



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

MAR 15 2010

Dr. Jorge Amaya  
Servicio Nacional de Sanidad y Calidad Agroalimentaria  
Secretaria de Agricultura, Ganaderia, Pesca y Alimentación  
Paseo Colon 367-Piso 9  
1063 Buenos Aires  
Argentina

Dear Dr. Amaya:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Argentina's meat inspection system July 15 to August 18, 2009. Comments received from the government of Argentina have been included as an attachment to the final report. Enclosed is a copy of the final audit report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 205-3969, by facsimile at (202) 720-0676, or electronic mail at [james.adams5@fsis.usda.gov](mailto:james.adams5@fsis.usda.gov).

Sincerely,

James Adams, DVM  
Director  
International Audit Staff  
Office of International Affairs

Enclosure

CC list for letters:

David Mergen, Agricultural Counselor, US Embassy, Buenos Aires

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David Smith, IES, OIA

Country File

MAR 15 2010

FINAL REPORT OF AN AUDIT CARRIED OUT IN  
ARGENTINA COVERING ARGENTINA'S MEAT  
INSPECTION SYSTEM

JULY 15 THROUGH AUGUST 18, 2009

Food Safety and Inspection Service  
United States Department of Agriculture

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## ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority: National Service for Animal Health and Agro-Food Quality ( <i>Servicio Nacional de Sanidad y Calidad Agroalimentaria</i> ) SENASA
DFPOA	Directorate for Products of Animal Origin and Inspection ( <i>Direccion Fiscalizacion de Productos de Origen Animal</i> )
DNFA	National Directorate for Inspection of Foods and Agricultural Products ( <i>Dirreccion Nacional de Fiscalizacion Agroalimentaria</i> )
<i>E. coli</i>	Generic <i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
NOID	Notice of Intent to Delist
PR/HACCP	Pathogen Reduction/ Hazard Analysis and Critical Control Point Systems
SENASA	National Service for Animal Health and Agro-Food Quality ( <i>Servicio Nacional de Sanidad y Calidad Agroalimentaria</i> )
SRM	Specified Risk Material
SSOP	Sanitation Standard Operating Procedures
<i>Salmonella</i>	<i>Salmonella</i> species
VIC	Veterinarian-In-Charge

## 1. SUMMARY

### 1.1 Description/Eligibility

This report summarizes the outcome of the audit conducted in Argentina from July 15 through August 18, 2009. This was a routine audit. Argentina is eligible to export meat products to the United States. At the time of the audit, thirty one establishments were eligible to export to the U.S. Between January 1, 2008 and December 31, 2008, Argentina exported 33,107,830 pounds of meat products to the U.S. and between January 1 and June 30, 2009 Argentina exported 1,649,458 pounds of beef products to the U.S.; there were no rejections for any food-safety concerns. Activities of the current audit appear in the table below.

The findings of the previous audit conducted September 5 through October 2, 2008 resulted in no restrictions of any Argentinean establishment's ability to export meat products to the US.

### 1.2 Comparison of the Current Audit and the Previous Audit

		07/15-08/18, 2009	09/5-10/02, 2008
<b>Levels of Government Oversight Audited</b>			
	Headquarters	1	1
	Regional	2	1
	Establishment Level	11	11
<b>Laboratories Audited</b>			
	Microbiology	1	1
	Residue	1	1
<b>Establishments Audited</b>			
	Slaughter/processing	9	6
	Fabrication	1	4
	Cold Storage	1	1
<b>Enforcement Actions Initiated</b>			
	NOID	0	1
	Delistment	0	0
<b>Risk Area Findings</b>			
	Sanitation Controls (SSOP, SPS)	15	12
	Animal Disease Controls	0	0
	Slaughter/Processing (PR/HACCP)	3	15
	Residue Controls	0	0
	Microbiology Controls	0	0
	Inspection/Enforcement Controls	8	9

### 1.3 Summary Comments for the Current Audit

The results of this audit reflected a decrease in the total number of audit findings over the previous audit. The increase in deficiencies noted was observed in Sanitation Standard Operating Procedure (SSOP) and Sanitation Performance Standards (SPS). Although

some FSIS requirements were not enforced in eight of the eleven establishments audited, the review of the government oversight of Argentina's meat inspection system at the central, regional and local (establishment) offices demonstrated that inspection system controls were in place. Findings from the previous audit were determined to be corrected.

## 2. INTRODUCTION

The audit took place in Argentina from July 15 through August 18, 2009.

An opening meeting was held on July 16 in Buenos Aires with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the details of the audit itinerary, explained the purpose and use of Self-Reporting-Tool (SRT) and requested additional information needed to complete the audit of Argentina's meat inspection system.

The auditor was accompanied during the entire audit by representatives of National Service for Animal Health and Agro-Food Quality (*Servicio Nacional de Sanidad y Calidad Agroalimentaria*) and its Division Directorate for Products of Animal Origin and Inspection (*Dirección Fiscalización de Productos de Origen Animal*) and when appropriate, representatives from the local inspection offices.

## 3. OBJECTIVE OF THE AUDIT

This was a routine annual audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter/processing establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the Senior Program Auditor visited the following sites: the headquarters of the CCA, the two laboratories performing analytical testing on United States-destined product, and the two slaughter/processing establishments eligible to export to the US.

The findings of the previous audit during September 2008 resulted in no restrictions of any Argentina establishment's ability to export beef to the United States.

## 4. PROTOCOL

The official on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in Argentina's inspection headquarters offices. The third part involved on-site visits to the nine beef slaughter/processing, one fabrication and one cold storage establishments certified by Argentina as eligible to export to the United States. The fourth part involved visits to two private laboratories; MERCOLAB was conducting microbiological analyses of field samples in Santa Fe, and Laboratorio Litoral in Rosario was conducting residue analyses of field samples.

Program effectiveness determinations of Argentina's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP); (2) animal disease controls; (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis/Critical Control Point (HACCP) programs and the testing program for generic *E. coli*; (4) residue controls; 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. The auditor also assessed how inspection services are carried out by Argentina and determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

In the opening meeting, the auditor explained that Argentina's inspection system would be audited in accordance with two areas of focus. First, the auditor would audit against FSIS requirements. These include daily inspection in all certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, species verification testing, and FSIS' requirements for HACCP, SSOP, SPS, testing for generic *E. coli* and *Salmonella* species. Second, the auditor would audit against any equivalence determinations that have been made by FSIS for Argentina under provisions of the Sanitary/Phytosanitary Agreement.

The following special equivalence determinations have been made by FSIS for Argentina:

- Residue Control System equivalent as of 05/17/04.
- VIDAS *Listeria monocytogenes* 11 (LMO2) Method for Ready-to-Eat Foods equivalent as of 02/08/08.
- VIDAS *Listeria monocytogenes* (LIS) Method for Ready-to-Eat Foods equivalent as of 02/08/08.
- VIDAS *Listeria* Species Xpress (LSX) Method for Ready-to-Eat Foods equivalent as of 02/08/08.
- VIDAS *Salmonella* (SLM) Method equivalent as of 02/08/08. Enzyme-linked Immunosorbent Assay (ELFA)
- VIDAS *Salmonella* (ICS) and Selective Plate (HE BS, SMID) Method (Raw)
- VIDAS *Salmonella* (ICS) and Selective Plate (HE BS, XLD) Method (Raw)
- VIDAS *Salmonella* (ICS) and Selective Plate (HE BS, SMID) Method (Raw)
- VIDAS *Salmonella* (SLM) Method (Raw)

## 5. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.) and
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the Pathogen Reduction/HACCP regulations.

## 6. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at:

[http://www.fsis.usda.gov/Regulations & Policies/ Foreign Audit Reports/index.asp](http://www.fsis.usda.gov/Regulations%20&%20Policies/Foreign%20Audit%20Reports/index.asp).

The last two FSIS audits of Argentina's inspection system were conducted in July/August 2007 and September/October 2008.

The following deficiencies were identified during the audit in July/August 2007:

- SSOP deficiencies were found in four of the six establishments audited, primarily in implementation, maintenance, and recordkeeping.
- SPS deficiencies were found in five of the six establishments audited. These deficiencies were found in building maintenance, pest control, equipment and utensils, and ventilation.
- HACCP – implementation deficiencies were found all of the six establishments audited, primarily in verification, corrective actions, and recordkeeping.

The following deficiencies were identified during the audit in September/October 2008:

- The SENASA inspector assigned to kidney inspection was not inspecting some of the presented kidney in one of the eleven establishments audited.
- Six of the eleven establishments audited had deficiencies reported in SSOP, primarily in implementation and recordkeeping.
- Six of the eleven establishments audited had deficiencies reported in SPS. These included ventilation, light intensity, equipment and utensils, and sanitary operations.
- One of eleven establishments had a deficiency reported in Basic HACCP. All ten establishments had deficiencies reported in HACCP implementation,

primarily in the areas of monitoring, verification, corrective actions/preventive measures, and recordkeeping.

- One of the eleven establishment, humane handling records of SENASA showed at least one observation per week for the several weeks that there was a palpebral reflex present on at least one of the 5-10 cattle observed per day.
- In one of eleven establishments, the auditor and SENASA officials watched the stunning of five animals. The equipment being used was a pneumatic captive-bolt stunner. The first animal required two applications of the stunner, the second, third and fourth animals received one application. The fifth animal required three applications.
- Two of the six establishments audited had deficiencies in the selection of carcasses for sampling for generic *E. coli* and/or in their records of sampling, analysis, and results.
- Some in-plant SENASA inspection personnel were not fully aware of the content of the SSOP and HACCP plans of the establishments.

## 7. MAIN FINDINGS

### 7.1 Government Oversight

There were no major changes in the CCA organizational structure since the last FSIS audit. The implementation of the Regional concept for the more direct supervision of the establishments producing agricultural products had been completed. All fourteen Regions were operational. The Buenos Aires Metropolitan area had direct supervision from CCA of the establishments in the Metropolitan area. Each Region had Thematic Coordinators which indirectly supervise in-plant SENASA personnel. The Regional Directors report to a Regional Coordinator in Headquarters in Buenos Aires. The National Service of Animal Health and Agro-Food Quality (*Servicio Nacional de Sanidad y Calidad Agroalimentaria- SENASA*) has the responsibility for carrying out Argentina's meat inspection program including oversight and enforcement of the FSIS regulatory requirements in establishments certified to export to the United States.

#### 7.1.1 Ultimate Control and Supervision

There is a daily communication between HQ and Region, and HQ audits Regional offices once a year. Periodic Supervisory Reviews are performed monthly by the Region, and there is a daily supervision of the IIC of the Local inspection service. Official government veterinarian can not have any commercial connections with establishment officials according the Argentinean Regulation 42/38/68, Chapter 8.

#### 7.1.2 Assignment of Competent, Qualified Inspectors

Approximately 75 veterinarians and 300 meat inspectors provided direct meat inspection service to those establishments that produce or store US products. All official veterinarians and meat inspectors employed by Argentina's meat inspection program possessed the required educational degree necessary to meet minimum qualifications. These inspection personnel went through introductory training as well as participation in on-the-job training under the supervision of experienced veterinarians. Continual training was provided for all inspection personnel as needed. The regional offices maintained individual training records of inspection personnel.

The training programs given in 2008 and 2009 included courses given in Buenos Aires and colleges and universities. Course topics included various types of computer training, animal diseases and animal health, administration, leadership, and management, epidemiology, microbiology, immunology, virology, inspection basics, Good Manufacturing Practices and Standard Operating Procedures, ante-mortem and post-mortem examination, HACCP, the national residue program, food borne diseases, Bovine Spongiform Encephalopathy and traceability.

#### 7.1.3 Authority and Responsibility to Enforce the Laws

SENASA has the legal authority and the responsibility to enforce US requirements

#### 7.1.4 Adequate Administrative and Technical Support

SENASA has adequate administrative and technical support to operate its meat inspection program.

### 7.2 Headquarters Audits

The auditor conducted a review of inspection system documents at the headquarters of the inspection service and in the headquarters office. The records review focused primarily on food safety hazards and included the following:

- Methods of payment to inspection personnel.
- Proper distribution of relevant legislation to inspection personnel.
- Process of hiring, qualification and assignment of inspection personnel to the US certified establishments.
- Internal review reports.
- Other supervisory visits to establishments that were certified to export to the US.
- New laws and implementation of documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Sampling and laboratory analyses for microbiology.
- Humane slaughter.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as cysticercosis.
- Control of inedible and condemned materials.
- Export product inspection and control including export certificates.

- Enforcement records, including examples of criminal prosecution and seizure and control of noncompliant product.

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

## 8. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of nine slaughter/processing, one processing and one cold storage establishments that have been certified by SENASA as eligible to export to the US. None was delisted or was issued a NOID by Argentina inspection service because of failure to meet basic US requirements.

## 9. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis is placed on the application of procedures and standards that are equivalent to United States' requirements.

Residue laboratory audits focus on sample handling, sampling frequency, timely analysis, data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test United States samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements. (Several private laboratories were used in Argentina for analyses of generic *E. coli*.)

The following laboratory was audited:

The Laboratorio Litoral, a private residue and microbiology laboratory in Rosario.

The private microbiology laboratory, Mercolab in Santa Fe.

There were no findings in both of these laboratories. The function of these laboratories will be discussed in Section 11.3 (Testing for generic *E. coli*), 12 (RESIDUE CONTROLS), and 13.2 (Testing for *Salmonella* species and *E. coli* O157:H7) of this report.

## 10. SANITATION CONTROLS

As stated earlier, the FSIS auditor focused on five areas of risk to assess Argentina's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of establishments, Argentina's inspection system had controls in place for SSOP programs, good personal hygiene practices, and good product handling and storage practices.

In addition, Argentina's inspection system had controls in place for water potability records, chlorination procedures, back-siphonage prevention, separation of operations, temperature control, work space, ventilation, ante-mortem facilities, welfare facilities, and outside premises.

#### 10.1 Sanitation Standard Operating Procedures

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the US domestic inspection program. The SSOP in seven out of eleven establishments were not fully enforcing some of the FSIS regulatory requirements.

- Seven out of eleven establishments audited had deficiencies reported in SSOP, primarily in implementation and recordkeeping...

#### 10.2 Sanitation Performance Standards

- Seven out of eleven establishments were not fully enforcing some of the SSOP requirements in sanitary operations, equipment and utensils, establishment construction/maintenance, and light intensity.

### 11. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditors reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Argentina's inspection system had adequate controls in place.

No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit. Argentina is not eligible to export fresh ruminant meat to the United States because APHIS does not consider Argentina free of Food-and-Mouth Disease.

### 12. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures, ante-mortem disposition, humane handling and humane slaughter, post-mortem inspection procedures, post-mortem disposition, ingredients identification, control of restricted ingredients, formulations, processing schedules, equipment and records, and processing controls of cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments and implementation of a testing program for generic *E. coli* in slaughter establishments and *Listeria monocytogenes* and *Salmonella* testing in Ready-to-Eat Products.

Specific deficiencies are reported in the attached individual establishment audit checklists.

#### 12.1 Humane Handling and Humane Slaughter

No deficiencies were noted.

#### 12.2 HACCP Implementation (BSE-SRM)

Both slaughter establishments approved to export meat products to the United States are required to have developed and adequately implemented HACCP programs. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program. The BSE-SRM program was properly implemented. The BSE is presently not a risk and is not present in Argentina.

- However, proper designation or use of SRM removing equipment was deficient in three out of nine slaughter establishments audited.

#### 12.3 Testing for Generic *E. coli*

Argentina has adopted the FSIS regulatory requirements for generic *E. coli* testing. Nine out of eleven establishments audited were required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* and were evaluated according to the criteria employed in the United States' domestic inspection program. Testing for generic *E. coli* was properly conducted in all nine establishments.

- However, written program for testing generic *E. coli* was using criteria for the excision method, while sponging method was being used by an establishment to collect samples in one out of nine establishments audited. Statistical process control technique had not been developed in this slaughter establishment in order to evaluate the results.

#### 12.4 Testing for *Listeria monocytogenes*

Five of the eleven establishments audited were producing ready-to-eat products, for the US markets, so the requirements for testing for *Listeria monocytogenes* according to the Final Rule of June 6, 2003, did apply to these establishments. Testing for *Lm* and *Salmonella* was being done for the "tube" products six times a year. Testing for *Lm* and *Salmonella* for the cooked, dried products was being done at the request of the establishment, on every lot produced for export.

### 13. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include 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.

Argentina's National Residue Testing Plan (Plan CREHA) for 2009 was being followed and was on schedule.

No deficiencies were noted.

#### 14. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella*.

##### 14.1 Daily Inspection in Establishments

Documented daily inspection was provided in all establishments on days during which US-eligible product was produced.

##### 14.2 Testing for *Salmonella* Species

Argentina has adopted the FSIS regulatory requirements for testing for *Salmonella* species. Nine of eleven slaughter establishments audited were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* species was properly conducted in all of the nine establishments.

##### 14.3 Testing for *E. coli* O157:H7

No deficiencies were noted.

##### 14.4 Species Verification

At the time of this audit, Argentina was required to test product for species verification. Species verification was being conducted in all slaughter establishments as required.

##### 14.5 Periodic Reviews

Periodic supervisory reviews of all certified establishments were being performed and documented as required.

##### 14.6 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, diseased or disabled animals; shipment security; and prevention of commingling of product intended for export to the United States with product intended for the domestic market.

Furthermore, controls were in place for security items, shipment security, and products entering the establishments from outside sources.

National mandates for the implementation of compliance with the requirements for special handling of (SRMs) regarding Bovine Spongiform Encephalopathy (BSE) have been implemented. Non-ambulatory cattle are condemned upon ante-mortem inspection, no beef containing SRMs is permitted in US-eligible product, mechanically-separated beef is ineligible for use in US-eligible product, and air-injection stunning is not permitted in Argentina.

- In eight out of eleven establishments Inspection Service was not fully enforcing some of the US requirements.

#### 15. CLOSING MEETING

A closing meeting was held on August 18 with the CCA. At this meeting, the primary findings, conclusions, and recommendations from the audit were presented by the auditor.

The CCA understood and accepted the finding.

Oto Urban, DVM  
Senior Program Auditor



#### 16. ATTACHMENTS

Individual Foreign Establishment Audit Forms  
Foreign country response to Draft Final Audit Report (when available)

United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Swift Armour S.A. Argentina Av. J. D. Peron S/N  V. Godor. Galvez, Santa Fe S2124IUA	2. AUDIT DATE 07/21/09	3. ESTABLISHMENT NO. 13	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP	X	33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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 actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	X	54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 07/21/09 Est #: 13 (Swift Armour S.A. Argentina [S/P/CS]) (V. Godor. Galvez, Argentina)

7/51 Written sanitation operation program did not include the de-assembling and re-assembling cleaning procedures of equipment used for the direct product contact area during the pre-operational sanitation. This deficiency should have been noticed by inspection personnel. Establishment agreed to include this portion to their written program 9 CFR 416.12(c).

26 Cans incubation room did not have evenly distributed indicating temperature device sensors. All these sensors were concentrated in one place and were not recording temperature distribution according the air circulation inside the incubator. This deficiency was also pointed out by the SENASA inspection service representative and it was immediately corrected by the establishment supervisor 9 CFR 318.309 (a) (4) (d) (i).

39 Several holes by forklifts were observed in the trimmings cooler wall. The establishment has identified this hazard during daily Sanitation Performance Standards (SPS) monitoring of this area. Additionally, this deficiency was properly handled by the IIC who asked establishment for corrective action. During the inspection of this room, auditor noticed continues repair of the other openings in the wall by the establishment 9 CFR.416.2 (3).

46/51 Edible container liner was observed contacting the floor in the trimmings cooler. This deficiency was corrected immediately by the establishment officials. This deficiency did not indicate a trend since other liners were not contacting an in-edible area. Additionally, I have reviewed several operational sanitation records but there was no recording of this deficiency 9 CFR 416.4 (d).

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE



3-15-2010

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Lafayette SA, 210, KM 47.5, Alejandro Korn, Provincia San Vicense of Buenos Aires.	2. AUDIT DATE 07/23/2009	3. ESTABLISHMENT NO. 1352	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	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	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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 actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	X
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Date: 07/23/2009 Est #: 1352 ([S/P]) (, Argentina)

10/51 Establishment personnel assigned for floor cleaning were also observed to handle product contact area surfaces without changing their gloves or washing their hands. There was confusion about employees' assignment to floor operation who were partially dressed in yellow rain coats in combination with white coveralls and employees fully dressed in yellow dress. Yellow color dressed employees were performing both; floor, as well as product contact area duties. This deficiency was scheduled for correction but should have been noted and corrected by the SENASA inspection service 9 CFR 416.13(c).

10 Water temperature device was recording 78°C of the sterilizer water in the slaughter room. This deficiency was corrected immediately by the establishment management. This was a random non-compliance since there was no other area with this type of deficiency. I reviewed several establishment and inspection sanitation records but I did not detect any trend observing this deficiency 9 CFR 416.13(c).

13 Description of some of pre-operational deficiencies on one occasion was very general. The inspection service was asked to be more specific in the description of these deficiencies. This was a random non-compliance because farther review of sanitation documents did not reveal reoccurrence of this deficiency 9 CFR 416.17(c).

54/51 The review of sanitation records revealed non functional light recorded in the ante-mortem pen area for several days without any corrective action from the establishment. This deficiency should have been corrected by establishment employees and enforced by SENASA inspection staff 9 CFR 309.1(b).

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

*Oto Urban*

3-15-2010

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Mirab S.A. Calle 3 y del Canal, Parque Industrial Pilar Pilar Prov. Buenos Aires 1629	2. AUDIT DATE 07/27/09	3. ESTABLISHMENT NO. 1067	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	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	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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 actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

## 60. Observation of the Establishment

Date: 07/27/09 Est #: 1067 (Mirab S.A. [P]) (Prov. Buenos Aires, Argentina)

39/51 The auditor observed that part of the rubber protection on the side and the bottom of the door was missing. Auditor was told by the Inspection Service that this door was programmed for repair but there was no written documentation of it on the premises. Door connecting the spice room with outside openings must be constructed and maintained to prevent the entrance of vermin, such as flies, rats, and mice 9 CFR 416.2 (b)(3).

45 Plastic container used for inedible product was not identified as such. It's identification and plastic liner could have been confused for receptacle used for edible product. This was an isolated incident since no other container was observed to have the same deficiency. Such receptacles must not be used for storing any edible product and must bear conspicuous and distinctive marking to identify permitted uses 9 CFR 416.3 (c).

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

*Oto Urban* 3-15-2010

United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

<b>1. ESTABLISHMENT NAME AND LOCATION</b> Frigorifico Godina SAIC La Plata Province of Buenos Aires.	<b>2. AUDIT DATE</b> 07/28/2009	<b>3. ESTABLISHMENT NO.</b> 2025	<b>4. NAME OF COUNTRY</b> Argentina
<b>5. NAME OF AUDITOR(S)</b> Oto Urban, DVM		<b>6. TYPE OF AUDIT</b> <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

<b>Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements</b>	Audit Results	<b>Part D - Continued Economic Sampling</b>	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	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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 actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Date: 07/23/2009 Est #: 2025 ([S/P]) (, Argentina)

10/51 During the pre-operational sanitation in the boning room, Auditor observed some unidentified dirt on the conveyor belt, as well as some parts of the plastic portions of the belt wearing off and having some hole in it, which makes conveyor belt difficult to clean. Inspection personnel informed the auditor that these belts are daily tested for microbiological contamination and one of them is scheduled for replacement. Immediate corrective action was performed by the inspection service and establishment to correct the surface contamination. The whole area was rejected till conveyor belts were re-cleaned. Each official establishment shall monitor daily the implementation of the procedures in the Sanitation SOP's 9 CFR 416.13 (c).

13 The establishment pre-operational SSOP record for the boning area of the date of the audit indicated that surface contamination found was just observation not a deficiency. Written records of the same week indicated that similar deficiencies were identified as deficiencies. There was inconsistency in reporting the same type of deficiencies. Establishment management took immediate corrective action. Each official establishment shall maintain daily records sufficient to document the implementation and monitoring of the Sanitation SOP's and any corrective actions taken 9 CFR 416.16 (a).

55 There was inconsistency identifying knives for removing SRM. The written program requires them to be identified in green color; some of them were identified as yellow and some (tonsils) not at all. Establishment management took immediate corrective action. Establishments that process the carcasses or parts of cattle must develop, implement, and maintain written procedures for the removal, segregation, and disposition of specified risk materials. These procedures must address potential contamination of edible materials with specified risk materials before, during, and after entry into the establishment 9 CFR 310.22 (2) (e).

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

*Oto Urban*

3-15-2010

United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorifico "FINEXCORT S.R.T." Nelson Santa Fe Region	2. AUDIT DATE 08/04/2009	3. ESTABLISHMENT NO. 0249	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	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	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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 actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Date: 08/04/2009 Est #: 0249 ([S/P]) (, Argentina)

10/51 The hook used by establishment employee to move exposed carcasses was observed to contact employee's boots in the slaughter room. This hook was too long and the establishment management response was to replace the hook with a shorter one. This deficiency was not recorded by the establishment or the Inspection Service sanitation records. Each official establishment shall monitor daily the implementation of the procedures in the Sanitation SOP's 9 CFR 416.13 (c).

45 Plastic containers identified as for edible product only was observed to be used for handling of inedible product in the boning room. Investigation of the establishment and Inspection Service sanitation records revealed that it was an isolated incident. This deficiency was immediately corrected by the establishment management. Receptacles used for storing inedible material must be of such material and construction that their use will not result in the adulteration of any edible product or in the creation of insanitary conditions. Such receptacles must not be used for storing any edible product and must bear conspicuous and distinctive marking to identify permitted uses 9 CFR 416.3 (c).

46/51 Connecting door between stairway and hall with moving carcasses to the cooler has a potential to contaminate carcasses when the door opens. Neither establishment nor Inspection Service sanitation records indicated any trend of this deficiency but corrective action by changing the entrance for this area was scheduled by the establishment officials. Product must be protected from adulteration during processing, handling, storage, loading, and unloading at and during transportation from official establishments 9 CFR 416.4 (d)

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

*Oto Urban* 3-15-2010

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorifico "J.B.S. Argentina" Venado Tuerto Santa Fe Region	2. AUDIT DATE 08/06/2009	3. ESTABLISHMENT NO. 1373	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	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	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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 actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Date: 08/06/2009 Est #: 1373 ([S/P]) (, Argentina)

10/51 Liner (plastic) designated for edible product use was observed to be contacted by employee's boots in the boning room. This liner is in the direct contact with the edible product. This deficiency was not recorded by the establishment or the Inspection Service sanitation records but was corrected immediately by the establishment officials. Each official establishment shall monitor daily the implementation of the procedures in the Sanitation SOP's 9 CFR 416.13 (c).

39 Door for unloading product in shipping dock was observed with defective rubber and consequent communication with outside premises. This may allow the entrance of crawling insect and rodents to the establishment. This deficiency was scheduled for repair by the establishment management. Walls, floors, ceilings, doors, windows, and other outside openings must be constructed and maintained to prevent the entrance of vermin, such as flies, rats, and mice. 9 CFR 416.2 (b)(3).

46/51 Unidentified plastic and flaking paint over the product handling area was observed in the slaughter room. Neither establishment nor Inspection Service sanitation records indicated any trend of this deficiency but change of the entrance for this area was scheduled by the establishment officials. Product must be protected from adulteration during processing, handling, storage, loading, and unloading at and during transportation from official establishments 9 CFR 416.4 (d).

55 Remnants of the spinal cord were found in the carcass in the carcass cooler. This deficiency was ordered to be corrected by the SENASA VIC and corrected immediately by the establishment management. Specified risk materials must be removed from the carcasses of cattle, segregated from edible materials, and disposed of in accordance with § 314.1 or § 314.3 of this subchapter. The spinal cord from cattle 30 months of age and older must be removed from the carcass at the establishment where the animal was slaughtered 9 CFR 310.22 (2) (c).

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

*Oto Urban* 8-15-2010

United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorifico "RAFAELA ALIMENTOS." Casilda 2170 Santa Fe Region	2. AUDIT DATE 08/07/2009	3. ESTABLISHMENT NO. 1399	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	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	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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 actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures	X	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 08/07/2009 Est #: 1399 ([S/P]) (, Argentina)

10 Four out of twenty carcasses were observed with spots of grease from the railing over the carcasses in the cooler. This deficiency was not recorded by the establishment or the Inspection Service sanitation records. Each official establishment shall monitor daily the implementation of the procedures in the Sanitation SOP's 9 CFR 416.13 (c).

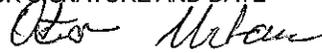
27 /51 Written program for testing of generic *E. coli* is using criteria for the excision method while sponging method is used by establishment to collect samples. Establishment is scheduled to use statistical process control technique for its sponging collection method. Establishments sponging carcasses shall evaluate *E. coli* test results using statistical process control techniques 9 CFR 310.25 (5) (ii).

46 Plastic containers identified for edible product were used for handling of inedible product in the boning room. Investigation of the establishment and Inspection Service sanitation records revealed that it was an isolated incident. This deficiency was immediately corrected by the establishment management. Receptacles used for storing inedible material must be of such material and construction that their use will not result in the adulteration of any edible product or in the creation of insanitary conditions. Such receptacles must not be used for storing any edible product and must bear conspicuous and distinctive marking to identify permitted uses 9 CFR 416.3 (c).

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

 3-15-2010

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorifico "CINA." Pueblo Esther Santa Fe Region	2. AUDIT DATE 08/10/2009	3. ESTABLISHMENT NO. 3540	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	O
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	
14. Developed and implemented a written HACCP plan.	O	41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O	42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.	O	43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.	O	44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.	O	46. Sanitary Operations	
19. Verification and validation of HACCP plan.	O	47. Employee Hygiene	
20. Corrective action written in HACCP plan.	O	48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.	O	<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O	49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	O
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	O
27. Written Procedures	O	<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

Date: 08/10/2009 Est #: 3540 ([CS]) (, Argentina)

“There were no significant findings to report after consideration of the nature, degree and extent of all observations.”

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

*Oto Urban* 3-15-2010

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorifico "ESTANCIAS DEL SUR." Unquillo Cordoba Region	2. AUDIT DATE 08/13/2009	3. ESTABLISHMENT NO. 2065	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	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	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		40. Light	X
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 actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	X
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Date: 08/13/2009 Est #: 2065 ([S/P]) (, Argentina)

40/51 The light intensity at the SENASA boneless meat re-inspection table in the boning room was about 300 lux while 540 lux is required by the FSIS at the inspection table. The SENASA inspection service scheduled the installment of additional light source. Lighting of good quality and sufficient intensity to ensure that sanitary conditions are maintained and that product is not adulterated must be provided in areas where food is processed, handled, stored, or examined; where equipment and utensils are cleaned; and in hand-washing areas, dressing and locker rooms, and toilets 9 CFR 416.2 (4)(c).

46 Several boxes with product were observed damaged in one cooler and freezer audited. The SENASA has already recorded this deficiency and the establishment has scheduled to buy new metal stands for boxes. Product must be protected from adulteration during processing, handling, storage, loading, and unloading at and during transportation from official establishments 9 CFR 416.4 (d).

55 The establishment employee separating the spinal cord from the head has been using the same knife for muscle and spinal cord. The establishment SRM written program requires employee to change knives while working with spinal cord and muscle. The IIC immediately corrected this deficiency. Establishments that slaughter cattle and establishments that process the carcasses or parts of cattle must develop, implement, and maintain written procedures for the removal, segregation, and disposition of specified risk materials. These procedures must address potential contamination of edible materials with specified risk materials before, during, and after entry into the establishment. Establishments must incorporate their procedures for the removal, segregation, and disposition of specified risk materials into their HACCP plans or Sanitation SOPs or other prerequisite programs 9 CFR 310.22 (2)(e)(1).

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

*Oto Urban* 3-15-2010

United States Department of Agriculture  
Food Safety and Inspection Service

### Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Finexcor S.R.L. Bernal Oeste, C.P. 1876 Province of Buenos Aires.	2. AUDIT DATE 07/29/2009	3. ESTABLISHMENT NO. 2062	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	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	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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 actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Date: 07/29/2009 Est #: 2062 ([S/P]) (, Argentina)

39 Several small holes were observed over the boxes to be used for product in the ceiling of the box storage area. This creates a potential hazard for the use of these boxes in cases of adverse environmental conditions. Establishment officials scheduled repair of the affected area. This deficiency was not noticed by the Inspection officials. Establishment buildings, including their structures, rooms, and compartments must be of sound construction, be kept in good repair, and be of sufficient size to allow for processing, handling, and storage of product in a manner that does not result in product adulteration or the creation of insanitary conditions 9 CFR 416.2 (b).

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

*Oto Urban*

3-15-2010

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION ARRE BEEF S.A. Perez Millan, part Ramalin Buenos Aires Province	2. AUDIT DATE 07/30/2009	3. ESTABLISHMENT NO. 2082	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	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	
<b>Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements</b>		<b>Part E - Other Requirements</b>	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	
<b>Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements</b>		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 actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
<b>Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements</b>		45. Equipment and Utensils	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		<b>Part F - Inspection Requirements</b>	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
<b>Part C - Economic / Wholesomeness</b>		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
<b>Part D - Sampling Generic E. coli Testing</b>		55. Post Mortem Inspection	
27. Written Procedures		<b>Part G - Other Regulatory Oversight Requirements</b>	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
<b>Salmonella Performance Standards - Basic Requirements</b>		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

## 60. Observation of the Establishment

Date: 07/30/2009 Est #: 2082 ( [S/P] ) (, Argentina)

13 Description of some of pre-operational deficiencies on one occasion was not specific. Establishment is going to change description of deficiencies to be more specific. Each official establishment shall maintain daily records sufficient to document the implementation and monitoring of the Sanitation SOP's and any corrective actions taken 9 CFR 416.16 (a).

45 Cleaning of moving bins was not sufficiently performed in the slaughter room. Washed bins were observed with blood and residues of viscera. This deficiency was corrected immediately by SENASA inspection service. Equipment and utensils must be maintained in sanitary condition so as not to adulterate product 9 CFR 416.3 (a)

61. NAME OF AUDITOR

Oto Urban, DVM

62. AUDITOR SIGNATURE AND DATE

*Oto Urban* 3-15-2010