHMENT	O.	4. NAME OF COUNTRY	
Finexcor Bernal, Buenos Aires	May 27, 2	002	2	062		Argentina	
Bernal, Buenos Aires	5. NAME OF	AUDITO	R(S)			6. TYPE OF AUDIT	
	Dr. M. D	ouglas Pa	ırks			X ON-SITE AUDIT DOCUM	MENT AUDIT
Place an X in the Audit Results block to inc	dianta non	compli	ian	oo with room			
Part A - Sanitation Standard Operating Procedures (1411 1		_	t D - Continued	
Basic Requirements	000.7	Audit Results				nomic Sampling	Audit Results
7. Written SSOP			33.	Scheduled Sampl	,		
8. Records documenting implementation.			34.	Species Testing			
9. Signed and dated SSOP, by on-site or overall authority.			35.	Residue			
Sanitation Standard Operating Procedures (SSOP)				Pa	tE-	Other Requirements	
Ongoing Requirements 10. Implementation of SSOP's, including monitoring of impleme	ntation		36	Export		•	
11. Maintenance and evaluation of the effectiveness of SSOP's				Import			
Corrective action when the SSOPs have failed to prevent disproduct contamination or aduteration.				Establishment Gr	unds a	and Pest Control	
13. Daily records document item 10, 11 and 12 above.			39.	Establishment Co	ıstruct	ion/Maintenance	
Part B - Hazard Analysis and Critical Control			40.	Light			
Point (HACCP) Systems - Basic Requirements			41.	Ventilation			
Developed and implemented a written HACCP plan . Contents of the HACCP list the food safety hazards.			42	Plumbing and Sev			
critical control points, critical limits, procedures, corrective ac		X	-	Water Supply			
 Records documenting implementation and monitoring of the HACCP plan. 				Dressing Rooms/I		adi	
 The HACCP plan is signed and dated by the responsible establishment individual. 			-	Equipment and Ut			
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements			46.	Sanitary Operation	s		X
18. Monitoring of HACCP plan.			47.	Employee Hygien			
19. Verification and validation of HACCP plan.			48	Condemned Produ	at Cor	etrol	
20. Corrective action written in HACCP plan.							
21. Reassessed adequacy of the HACCP plan.				Part	= - Ins	spection Requirements	
22. Records documenting: the written HACCP plan, monitoring of critical control points, dates and times of specific event occur.	of the urrences.		49.	Government Staff	ng		i
Part C - Economic / Wholesomeness			50.	Daily Inspection C	verag	е	
23. Labeling - Product Standards			51.	Enforcement			
24. Labeling - Net Weights			52	Humane Handling			
25. General Labeling							
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mol	isture)		53.	Animal Identification	n		
Part D - Sampling Generic <i>E. coli</i> Testing			54.	Ante Mortem Insp	otion		
27. Written Procedures			55.	Post Mortem Inspa	tion		
28. Sample Collection/Analysis				Dort C. Other I		stone Overight Dequipments	
29. Records				Part G - Other i	eguia	atory Oversight Requirements	
Salmonella Performance Standards - Basic Requir	rements		56.	European Commun	y Dire	ctives	
30. Corrective Actions			57.	Monthly Review			
31. Reassessment			58.				
32. Written Assurance			59.				
						· · · · · · · · · · · · · · · · · · ·	

- 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.

 ESTABLISHMENT NAME AND LOCATION 	2. AUDIT DATE		B. ESTABLISHMENT N	N D.	4. NAME OF COUNTRY				
Swift Armour	5-22-2002		13		Argentina				
Rosario, Santa Fe	5. NAME OF AL	JDITOF	(S)		6. TYPE OF AUDIT				
	Dr. M. Do	mala	Parke		X ON SITE AUDIT DOCUM				
	<u> </u>			-	DOCOM	ENT AUDIT			
Place an X in the Audit Results block to inc		mpli	ance with requ			e.			
Part A - Sanitation Standard Operating Procedures (Basic Requirements		udit ≋sults			rt D - Continued onomic Sampling	Audit Results			
7. Written SSOP			33. Scheduled Samp	Ī					
8. Records documenting implementation.			34. Species Testing						
9. Signed and dated SSOP, by on-site or overall authority.			35. Residue						
Sanitation Standard Operating Procedures (SSOP)			Pa	ıtE-	Other Requirements]:			
Ongoing Requirements 10. Implementation of SSOP's, including monitoring of implement	ntation	-	36. Export						
11. Maintenance and evaluation of the effectiveness of SSOP's.	itation.		37. Import						
12. Corrective action when the SSOPs have falled to prevent dir	rect								
product contamination or adulteration.			38. Establishment Gr						
13. Daily records document item 10, 11 and 12 above.			39. Establishment Co	struc	tion/Maintenance				
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements			40. Light						
14. Developed and implemented a written HACCP plan .		$\neg \neg$	41. Ventilation						
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective ac	tions.		42. Plumbing and Sev	age					
 Records documenting implementation and monitoring of the HACCP plan. 			43. Water Supply						
The HACCP plan is signed and dated by the responsible establishment individual.		⊢	44. Dressing Rooms/I		ries				
Hazard Analysis and Critical Control Point			45. Equipment and Ut	insils					
(HACCP) Systems - Ongoing Requirements			46. Sanitary Operation	s		X			
18. Monitoring of HACCP plan.			47. Employee Hygien						
19. Verification and validation of HACCP plan.			48. Condemned Produ	ot Co	ntrol				
20. Corrective action written in HACCP plan.		- }							
21. Reassessed adequacy of the HACCP plan.			Part	= - In	spection Requirements				
Records documenting: the written HACCP plan, monitoring o critical control points, dates and times of specific evert occu			49. Government Staff	ng					
Part C - Economic / Wholesomeness			50. Daily Inspection C	overag	ge				
23. Labeling - Product Standards			51. Enforcement						
24. Labeling - Net Weights									
25. General Labeling			52. Humane Handling						
26. Fin. Prod Standards/Boneless (Defects/AQL/Pork Skins/Mois	sture)	!	53. Animal Identificati	n					
Part D - Sampling Generic <i>E. coli</i> Testing			4. Ante Mortem Insp	ction					
27. Written Procedures		Ę	5. Post Mortem Insp	otion					
28. Sample Collection/Analysis									
29. Records			Part G - Other	!egui	atory Oversight Requirements				
Salmonella Performance Standards - Basic Requir	ements	5	6. European Commur	ty Dire	ectives				
30. Corrective Actions		5	7. Monthly Review						
31. Reassessment		5	8.						
32. Written Assurance			9.						

- 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.

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT N). 4. NAME OF COUNTRY	
P & O Cold Logistics	5-23-2002	152	Argentina	
Pilar, Buenos Aries	5. NAME OF AU	DITOR(S)	6. TYPE OF AUDIT	
	Dr. M. Dougl	ac Parke	X ON SITE AUDIT	
			DOCOME	ENT AUDIT
Place an X in the Audit Results block to ind		npliance with requi		Э.
Part A - Sanitation Standard Operating Procedures (S Basic Requirements	SSOP) Aut		Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample		
8. Records documenting implementation.		34. Species Testing		
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue		
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Par	E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implemen	tation.	36. Export		
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import		
 Corrective action when the SSOPs have failed to prevent direction product contamination or adulteration. 	ect	38. Establishment Gro	nds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Con	truction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light		
14. Developed and implemented a written HACCP plan .		41. Ventilation		
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective act	ions.	42. Plumbing and Sewa	ge	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply		_
The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/La 45. Equipment and Ute		
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		46. Sanitary Operations		
18. Monitoring of HACCP plan.		47. Employee Hygiene		
19. Verification and validation of HACCP plan.				
20. Corrective action written in HACCP plan.		48. Condemned Produc	Control	
21. Reassessed adequacy of the HACCP plan.		Part F	- Inspection Requirements	
Records documenting: the written HACCP plan, monitoring of critical control points, dates and times of specific event occur.	the remes	49. Government Staffin		
Part C - Economic / Wholesomeness		50. Daily Inspection Co		-
23. Labeling - Product Standards				
24. Labeling - Net Weights		51. Enforcement		
25. General Labeling		52. Humane Handling		
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mois	ture)	53. Animal Identification	1	1
Part D - Sampling				
Generic <i>E. coli</i> Testing		54. Ante Mortem Inspec	i on	
27. Written Procedures		55. Post Mortem Inspec	t on	
28. Sample Collection/Analysis		Dort C. Other De	auloton Oversight Descripments	
29. Records		Part G - Other Re	gulatory Oversight Requirements	
Salmonella Performance Standards - Basic Require	ments	56. European Community	ρ Directives	
30. Corrective Actions		57. Monthly Review		
31. Reassessment		58.		
32. Written Assurance		59.		

No findings

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DAT	E 3	ESTABLISHMENT N) .	4. NAME OF COUNTRY	
Fco. Cepa Pontevedra, Buenos Aries	5-24-2002		2067		Argentina	
Tollevedia, Buellos Aries	5. NAME OF A	UDITOR	S)		6. TYPE OF AUDIT	
	Dr. M. Do	uglas Parl	(S		X ON-SITE AUDIT DOC	UMENT AUDIT
Place an X in the Audit Results block to in-	dicate nonc	omplia	nce with requi	em	ents. Use O if not applica	ble.
Part A - Sanitation Standard Operating Procedures ((0000)	Audit			rt D - Continued	Audit
Basic Requirements		Results		Eco	onomic Sampling	Results
7. Written SSOP			33. Scheduled Sampl	€		
8. Records documenting implementation.			34. Species Testing			
9. Signed and dated SSOP, by on-site or overall authority.			35, Residue			
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements			Pa	ı E-	Other Requirements	
10. Implementation of SSOP's, including monitoring of impleme	ntation.		36. Export	- —		
11. Maintenance and evaluation of the effectiveness of SSOP's			37. Import			
Corrective action when the SSOPs have failed to prevent diproduct contamination or adulteration.	irect	X 3	88. Establishment Gro	nds	and Pest Control	
13. Daily records document item 10, 11 and 12 above.		3	9. Establishment Co	r struc	tion/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		4	10. Light			
14. Developed and implemented a written HACCP plan .		4	1. Ventilation			
15. Cortents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective as	rtions	X Z	2. Plumbing and Sev	ıge		
16. Records documenting implementation and monitoring of the HACCP plan.			3. Water Supply			
17. The HACCP plan is signed and dated by the responsible		1-	4. Dressing Rooms/L		ries	
establishment individual. Hazard Analysis and Critical Control Point			5. Equipment and Ut	r nsils		
(HACCP) Systems - Ongoing Requirements		4	6. Sanitary Operation	٠,		X
18. Monitoring of HACCP plan.		4	7. Employee Hygien			
19. Verification and validation of HACCP plan.		4	8. Candemned Produ	t Co	ntrol	
20. Corrective action written in HACCP plan.		\vdash				
21. Reæsessed adequacy of the HACCP plan.			Part	- In	spection Requirements	
22 Records documenting: the written HACCP plan, monitoring of critical control points, dates and times of specific event occur.		4	9. Government Staffi			-
Part C - Economic / Wholesomeness		. 5	0. Daily Inspection C	/erag	ge	
23. Labeling - Product Standards		5	1. Enforcement			
24. Labeling - Net Weights		-	***************************************			
25. General Labeling		5.	2. Humane Handling			
26. Fin. Prod Standards/Boneless (Defects/AQL/Pork Skins/Mo	isture)	5	3. Animal Identification	ן נ		
Part D - Sampling Generic <i>E. coli</i> Testing		5-	4. Ante Mortem Inspe	tion		
27. Written Procedures		5	5. Post Mortem Inspe	tion		
28. Sample Collection/Analysis						
29. Records			Part G - Other F	egu!	atory Oversight Requirements	
Salmonella Performance Standards - Basic Requi	rements	56	. European Commun	i / Dire	ectives	
30. Corrective Actions		57	'. Monthly Review			
31. Reassessment		58	3.			
32. Written Assurance		59	 			
			·			

- 12 In the slaughter department, the side skinner pusher bar, which is contaminated, was touc ung 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, and milk.
- 46 Heavily beaded condensate on overhead surfaces not cleaned and sanitized daily, was abx 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.

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT D	ATE	3. E	ESTABLISHMENT	0.	4. NA	ME OF COUNTR'	Y		
Coto-Centro Integral de Comercializcion Capital Federal 5-23-20 5. NAMEO		2002		2629		Argentina				
		OF AUDITOR(S)			6. TYPE OF AUDIT					
Dr. M.			arko			X ON SITE AUDIT DOCUME				
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Part A - Sanitation Standard Operating Procedure Basic Requirements	es (SSOP)	Audit Results					Continued c Sampling		Audit Results	
7. Written SSOP			33	. Scheduled Samp	;					
8. Records documenting implementation.			34	Species Testing				-		
9. Signed and dated SSOP, by on-site or overall authority.			35.	Residue						
Sanitation Standard Operating Procedures (SSC Ongoing Requirements	OP)			Pa	t E - 0	Other	Requirements			
10. Implementation of SSOP's, including monitoring of imple	ementation.		36	Export		_				
11. Maintenance and evaluation of the effectiveness of SSO	P's.		37.	Import						
 Corrective action when the SSOPs have failed to prever product contamination or adulteration. 	nt direct	Х	38.	Establishment Gr	rundsa	ind Pe	st Control			
13. Daily records document item 10, 11 and 12 above.			39,	Establishment Co	a istructi	ion⁄ Ma	intenance			
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements				Light						
14. Developed and implemented a written HACCP plan .			41.	Ventilation						
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective	e actions.	Х	42.	Plumbing and Se	age					
 Records documenting implementation and monitoring of HACCP plan. 	the		<u> </u>	Water Supply						
The HACCP plan is signed and dated by the responsible establishment individual.			ļ	Dressing Rooms/ Equipment and U		es				
Hazard Analysis and Critical Control Point			45,	Equipment and 0						
(HACCP) Systems - Ongoing Requirements			46.	Sanitary Operation	is .				X	
18. Monitoring of HACCP plan.			47.	Employee Hygier	• •					
19. Verification and validation of HACCP plan.			48.	Condemned Prod	ct Con	tral				
20. Corrective action written in HACCP plan.										
21. Reassessed adequacy of the HACCP plan.			Ì	Part	F - Ins	pect	ion Requiremen	nts	ŧ.	
22. Records documenting: the written HACCP plan, monitoric critical control points, dates and times of specific event of		Х	49.	Government Staff	l ng		·			
Part C - Economic / Wholesomeness			50.	Daily Inspection (overage	9				
23. Labeling - Product Standards			51	Enforcement						
24. Labeling - Net Weights										
25. General Labeling			52.	Humane Handlinç			*****			
26. Fin. Prod Standards/Boneless (Defects/AQL/Pork Skins/	Maisture)		53.	Animal Identificat	ın .					
Part D - Sampling Generic <i>E. coli</i> Testing	Tames, etc. 32 mg/dag		54.	Ante Mortem Insp	ction	*****				
27. Written Procedures			55.	Post Mortem Insp	ction					
28. Sample Collection/Analysis										
29. Records				Part G - Other	≀egula	tory	Oversight Requ	uirements	;	
Salmonella Performance Standards - Basic Req	uirements		56.	European Commu	ity Drec	ctives				
30. Corrective Actions			57.	Monthly Review						
31. Reassessment			58.							
32. Written Assurance			59.							

- 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.

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DA	TE	3. E	ESTABLISHMENT N	1).	4. NAME OF COUNTRY	
Quickfood San Jorge, Santa Fe	5-30-2002		1014			Argentina	
San Jorge, Santa re	5. NAME OF AUDITO		OR(S)			6. TYPE OF AUDIT	
	Dr. M. Dou	glas Parl	ks				
						<u> </u>	ENT AUDIT
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Part A - Sanitation Standard Operating Procedures (S Basic Requirements		Audit Results				rt D - Continued onomic Sampling	Audit Results
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8. Records documenting implementation.			34	Species Testing			
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Part C - Economic / Wholesomeness			50.	Daily Inspection C	уегас	ge	
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24. Labeling - Net Weights							
25. General Labeling			52. —	Humane Handling			
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mois	sture)		53.	Animal Identification	n		
Part D - Sampling Generic <i>E. coli</i> Testing			54.	Ante Mortem Inspa	otion		
27. Written Procedures			55.	Post Mortem Insp:	otion		
28. Sample Collection/Analysis							
29. Records				Part G - Other I	egul	atory Oversight Requirements	
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Salmonella Performance Standards - Basic Require	ements		,u. 	Ediopean Commu		SOLIVES	<u> </u>
30. Corrective Actions			57. 	Monthly Review			<u> </u>
31. Reassessment			58.				
32. Written Assurance		5	59.	<u></u>			
					-		

- 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 other tissues without sanitizing the knife.
- 46 Over-spray at the carcass wash dropped from overhead structures, which are not cleaned an I sanitized daily, onto exposed carcasses.

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT D	ATE	3. E	STABLISHMENT N).	4. NAME OF COUNTRY	
Consignaciones Rurales Berazategui, Buenos Aires 5. NAME		1		1378		Argentina	
		5. NAME OF AUDITOR(S)			6. TYPE OF AUDIT		
	Dr. M. I	Douglas P	arks			X ON-SITE AUDIT DO	CUMENT AUDIT
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Part A - Sanitation Standard Operating Procedures (Audit	ilai ii			rt D-Continued	Audit
Basic Requirements	.,	Results				nomic Sampling	Results
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11. Maintenance and evaluation of the effectiveness of SSOP's.			37.	Import			
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Part C - Economic / Wholesomeness			50.	Daily Inspection C	verage	e	
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26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Mois	sture)		53.	Animal identification	1		
Part D - Sampling Generic <i>E. coli</i> Testing			54.	Ante Mortem Inspe	tion		
27. Written Procedures			55.	Post Mortem Inspe	tion		
28. Sample Collection/Analysis		\neg					
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Salmonella Performance Standards - Basic Require	ements		56.	European Commun	y Direc	ctives	
30. Corrective Actions			57.	Monthly Review			
31. Reassessment			58.				
32. Written Assurance			59.				
							

- 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

Figurition Care Carlos Tiglots, Riverson Alies 5.78.2.002 5. NAMEO F ALISTONS) D. M. Moogle Parks No. M. Drougle Parks No. M. Trougle Parks	1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT D	ATE	3. E	STABLISHMENT N). 4. NAME OF COUNTRY	
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- 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.

1. ESTABLI	SHMENT NAME AND LOCATION	2. AUDIT DATE		3. ESTABLISHMENT N					
Ecocarnes San Fernando, Buenos Aires		June 3, 2002		1918			Argentina		
		5. NAME OF AUDITO)		6. TYPE OF AUDIT		
Dr. M.			Douglas Parks				X ON-SITE AUDIT	DOCUMENT AUDI	
Place an	X in the Audit Results block to ind	icate non	compl	ian	ce with requ	i em	ents. Use O if not app	olicable.	
Part A - Sa	nitation Standard Operating Procedures (S Basic Requirements	SOP)	Audit Results				t D - Continued nomic Sampling	Audit Result	
7. Written S	SSOP			33	. Scheduled Samp				
8. Records	documenting implementation.			34	. Species Testing				
9. Signed a	nd dated SSOP, by on-site or overall authority.			35	. Residue				
Sanitatio	on Standard Operating Procedures (SSOP) Ongoing Requirements				Pa	: E -	Other Requirements		
10. Implem	entation of SSOP's, including monitoring of implement	tation.		36	. Export				
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	Part D - Sampling Generic <i>E. coli</i> Testing			54.	Ante Mortem Insp	ction			
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31. Reasses	sment		1	58.					
32. Written A	ssurance			59,					

- 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 department.
- 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.

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 fee al contamination, intake or bedding prior to washing the carcasses" ought to be an obligatory CC?, 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. On: 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 upor, to the final audit report of Dr. Douglas PARKS.
- * It should be stated that the traditional vacation period in our coun ry 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 cate 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