



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

NOV 15 2001

Dr. Bernardo Cane
Chief Veterinary Officer
Servicio Nacional de Sanidad y Calidad Agroalimentaria (SENASA)
Secretaria de Agricultura
Ganaderai, 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 March 27 to April 19, 2001. Argentina did not provide any comments in response to the draft final audit report. Enclosed is a copy of the final audit report.

If you have any questions regarding the audit or need additional information, please contact me at 202-720-3781. My fax number is 202-690-4040. My email address is sally.stratmoen@usda.gov.

Sincerely,

Sally Stratmoen
Acting Director
International Policy Staff
Office of Policy, Program Development
and Evaluation

Enclosure

cc:

Philip Shull, Counselor, U.S. Embassy, Buenos Aires

Jose Molina, Minister of Agricultural Affairs, Embassy of Argentina, Washington

Robert Hoff, FAS Area Officer

John Prucha, ADA, OPPDE, FSIS

Sally Stratmoen, EPS, IPS, FSIS

Karen Stuck, IEPS, IPS, FSIS

Donald Smart, Director, Review Staff, TSC

Nancy Goodwin, EPS, IPS, FSIS

Amy Winton, State Department

Country File-Argentina (Audit FY2001)

FSIS:OPPDE:IPS:EB:NGoodwin:mm:10/25/01720-9187:Argentina FY2001 final audit report to CVO

Clearance:

Sally Stratmoen, Acting Director, ES, FSIS, IPS

Initial

Date



United States
Department of
Agriculture

Food Safety
And Inspection
Service

Technical
Service
Center

Suite 300, Landmark Center
1299 Farnam Street
Omaha, NE 68102

AUDIT REPORT FOR ARGENTINA MARCH 27 THROUGH APRIL 19, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Argentina's meat inspection system from March 27 through April 19, 2001. Eight of the thirty-five establishments certified to export meat to the United States were audited. Four of these were slaughter establishments; the other four were conducting processing operations.

The last audit of the Argentinean meat inspection system was conducted in March 2000. Eight establishments were audited and all were acceptable. These were Establishments 2062, 13, 1373, 89, 249, 1378, 1921, and 1113. Sanitation Standard Operating Procedures (SSOP) and Hazard Analysis and Critical Control Point (HACCP) systems were in place and functioning properly with only minor variations observed. Testing procedures for generic *Escherichia coli* and *Salmonella* were also in place and functioning properly.

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.

During calendar year 2000, Argentinean establishments exported nearly 88 million pounds of beef to the U.S. Port-of-entry rejections were for miscellaneous defects (0.043%), contamination (0.12%), unsound (0.13%), and transportation damage and missing shipping marks (0.33% combined).

PROTOCOL

This on-site audit was conducted in five parts. One part involved visits with Argentinean national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second part entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. Establishments were selected by looking at previous audits, looking at the import records and determining the establishments with high rejects at the border, and some were selected randomly. The third part was conducted by on-site visits to establishments. The fourth part 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 generic *E. coli*. The fifth part was a visit to a farm/feedlot to look at the use of chemicals and drugs and look at their records concerning withdrawal periods before slaughter eligibility.

Program effectiveness determinations focused on 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. Argentina's inspection system was assessed by evaluating these five risk areas.

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.

RESULTS AND DISCUSSION

Summary

Based on the performance of the individual establishments, Argentina's "In-Plant Inspection System Performance" was evaluated as In-Plant System Controls In Place.

Effective inspection system controls were found to be in place in all of the eight establishments audited; two establishments (Ests. 2067 and 2062) were recommended for re-review as they were deficient in some aspects of establishment controls. Establishment 2062 deficiencies were: condensate dripping onto exposed carcasses in the cooler, pre-boning trim was not effective allowing hair and rail residues on the product on the boning table, and the moving viscera table had residues from previous use. Establishment 2067 deficiencies were: heavy condensate above exposed carcasses in the cooler, pre-boning trim was not effective allowing hair and rail residues on the product on the boning table, and residues of the previous day's uses were found on boning table, liver skinner, metal product scoops and a hopper-grinder all ready for use. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

Entrance Meeting

On March 27, an entrance meeting was held at the Buenos Aires offices of the Servicio Nacional de Sanidad y Calidad Agroalimentaria (SENASA), and was attended by Dr. Eduardo Cohen Arazi, National Director of Agrifood Inspection; Dr. Gustavo Queirolo, Director of International Relationships; Dr. Andres Schnöller, Director of Inspection of Animal Products; Dr. Oscar Lernoud, United States Export Coordinator and Dr. M. Douglas Parks, USDA International Audit Staff Officer.

Topics of discussion included the following:

1. The itinerary for audit and establishment substitutions. It was necessary to change some on-site audits due to plant closures.
2. A request was given for the country profile to be completed and brought up to date.
3. A discussion and information requested about the status and geographic areas with Foot and Mouth Disease and the quarantine areas.
4. Laboratory audits were discussed and scheduled.
5. Enforcement activities for the year past were discussed.
6. An on-site visit to a farm or feed lot was discussed and scheduled.
7. The residue-sampling program and questionnaire were discussed.
8. The exemption for species testing was discussed. I explained the delay of a decision.

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 2000. 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 of the inspection service. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOP, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- 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.

No concerns arose as a result of the examination of these documents.

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-five establishments were certified to export meat and meat products to the United States at the time this audit was conducted. Eight establishments were visited for on-site audits. In all of the eight establishments visited, both SENASA inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited, approved, and private laboratories
2. Intra-laboratory quality assurance procedures, including sample handling.
3. Methodology.

The Official SENASA Laboratory in Martinez was audited on April 17, 2001. 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. The check sample program met FSIS requirements.

Argentina's microbiological testing for *Salmonella* was being performed in approved private and government laboratories. In addition to the Official SENASA Laboratory, one of the private approved laboratories, the Xenobioticos S.R.L. in Buenos Aires was audited. The auditor determined 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 were accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.

2. The laboratories had properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses were being reported to the government or simultaneously to the government and establishment.

Farm/Feedlot Visit

Las Mercedes Feedlot
San Pedro Department
Santa Lucia, Buenos Aires (Province)

This feedlot was visited on April 11, 2001 to obtain information about drug, pesticide, disinfectant and other chemicals usage. This included products used, treatment schedules, frequency of usage, and withdrawal periods and how these are maintained. It was found that all of these activities were done according to manufacturer's recommendations. All incoming vehicles are sprayed with a viricide (Virkon-S) and personnel must walk through a footbath of this substance upon entering and leaving the premises. All facilities of the feedlot are sprayed with Virkon-S every 15 days. Records were kept of individual animals with identification to assure the withdrawal periods for drug residues were properly observed. There were discussions about these matters with the local SENASA Officials and with the private veterinarian employed by the feedlot.

Establishment Operations by Establishment Number

The following operations were being conducted in the eight establishments:

Beef slaughter and boning – two establishments (1970 and 1989)
Beef slaughter, boning and canning – one establishment (2067)
Beef slaughter, boning and cooked frozen beef – one establishment (2062)
Beef boning only – four establishments (267, 2676, 2629, and 1067)

SANITATION CONTROLS

Based on the on-site audits of establishments, Argentina's inspection system had controls in place for SSOP, according to the criteria employed in the U.S. domestic inspection program with minor variations. The variations included dirty viscera pans returned for use (Ests. 2062 and 1989); condensate above exposed product or exposed product trafficways (Ests. 2629, 1970, 2067 and 2062); poor dressing procedure and ineffective trimming at the pre-boning trim station (Ests.2067 and 2062); residues from previous day's use on equipment ready for use (Ests.2062, 2067, 1970, 1067 and 2676).

These deficiencies were all corrected immediately by inspection and company personnel.

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 audited and found to meet the basic FSIS regulatory requirements with only occasional minor variations. These variations included no preventative action recorded (Ests. 2629, 267, 1067, 1970, 1989, 2067 and 2062); the plan was not signed and dated by the person with overall authority (Ests. 1989 and 2629); operational sanitation was not addressed in the plan however it was being conducted (Ests. 267 and 2067). In all cases commitments were made by management personnel to correct these problems.

Facilities and Equipment

In Establishment 2062, condensation was dripping onto carcasses in the carcass cooler from overhead structures that were not cleaned and sanitized daily. The inspection service detained and had them moved and reconditioned immediately.

Humane Slaughter

There were multiple hits with a captive bolt pistol for stunning on the animals in Establishment 1989. There were up to three hits on over 80% of the animals. The inspection service veterinarian immediately had the company supervisor correct the situation.

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).

The HACCP programs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations. These minor variations were: in Establishment 267, there was no designated CCP, however there were limits in place; in three establishments (Ests. 267, 2067 and 2062), verification procedures were absent or only a single procedure was listed; in four establishments (Ests. 1970, 2676, 2629 and 2067), pre-shipment review was either absent or incomplete; and in two establishments (Ests. 1989 and 2067), deviations were noted in a CCP but no corrective action was taken.

Testing for Generic *E. coli*

Four of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* 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 C).

The *E. coli* testing programs were audited and found to meet the basic FSIS regulatory requirements with only occasional minor variations.

Testing for *Salmonella* Species

Four 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 program was found to meet the basic FSIS regulatory requirements with only occasional minor variations. These variations included: in Establishment 2067, the bin of ground beef for sampling was not selected randomly and the product sampled was trimmings and not ground beef; and in Establishment 2062, the ground beef being sampled was not selected randomly.

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. This includes visual examination of all feet and lips of all slaughtered animals at the time of slaughter for signs of Foot and Mouth Disease.

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

There have been severe outbreaks of Foot and Mouth Disease in Argentina in several provinces since the last audit. There have been nearly 300 outbreaks but they have been slowing since March 2001. These provinces or states are as follows:

Buenos Aires
La Pampa
Cordoba
San Luis
Entre Rios

Vaccinations have been undertaken in these states at the present time. This is a killed vaccine. Field samples are periodically being sent to the United States APHIS laboratory at Plum Island for confirmation and the type is 01 Campo. These outbreaks have resulted in the closure and/or severe cutback in operations in several export establishments.

RESIDUE CONTROLS

Argentina's National Residue Testing Plan for 2001 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 control in the slaughter and processing departments except for minor variations. These variations included: in Establishment 1970, all inspection legend brands were illegible; and in Establishments 2067 and 2062, dressing procedures were not adequate to prevent the presence of all foreign material on the carcasses, and pre-boning trim was not effective resulting in product on the boning table with foreign material present (this material was hair, grease and metal particles from the conveyor rail). These variations were corrected by the inspection and company personnel.

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 [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, 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 countries 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.

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. Andres Schnöller is in charge of the slaughter and processing establishments, Dr. Eduardo Cohen Arazi in charge of the Agrifood inspection, and Dr. Oscar Lernoud is the 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. Cohen Arazi and Schnöller for evaluation; they formulate a plan for corrective actions and preventive measures.

Enforcement Activities

Compliance and enforcement activities during the year 2000 for violations of the standards regulating the health and quality of products, by-products and derivatives of animal origin are detailed below.

Rulings were issued on two hundred and fifty-nine (259) cases involving violations of Decree 4238/88 which establishes the set of standards to which nationally qualified plants devoted to preparing animal origin products by-products, and derivatives. This Agency (SENASA) applied the sanctions envisioned in Decree 1685/96 and its modification, which consist of warning, fines of up to one million pesos, suspension for up to a year, cancellation of registration, temporary or final plant closure and confiscation of product, by-products and /or things related to the violation that was committed in these cases. In compliance with the National Plan for the Health and Hygiene Control of Chemical Wastes in Animal-Origin Products, By-Products and Derivatives intended for products of human consumption, created through Resolution 215 of SENASA, rulings were issued in thirty-five (35) cases. Likewise, the measures to suspend registration, authorization, permit certification and/or provision of service contemplated in Resolution 709 of the Secretary of Agriculture, Livestock, Fishing and Food were applied to those persons who for any reason had debts to this National Office until such time as they corrected the situation.

Exit Meeting

An exit meeting was conducted in Buenos Aires on April 19, 2001. The Argentinean participants were: Dr. Alfredo Bigatti, SENASA Vice President; Dr. Eduardo Cohen Arazi, National Director of Agrifood Inspection; Dr. Andres Schnöller, Director of Inspection of Animal Products; Dr. Oscar Lernoud, United States Export Coordinator; Dr. Jorge Rodríguez Toledo, Animal Laboratory Director; Dr. Aldo Combessies, Laboratory Director; Dr. Guillermo Coll, Pampas Area Director; Lic. Gustavo Queiroló, International Relationship; Dr. Roxana Blasetti, International Relationship Coordinator and Dr. M. Douglas Parks, USDA International Audit Staff Officer.

The following topics were discussed:

1. Ratings of establishments and deficiencies. The deficiencies were discussed in depth. They were: (a) Humane stunning and the need to have well trained personnel in this position and the importance of careful and accurate placement of the stun gun. Inspection officials were quick and with emphasis to assure that this matter had been addressed in the establishment where the variation occurred and would be monitored closely in the future, and (b) In Establishment 2062, condensation was observed dripping onto exposed carcasses in the cooler, the pre-boning trim was not effective allowing hair and rail residues on the product on the boning table and the moving viscera table was coming up with residues from the previous use. In Establishment 2067, heavy condensation was observed above exposed carcasses in the cooler, pre-boning trim was not effective allowing hair and rail residues on the product on the boning table and residues of previous day's uses were observed on the boning table, liver skinner, metal product scoops and a hopper-grinder all ready for use. Assurances were given by inspection officials that these situations had been corrected and would be monitored closely in the future.
2. Compliance and enforcement. We discussed the fact that people convicted of a felony meat violation would be allowed to reenter the meat business when their debt to society had been paid (fine or incarceration).
3. Animal diseases. FMD was discussed with reference to geography of the outbreaks, vaccination, quarantine areas, plant closures and future actions.
4. Laboratories. The audit results, procedures, and where *Salmonella* testing is conducted.
5. Farm/feedlot audit. Audit results revealed a minor variation in the records of accurate animal treatment dates. Commitments were made by the inspection officials to assure that these dates would be accurate in the future.
6. Species testing. The Argentinean officials are awaiting permission to stop the testing.
7. The current residue questionnaire was discussed and given to the auditor.

CONCLUSION

The inspection system of Argentina was found to have effective 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. Eight establishments were audited: six were acceptable, and two were evaluated as acceptable/re-review. 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

(signed) Dr. M Douglas Parks

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 form
- F. Individual Foreign Establishment Audit Forms
- G. Written Foreign Country's Response to the Draft Final Audit Report (no comments received)

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
267	√	√	no	√	√	√	√	√
1970	√	√	√	√	√	√	√	√
1989	√	√	√	√	√	√	√	no
2676	√	√	√	√	√	√	√	√
2629	√	√	√	√	√	√	√	no
2067	√	√	no	√	√	√	√	√
1067	√	√	√	√	√	√	√	√
2062	√	√	√	√	√	√	√	√

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

152	√	√	√	√	√	√	√	√
391	√	√	√	√	√	√	√	√
1014	√	√	√	√	√	√	√	√
1113	√	√	√	√	√	√	√	√
1122	√	√	√	no	√	√	√	√
1237	√	√	√	√	√	√	√	no
1373	√	√	√	√	√	√	√	√
1399	√	√	√	√	√	√	√	√
2035	√	√	√	√	√	√	√	√
2064	√	√	√	√	√	√	√	√
2065	√	√	√	√	√	√	√	√
2082	√	√	√	√	√	√	√	√

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. 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 had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. 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.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. *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.*
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10. Adequate verific. procedures	11. Adequate documentation	12. Dated and signed
267	√	√	√	√	√	no	√	√	√	no	√	√
1970	√	√	√	√	√	√	√	√	√	√	√	√
1989	√	√	√	√	√	√	√	√	√	√	√	√
2676	√	√	√	√	√	√	√	√	√	√	√	√
2629	√	√	√	√	√	√	√	√	√	√	√	√
2067	√	√	√	√	√	√	√	no	√	no	√	√
1067	√	√	√	√	√	√	√	√	√	√	√	√
2062	√	√	√	√	√	√	√	√	√	no	√	√

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

152	√	√	√	√	√	√	√	√	√	no	√	√
391	√	√	√	√	√	√	√	no	√	√	√	√
1014	√	√	√	√	√	√	no	no	√	√	√	√
1113	√	√	√	√	√	√	√	√	√	√	√	√
1122	√	√	√	√	√	√	√	no	√	√	√	no
1237	√	√	√	√	√	√	√	√	√	√	√	√
1373	√	√	√	√	√	√	√	√	√	√	no	√
1399	√	√	√	√	√	√	√	√	√	√	√	√
2035	√	√	√	√	√	√	√	√	√	√	√	√
2064	√	√	√	√	√	√	√	no	√	√	√	no
2065	√	√	√	√	√	√	√	√	no	√	√	√
2082	√	√	√	√	√	√	√	no	√	√	no	√

Data Collection Instrument for Generic *E. coli* Testing

Each establishment 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 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. Predominant 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
267	N/A									
1970	√	√	no	√	√	√	√	√	√	√
1989	√	√	√	√	√	√	√	√	√	√
2676	N/A									
2629	N/A									
2067	√	no	√	√	√	√	√	√	√	√
1067	N/A									
2062	√	√	√	√	√	√	√	√	√	√

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

152	N/A									
391	N/A									
1014	√	no	√	√	√	√	√	√	√	√
1113	√	√	√	√	√	√	√	√	√	√
1122	N/A									
1237	N/A									
1373	√	√	√	√	√	√	√	√	√	√
1399	√	√	√	√	√	√	√	√	√	√
2035	√	√	√	√	√	√	√	√	√	√
2064	√	√	√	√	√	√	√	√	√	√
2065	√	√	√	√	√	√	√	√	√	√
2082	Not	Rved								

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
267	N/A					
1970	√	√	N/A	√	√	√
1989	√	√	N/A	√	√	√
2676	N/A					
2629	N/A					
2067	√	√	no	√	no	√
1067	N/A					
2062	√	√	√	no	√	√

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

152	N/A					
391	N/A					
1014	√	√	√	√	√	√
1113	√	√	N/A	√	√	√
1122	N/A					
1237	N/A					
1373	√	√	√	√	√	√
1399	√	√	N/A	√	√	√
2035	√	√	N/A	√	√	√
2064	√	√	N/A	√	√	√
2065	√	√	N/A	√	√	√
2082	Not	Revd				

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

REVIEW DATE
 April 17, 2001

NAME OF FOREIGN LABORATORY
 SENASA Official Laboratory

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 SENASA

CITY & COUNTRY
 Buenos Aires, Argentina

ADDRESS OF LABORATORY
 1653 Fleming Ave.
 Martinez, Buenos Aires Province

NAME OF REVIEWER
 Dr. M. Douglas Parks

NAME OF FOREIGN OFFICIAL
 Dr. Jorge Rodriguez Toledo

Residue Code/Name		100	111	200	300	400	500	800	902	203	Spp	Ecol	Salm	
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE											
	Sample Handling	01		A	A	A	A	A	A	A	A	A	A	A
	Sampling Frequency	02		A	A	A	A	A	A	A	A	A	A	A
	Timely Analyses	03		A	A	A	A	A	A	A	A	A	A	A
	Compositing Procedure	04		A	A	A	A	A	A	A	A	O	O	O
	Interpret Comp Data	05		A	A	A	A	A	A	A	A	O	O	O
Data Reporting	06	A	A	A	A	A	A	A	A	A	A	A		
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A	A	A	A	
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A	A	A	A	
	Equipment Operation	09	A	A	A	A	A	A	A	A	A	A	A	
	Instrument Printouts	10	A	A	A	A	A	A	A	A	A	A	A	
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A	A	A	A	A	A	
	Recovery Frequency	12	A	A	A	A	A	A	A	A	O	O	O	
	Percent Recovery	13	A	A	A	A	A	A	A	A	O	O	O	
	Check Sample Frequency	14	A	A	A	A	A	A	A	A	A	A	A	
	All analyst w/Check Samples	15	A	A	A	A	A	A	A	A	A	A	A	
	Corrective Actions	16	A	A	A	A	A	A	A	A	A	A	A	
International Check Samples	17	A	A	A	A	A	A	A	A	A	A	A		
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE	O	O	O	O	O	O	O	A	A	A	
OTHER REVIEW		19	EVAL. CODE											
		20	EVAL. CODE											

SIGNATURE OF REVIEWER

M. Douglas Parks Dr

DATE

April 17, 2001

FOREIGN COUNTRY LABORATORY REVIEW <i>(Comment Sheet)</i>		REVIEW DATE April 17, 2001	NAME OF FOREIGN LABORATORY SENASA Official Laboratory
FOREIGN GOV'T AGENCY SENASA		CITY & COUNTRY Buenos Aires, Argentina	ADDRESS OF LABORATORY 1653 Fleming Ave. Martinez, Buenos Aires Province
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Jorge Rodriguez Toledo	
RESIDUE CODES	ITEM NO.	COMMENTS	
		<i>stock solution vials are not all fully labeled</i>	

FOREIGN COUNTRY LABORATORY REVIEW

April 18, 2001

Xenobiotics S.R.L.

FOREIGN GOV'T AGENCY
 SENASA Private Contract Laboratory

CITY & COUNTRY
 Buenos Aires, Argentina

ADDRESS OF LABORATORY
 2627 Albarellos
 Buenos Aires Province

NAME OF REVIEWER
 Dr. M. Douglas Parks

NAME OF FOREIGN OFFICIAL
 Dr. Hector Mugica

Residue Code/Name		100	200	300	400	500	600	700	800	900			
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	A	A	A	A	A	A	A	A	A		
	Interpret Comp Data	05	A	A	A	A	A	A	A	A	A		
Data Reporting	06	A	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	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	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	0	0	0	0	0	0	0	0	0		
OTHER REVIEW		19											
		20											

SIGNATURE OF REVIEWER

M. Douglas Parks

DATE

April 17, 2001

FOREIGN COUNTRY LABORATORY REVIEW <i>(Comment Sheet)</i>		REVIEW DATE April 18, 2001	NAME OF FOREIGN LABORATORY Xenobiotics S.R.L.
FOREIGN GOV'T AGENCY SENASA Private Contract Laboratory		CITY & COUNTRY Buenos Aires, Argentina	ADDRESS OF LABORATORY 2627 Albarellos Buenos Aires Province
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Hector Mugica	
RESIDUE CODES	ITEM NO.	COMMENTS	

FOREIGN PLANT REVIEW FORM

REVIEW DATE: April 10, 2001
ESTABLISHMENT NO. AND NAME: Mirab S.A. Est 1067

CITY: Pilar
COUNTRY: Argentina

NAME OF REVIEWER
Dr. M. Douglas Parks

NAME OF FOREIGN OFFICIAL
Dr. Oscar Lemoud

EVALUATION
 Acceptable Acceptable/ Re-review Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 M	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 M	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE April 10, 2001	ESTABLISHMENT NO. AND NAME Mirab S.A. Est 1067	CITY Pilar
			COUNTRY Argentina
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Oscar Lernoud		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

SSOP--No preventative action recorded.

HACCP--The CCP on humidity is not clearly stated.

19--The racks for exposed product in the cooker are not cleaned daily only weekly.

30--Very dirty wooden pallets are touching product with only primary packaging and subsequently the exposed product comes in contact with this packaging material.

19--Several exposed product slicers ready for use had residues from previous day's use on product contact surfaces.

FOREIGN PLANT REVIEW FORM

REVIEW DATE
April 4,
2001

ESTABLISHMENT NO. AND NAME
Friar S.A. Est 1970

CITY
Reconquista
COUNTRY
Argentina

NAME OF REVIEWER
Dr. M. Douglas Parks

NAME OF FOREIGN OFFICIAL
Dr. Oscar Lernoud

EVALUATION

Acceptable Acceptable/
Re-review Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 M	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 U	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 M	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 M	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 M	Residue program compliance	46 A	Single standard	75 A
Other product areas (<i>inside</i>)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	April 4, 2001	Friar S.A. Est 1970	Reconquista
			COUNTRY
			Argentina
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL		EVALUATION
Dr. M. Douglas Parks	Dr. Oscar Lernoud		<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

SSOP--No preventative action recorded.

HACCP--Chlorine content in water is CCP, but had no upper limits designated.

HACCP--No annual reassessment of program.

HACCP--No preshipment review.

E. coli testing--plant location for sampling not in plan.

17--Several areas of heavy condensation above exposed carcasses in the coolers.

18--Residues of previous day's operations on non-product contact surfaces of exposed product scales that are located on an exposed product table ready for use.

19--The wiper blade on an exposed product moving conveyor , ready for use, had residues from the previous day's operation.

28--One of ten packages of product contained a particle of rail residues.

30--All inspection legend brands on the carcasses were illegible.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		April 5, 2001	Fricoop S.A. Est 1989		Rosario
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Oscar Lernoud		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 U	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 M	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	April 5, 2001	Fricoop S.A. Est 1989	Rosario
			COUNTRY
			Argentina
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. M. Douglas Parks	Dr. Oscar Lernoud	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

SSOP--The plan is not signed by person with overall authority.

SSOP--No preventative action recorded.

HACCP--Incorrect limits set for CCPI.

HACCP--Deviations of the CCP were noted in the records but no corrective action was recorded.

40--A high percentage(over 80%) of heads show multiple hits with a captured bolt pistol as the stunner.

19--The moving visera table was coming up for use with residues of previous uses.

18--Water overspray was dripping back on the exposed heads from the overhead conveyer rail.

FOREIGN PLANT REVIEW FORM

REVIEW DATE
**April 16,
2001**

ESTABLISHMENT NO. AND NAME
Fco. Finexcor Est 2062

CITY
Bernal
COUNTRY
Argentina

NAME OF REVIEWER
Dr. M. Douglas Parks

NAME OF FOREIGN OFFICIAL
Dr. Oscar Lernoud

EVALUATION
 Acceptable Acceptable/ Re-review Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	65 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	66 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	67 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	68 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	69 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	06 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	36 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	08 A	2. DISEASE CONTROL		Filling procedures	66 A
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 A
Facilities approval	16 A	Postmortem dispositions	42 A	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 U	Returned and rework product	46 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 U	Residue program compliance	48 A	Single standard	76 A
Other product areas (<i>inside</i>)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	60 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	61 U	Imports	81 O
Personal dress and habits	26 A	Boneless meat reinspection	62 A		
Personal hygiene practices	26 A	Ingredients identification	63 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	64 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE April 16, 2001	ESTABLISHMENT NO. AND NAME Fco. Finexcor Est 2062	CITY Bernal
			COUNTRY Argentina
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Oscar Lernoud		EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

SSOP—No preventative action recorded.

HACCP—only one method of verification listed, not multiple.

Salmonella testing—The testing of Salmonella is done in their own on-premise Senasa approved laboratory and not sent to another official laboratory as required.

Salmonella testing—Ground product is not selected randomly.

17—Condensate was dripping onto exposed carcasses in the cooler.

51—Pre-boning trim was not effective allowing hair and rail residue on the product on the boning table.

19—The wiper on an exposed product moving conveyor, ready for use, had residues from the previous day's use.

19—The moving visera table in the slaughter department was coming up for use with residues from the previous use.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY	
FOREIGN PLANT REVIEW FORM		April 9, 2001	CEPA S.A. Est 2067		Pontevedra	
					COUNTRY Argentina	
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Oscar Lernoud		EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable		
CODES (Give an appropriate code for each review item listed below)						
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply						
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation		32 A	Special label claims	59 A
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records	63 A
Pest control program	08 A	Waste disposal		36 A	Empty can inspection	64 A
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures	65 A
Temperature control	10 A	Animal identification		37 A	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures		38 A	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions		39 A	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter		40 A	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures		41 A	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions		42 A	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification	72 A
Over-product ceilings	17 M	Returned and rework product		45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates	74 A
Product contact equipment	19 U	Residue program compliance		46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures		47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.		49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 U	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection		52 A		
Personal hygiene practices	26 A	Ingredients identification		53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients		54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	April 9, 2001	CEPA S.A. Est 2067	Pontevedra
			COUNTRY
			Argentina
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. M. Douglas Parks	Dr. Oscar Lernoud	<input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

SSOP--Operational sanitation does not reference clean up at break-time and it is being done.

SSOP--No preventative action recorded.

HACCP--Calibration of the thermometer not listed as a verification method.

HACCP--No signature of overall authority.

HACCP--Boning room temperature above limit in records but no action taken.

HACCP--Preshipment review is incomplete. It does not address all of HACCP.

E. coli testing--The procedure does not designate the employee responsible to collect the sample.

Salmonella testing--The bin of ground beef for sampling is not selected randomly.

Salmonella testing--The sampling is done on trimmings not ground product.

08--Poison baits for rodent control are located within the establishment.

17--Heavy condensation was above exposed carcasses in the cooler and exposed product trafficways.

51--Pre-boning trim was ineffective, allowing foreign material(hair and rail dirt) on product on the boning table.

19--Residues of previous day's use was found on lift-up panels on the boning table, the liver skinner, metal product scoops, and a hopper-grinder all ready for use.

FOREIGN PLANT REVIEW FORM

REVIEW DATE

April 6,
2001

ESTABLISHMENT NO. AND NAME

Coto Centro Integral de Comercialization Est 2629

CITY

Buenos Aires

COUNTRY

Argentina

NAME OF REVIEWER
Dr. M. Douglas Parks

NAME OF FOREIGN OFFICIAL
Dr. Oscar Lernoud

EVALUATION

Acceptable Acceptable/
Re-review Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations	66 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials	68 A
Water potability records	01 A	Product handling and storage		30 M	Laboratory confirmation	67 A
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals	68 O
Back siphonage prevention	03 A	Product transportation		32 A	Special label claims	69 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring	60 O
Sanitizers	06 A	Effective maintenance program		33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records	63 O
Pest control program	08 A	Waste disposal		36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures	65 O
Temperature control	10 A	Animal identification		37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures		38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions		39 O	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter		40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures		41 O	Process. defect actions -- plant	70 O
Facilities approval	16 A	Postmortem dispositions		42 O	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification	72 A
Over-product ceilings	17 M	Returned and rework product		45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates	74 A
Product contact equipment	19 A	Residue program compliance		46 A	Single standard	76 A
Other product areas (inside)	20 A	Sampling procedures		47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.		49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals		60 A	Species verification	78 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		61 A	Imports	81 O
Personal dress and habits	26 A	Boneless meat reinspection		62 A		
Personal hygiene practices	26 A	Ingredients identification		63 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients		64 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE April 6, 2001	ESTABLISHMENT NO. AND NAME Coto Centro Integral de Comercialization Est 2629	CITY Buenos Aires
			COUNTRY Argentina
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Oscar Lernoud		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

SSOP—Plan not signed and dated by overall authority.

SSOP—No preventative action recorded.

HACCP—No preshipment review is being done.

17—Heavy condensation above exposed carcasses in the cooler.

30—One package in ten had foreign material in the package, it was residues from the rail.

FOREIGN PLANT REVIEW FORM

REVIEW DATE April 3, 2001	ESTABLISHMENT NO. AND NAME Friar S.A. Est 267	CITY Desvio Arijon
		COUNTRY Argentina

NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Oscar Lernoud	EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable
---	--	---

CODES (Give an appropriate code for each review item listed below)
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas (<i>inside</i>)	20 A	Sampling procedures	47 O	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 O
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	April 3, 2001	Friar S.A. Est 267	Desvio Arijon
			COUNTRY
			Argentina
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. M. Douglas Parks	Dr. Oscar Lernoud	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

SSOP--No written procedures for operational sanitation, but operational sanitation is being done.

SSOP--No preventative action is being recorded.

HACCP--No designated CCP in the plan however limits are in place.

HACCP--No verification procedures are listed.

FOREIGN PLANT REVIEW FORM

REVIEW DATE
April 6,
2001

ESTABLISHMENT NO. AND NAME
F. Macellarius S.A. Est 2676

CITY
Ciudad Evita
COUNTRY
Argentina

NAME OF REVIEWER
Dr. M. Douglas Parks

NAME OF FOREIGN OFFICIAL
Dr. Oscar Lernoud

EVALUATION
 Acceptable Acceptable/
Re-review Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 U	Residue program compliance	46 O	Single standard	75 A
Other product areas (<i>inside</i>)	20 A	Sampling procedures	47 O	Inspection supervision	76 A
Dry storage areas	21 M	Residue reporting procedures	48 O	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FCREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	April 6, 2001	F. Macellarius S.A. Est 2676	Ciudad Evita
			COUNTRY
			Argentina
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION	
Dr. M. Douglas Parks	Dr. Oscar Lernoud	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

HACCP--Upper limit for CCP is too high. It violates Argentina law which is 7 degrees and is set at 10 degrees.

HACCP--No preventative action is recorded.

HACCP--No preshipment review is being done.

26--Water in the hand wash sink is much too hot for use.

19--Hand use equipment is washed in the hand wash sink, no sink available for equipment wash.

19--The lift up panels of the boning table had residues of previous day's use.

19--The wiper blade on an exposed product moving conveyor, ready for use, had residues from the previous day's use.

Country Response Not Received