United States Department of Agriculture

Food Safety and
Inspection Service

1400 Independence
Avenue, SW.
Washington, D.C.
20250

December 21, 2023

Ing. Agr. Diana Guillén
Presidente
Servicio Nacional de Sanidad y Calidad Agroalimentaria (SENASA)
Ministerio de Agroindustria
Paseo Colón 367-Piso 9
C1063ACD – Ciudad Autónoma de Buenos Aires
Argentina

Dear Ing. Agr. Diana Guillén,

The U.S. Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) conducted an onsite verification audit of Argentina's meat inspection system May 2–24, 2023. Enclosed is a copy of the final audit report. The comments received from the Government of Argentina are included as an attachment to the report.

Sincerely,

MICHELLE CATLIN

Digitally signed by MICHELLE CATLIN
Date: 2023.12.21 16:53:23 -05'00'

Michelle Catlin, PhD
International Coordination Executive
Office of International Coordination

Enclosure

FINAL REPORT OF AN AUDIT CONDUCTED OF

ARGENTINA

MAY 2–24, 2023

EVALUATING THE FOOD SAFETY SYSTEM GOVERNING

RAW BEEF PRODUCTS

EXPORTED TO THE UNITED STATES OF AMERICA

December 12, 2023

Food Safety and Inspection Service
U.S. Department of Agriculture

Executive Summary

This report describes the outcome of an onsite equivalence verification audit of Argentina conducted by the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) May 2–24, 2023. The purpose of the audit was to determine whether Argentina's food safety inspection system governing beef remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and properly labeled and packaged. Argentina currently exports raw intact beef products to the United States.

The audit focused on six system equivalence components: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Point (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

An analysis of the findings within each component did not identify any deficiencies that represented an immediate threat to public health. The FSIS auditors identified the following findings:

GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (e.g., INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING)

- During site visits at two certified establishments, the FSIS auditors observed that the Servicio Nacional de Sanidad y Calidad Agroalimentaria (SENASA) officials did not have animals moved out of the pens to observe them in motion and from both sides in accordance with SENASA requirements. Instead SENASA officials were performing visual inspection of the animals at rest and in motion within the pens. Additionally, government inspection personnel did not record a second signature on the slaughter authorization section of each pen card prior to releasing the animals for slaughter.

GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM

- During site visits at multiple certified establishments, the FSIS auditors observed that SENASA did not ensure that certified establishments were properly documenting HACCP monitoring as all records did not include the time and initials of the employee performing the monitoring procedure. Additionally, SENASA did not ensure that certified establishments pre-shipment review records included documentation of the review of critical limits for the indicated product.

During the audit exit meeting, SENASA committed to address the preliminary findings as presented. FSIS will evaluate the adequacy of SENASA's proposed corrective actions and base future equivalence verification activities on the information provided.

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I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture (USDA) conducted an onsite audit of Argentina's food safety system May 2–24, 2023. The audit began with an entrance meeting May 2, 2023, in Buenos Aires, Argentina, during which the FSIS auditors discussed the audit objective, scope, and methodology with representatives from the Central Competent Authority (CCA), Servicio Nacional de Sanidad y Calidad Agroalimentaria (SENASA). During the audit exit meeting held May 24, 2023, SENASA committed to address the preliminary findings. Representatives from SENASA accompanied the FSIS auditors throughout the entire audit.

II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a routine ongoing equivalence verification audit. The audit objective was to determine whether the food safety inspection system governing beef products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and properly labeled and packaged. Argentina is eligible to export the following categories of products to the United States:

Process Category	Product Category	Eligible Products[1]
Raw - Intact	Raw Intact Beef	Beef - All Products Eligible except Cheek Meat; Head Meat; Heart Meat; and Weasand Meat
Raw - Non Intact	Raw Ground, Comminuted, or Otherwise Non-intact Beef	Beef - All Products Eligible except Advanced Meat Recovery Product (AMR); Finely Textured Beef (FTB); Low Temperature Rendered Product (LTRP); Other Non-Intact; Partially Defatted Beef Fatty Tissue (PDBFT); and Partially Defatted chipped Beef (PDCB)

The USDA's Animal and Plant Health Inspection Service (APHIS) has declared beef imported from Argentina subject to bovine spongiform encephalopathy (BSE) requirements specified in Title 9 of the United States Code of Federal Regulations (9 CFR) 94.18 or 9 CFR 94.19. In addition, Argentina is affected with foot-and-mouth disease (FMD), and beef is subject to requirements in 9 CFR 94.4, except beef imported from the region of Argentina comprised of Patagonia North "B" and Patagonia South, which is subject to animal health requirements

[1] All source beef used to produce products must originate from eligible countries and establishments certified to export to the United States.

specified in 9 CFR 94.11. Fresh (chilled or frozen) beef imported from the Northern Argentina region is subject to animal health requirements specified in 9 CFR 94.29.

Prior to the onsite equivalence verification audit, FSIS reviewed and analyzed Argentina's Self-Reporting Tool (SRT) responses and supporting documentation, including official chemical residue and microbiological sampling plans and results. During the audit, the FSIS auditors conducted interviews and reviewed records to determine whether Argentina's food safety inspection system governing beef is being implemented as documented in the country's SRT responses and supporting documentation.

FSIS applied a risk-based procedure that included an analysis of country performance within six equivalence components, product types and volumes, frequency of prior audit-related site visits, point-of-entry (POE) reinspection and testing results, specific oversight activities of government offices, and testing capacities of laboratories. The review process included an analysis of data collected by FSIS over a 3-year period, in addition to information obtained directly from SENASA through the SRT.

Determinations concerning program effectiveness focused on performance within the following six components upon which system equivalence is based: (1) Government Oversight (e.g., Organization and Administration); (2) Government Statutory Authority and Food Safety and Other Consumer Protection Regulations (e.g., Inspection System Operation, Product Standards and Labeling, and Humane Handling); (3) Government Sanitation; (4) Government Hazard Analysis and Critical Control Point (HACCP) System; (5) Government Chemical Residue Testing Programs; and (6) Government Microbiological Testing Programs.

The FSIS auditors reviewed administrative functions at SENASA headquarters, 2 regional offices, and 12 local inspection offices within the establishments. The FSIS auditors evaluated the implementation of control systems in place that ensure the national system of inspection, verification, and enforcement is being implemented according to SENASA's requirements.

A sample of 12 establishments was selected from a total of 31 establishments certified to export to the United States. This included 12 beef slaughter and processing establishments. The products these establishments produce and export to the United States include raw intact beef.

During the establishment visits, the FSIS auditors paid particular attention to the extent to which industry and government interacted to control hazards and prevent noncompliance that threatens food safety. The FSIS auditors assessed SENASA's ability to provide oversight through supervisory reviews conducted in accordance with FSIS equivalence requirements for foreign food safety inspection systems outlined in 9 CFR 327.2.

The FSIS auditors also visited one microbiological and one chemical residue laboratory to verify that these laboratories can provide adequate technical support to the food safety inspection system.

Competent Authority Visits		#	Locations
Competent Authority	Central	1	• SENASA Headquarters, Buenos Aires
	Regional	2	• Metropolitana Regional Office, Buenos Aires • Entre Ríos Regional Office, Entre Ríos
Laboratories		2	• SENASA Dirección General de Laboratorios y Control Técnico (DGLyCT) Microbiological Laboratory, (government) Martínez City • Laboratorio Litoral SA, Chemical/Residue Laboratory, (private) Rosario
Beef slaughter and processing establishments		12	• Establishment No. 1920, Frigorífico Rioplatense SAICIF (Formerly Frigorífico Rioplatense S.A.I.C.I.F.), General Pacheco • Establishment No. 13, Swift Argentina SA, (Formerly Swift Argentina S.A.), Villa Gobernador Gálvez • Establishment No. 5039, Azul Natural Beef S.A., Azul • Establishment No. 2595, Frigorífico Alberdi S.A., Oro Verde • Establishment No. 89, Mattievich S.A., Carcarañá • Establishment No. 1113, Marfrig Argentina Sociedad Anónima (Formerly Marfrig Argentina S.A.), Villa Mercedes • Establishment No. 249, Friar S.A., Nelson • Establishment No. 1014, Quickfood S.A., San Jorge • Establishment No. 2062, Compañia Bernal S.A., Bernal • Establishment No. 4069, Logros S.A., Río Segundo • Establishment No. 3676, Frigolar S.A., Abasto • Establishment No. 189, S.A. Importadora Y Exportadora De La Patagonia (Formerly Sociedad Anónima Importadora y Exportadora de la Patagonia), Salto

FSIS performed the audit to verify that Argentina's raw beef food safety inspection system meets requirements equivalent to those under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 United States Code (U.S.C.) Section 601 et seq.);
- The Humane Methods of Slaughter Act (7 U.S.C. Sections 1901-1907); and
- The Meat Inspection Regulations (9 CFR parts 301 to the end).

The audit standards applied during the review of Argentina's inspection system for beef products included: (1) all applicable legislation originally determined by FSIS as equivalent as part of the

initial review process, and (2) any subsequent equivalence determinations that have been made by FSIS under provisions of the World Trade Organization's Agreement on the Application of Sanitary and Phytosanitary Measures.

III. BACKGROUND

From November 1, 2019, to October 31, 2022, FSIS import inspectors performed 100 percent re-inspection for labeling and certification on 131,352,293 pounds of meat from Argentina. This included 131,350,057 pounds of raw intact beef; and 2,236 pounds of raw non-intact beef exported from Argentina to the United States. Of these amounts, additional types of inspection were performed on 11,000,713 pounds of raw intact beef. These additional types of inspection included physical examination, chemical residue analysis, and testing for microbiological pathogens (Shiga toxin-producing *Escherichia coli* (STEC) serogroups O157, O26, O45, O103, O111, O121, and O145 in beef). As a result of this additional testing, 130,168 pounds of beef were rejected for issues related to public health, including STEC positives, violative levels of chemical residues, and presence of abscesses. An additional 182,187 pounds of beef products were refused for other issues not related to public health including shipping damage, labeling, or other miscellaneous issues. FSIS evaluated SENASA's corrective action responses, found them sufficient, and closed the POE violations.

The previous FSIS audit of Argentina's beef products food safety inspection system conducted from July 27 to August 27, 2021, did not identify any findings representing an immediate threat to public health.

The most recent final audit reports for Argentina's food safety inspection system are available on the FSIS website at: www.fsis.usda.gov/foreign-audit-reports.

IV. COMPONENT ONE: GOVERNMENT OVERSIGHT (e.g., ORGANIZATION AND ADMINISTRATION)

The first equivalence component the FSIS auditors reviewed was Government Oversight. FSIS import regulations require the foreign food safety inspection system to be organized by the national government in such a manner as to provide ultimate control and supervision over all official inspection activities; ensure the uniform enforcement of requisite laws; provide sufficient administrative technical support; and assign competent qualified inspection personnel at establishments where products are prepared for export to the United States.

SENASA is the CCA of Argentina's meat inspection system and has the overall authority and responsibility for rulemaking, implementation and enforcement, and policy decisions in all certified establishments. Regulatory Decree No. 4238/68 is the legislative law which provides food safety regulations of meat products and ensures direct oversight of certified establishments authorized to produce beef products for export to the United States. SENASA is organized into seven directorates, each of which have a role in their beef products inspection system, including the following; National Directorate for Operations, National Directorate for Animal Health, National Directorate for Plant Health, National Directorate for Safety and Quality, General Directorate for Technical and Administrative Affairs, General Directorate for Laboratories and

Technical Control, and the Directorate for Legal Affairs. The FSIS auditors confirmed through interviews that there have been no major changes to the organizational structure of SENASA since the previous FSIS audit in 2021.

Official controls are administered through the Regional Competent Authority (RCA), which is located in fourteen regional centers throughout the country, and through the Veterinary Inspection Service (VIS), located in inspection offices within each individual certified establishment. The VIS is comprised of official veterinarians (OV) and official assistants (OA) who carry out official duties in accordance with Regulatory Decree No. 4238/68. The RCA ensures adequate staffing of the VIS personnel and provides for monthly supervisory reviews by an RCA supervisor. VIS personnel ensure program verification tasks are completed according to schedule for each day and each shift of operation, and that official sampling tasks assigned by the RCA are performed. The FSIS auditors verified that SENASA has procedures in place to ensure that an effective level of oversight is maintained. OAs are present to inspect every carcass and its parts during slaughter under the supervision of an OV, and OVs and OAs conduct processing inspection activities at least once per shift. The FSIS auditors verified that all officials conducting inspection activities are government employees paid directly by SENASA.

The FSIS auditors verified the process for certification of an establishment as eligible to export raw beef products to the United States. An establishment must officially apply to SENASA and provide their written food safety system for review. SENASA reviews the establishment's written programs, and if these are acceptable, conducts an onsite audit of the establishment's facilities and food safety systems while they are in operation. SENASA provides a written report regarding the establishment's compliance with both SENASA requirements and specific FSIS import requirements and requires corrective actions for any findings. Upon acceptable onsite audit results, which includes verification of corrective measures taken in response to any findings, SENASA will certify the establishment and request that FSIS list the establishment as eligible to export raw beef products to the United States.

VIS personnel are authorized to take regulatory control actions in establishments to ensure compliance with SENASA's requirements. SENASA has several actions and outcomes that may be taken based on the type of observation and potential severity on food safety. VIS personnel may issue a noncompliance record if a finding does not pose a risk to product, or a nonconformance is documented if product is affected by the observation; both actions require corrective actions and a response from establishment quality control personnel. VIS personnel may also identify a trend of noncompliance or nonconformance, which will require a response from establishment management in addition to quality control personnel. SENASA may also take an enforcement action such as suspension or delisting of the establishment as eligible to export beef products to the United States based on the severity of observations. For each action taken, SENASA documents the findings or observations, and performs follow-up verification of the corrective actions once completed by the establishment.

SENASA's educational requirements are specific to an official employee's position and are set within Resolution 532/2014 which provides a description of the positions and associated job duties and activities. The FSIS auditors verified that training sessions for all VIS personnel are held upon initial hiring of an official, and subsequent training courses are held on a continuing

as-needed basis. VIS personnel are trained based on their specific job duties including requirements and performance of activities of ante-mortem, post-mortem, animal welfare and humane handling, transport of animals, export certification, sanitation, HACCP, and sampling techniques. VIS personnel are also trained regarding specific FSIS import requirements including labeling, test and hold, pre-shipment review, and any changes or updated procedures.

SENASA requires raw beef products intended for export to the United States to be derived from animals that were born, reared, and slaughtered in Argentina. These SENASA requirements are verified through the Sistema de Gestión de Sanidad Animal and through the issuance of an Electronic Movement Document whereby health, origin, and movement of animals are tracked. The FSIS auditors verified that animal origin and movement records are reviewed at reception of animals at the pens to determine if animals within a pen are eligible for slaughter and export, and that controls are in place to segregate export eligible animals from those not eligible for export. Additionally, the FSIS auditors verified that carcasses, in process cuts and packaged raw beef products were identified and segregated as necessary when eligible for export to the United States in accordance with SENASA's requirements.

SENASA requires all establishments to maintain traceability of all beef products beginning with the source of animals for slaughter through the entire production process and ending with the export certification process. The establishment must provide all traceability information for the creation and issuance of the provisional sanitary certificate of export (CSEP) and subsequent creation and issuance of the definitive sanitary certificate of export (CSED) approving the export of products. In accordance with Circular No. 3958 establishments are required to immediately inform SENASA of the shipment of adulterated product, be capable of a market withdrawal or recall of products when necessary and must maintain a written recall plan and conduct a test recall yearly as part of that plan. The FSIS auditors verified that an OV verifies traceability documents as part of the export verification process, and reviews establishment programs as part of the routine daily verification procedures. The FSIS auditors verified that SENASA has a mechanism in place to notify FSIS of the shipment of non-compliant or adulterated products. There have been no recalls of beef products exported from Argentina to the United States since the previous FSIS audit in 2021.

SENASA ensures that only products that have been inspected and that are eligible for export to the United States are certified through the use of the Sistema de Gestión de Certificación (SIGCER), an electronic export certification system. A certified establishment is responsible for requesting export approval within the SIGCER system and providing all product information to the VIS personnel for review. The FSIS auditors verified that the OV then reviews origin and traceability of products, labeling and shipping marks, acceptability of food safety programs, and that all testing results have been returned as acceptable. The OV at the establishment is then able to indicate approval in the SIGCER system and sign the CSEP, which allows movement of the product container to an exit port under a SENASA seal. Product is then moved to the border exit post, where a VIS official verifies loading of product on the exporting vessel, after which SENASA's Office of Certification personnel then provide and sign the CSED for official approval of the product to be exported to the United States.

SENASA, through the National Directorate of Laboratories and Technical Control (DILAB), is responsible for authorizing and controlling its national network of laboratories. All network laboratories must comply with SENASA requirements and be accredited in accordance with International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025 standards, by the Argentine Accreditation Organization (OAA). DILAB directly supervises the official network of authorized laboratories. DILAB reports directly to the President of SENASA and has the authority to revoke the registration of laboratories when necessary.

Authorized laboratories are subject to an annual OAA audit and must comply with the requirements established by SENASA to remain in the national network of laboratories. SENASA uses both government and private laboratories for conducting analyses on samples taken by VIS personnel at certified establishments. These laboratories participate routinely in proficiency testing administered both internally and by external entities. DILAB and the officials of regional laboratories also conduct internal audits of authorized laboratories, focusing on the quality management system, recordkeeping, and the technical expertise of personnel responsible for carrying out each analysis. The FSIS auditors confirmed laboratories are routinely audited by OAA and DILAB and reviewed the results of the most recent OAA and DILAB audits.

SENASA's national network of laboratories include microbiology and chemical residue laboratories that are required to use methods that are scientifically validated. The National Reference Microbiology Laboratory, which is a government operated facility, currently performs analyses of government *Salmonella* and STEC samples collected by VIS personnel. The FSIS auditors verified that the laboratory currently uses the FSIS Microbiology Laboratory Guidebook test methods for STEC and *Salmonella* and reports the results according to SENASA's reporting requirements. The FSIS auditors also verified that the laboratory has appropriate programs in place and maintains records for all procedures and steps official samples undergo, including receiving of the sample to ensure package integrity, tracking, documenting each step of the analysis process, calibrating equipment, internal employee training programs, and proficiency requirements specific to the analyses performed.

The FSIS auditors verified that SENASA designated laboratories do not retest samples when results are found to be violative or unacceptable. The laboratories follow test methods required by SENASA for official samples of products intended for export to the United States. Test results are reported in a timely manner and products are held pending acceptable results prior to certification for export to the United States.

The FSIS audit verification activities indicate that Argentina's beef inspection system is organized and administered by the national government, and that SENASA inspection officials are authorized and assigned to enforce the laws and regulations governing beef products, providing ultimate control, supervision, and enforcement of regulatory requirements.

V. COMPONENT TWO: GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (e.g.,

INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING)

The second equivalence component the FSIS auditors reviewed was Government Statutory Authority and Food Safety and Other Consumer Protection Regulations. The system is to provide for humane handling and slaughter of livestock; ante-mortem inspection of animals; post-mortem inspection of every carcass and its parts; controls over condemned materials; controls over establishment construction, facilities, and equipment; at least once per shift inspection during processing operations; and periodic supervisory visits to official establishments.

The FSIS auditors verified that SENASA requires an OV to perform ante-mortem inspection of each animal prior to slaughter in accordance with Regulatory Decree No. 4238/68. Prior to observing animals, the OVs verify animal origin, number, movement, traceability, and herd health information through review of electronic transport documents. If present during arrival of the animal transport truck, the OV observes unloading of the animals and movement into pens to identify any abnormalities which require the separation of the animal for further examination in a separate suspect pen. If the transport truck arrives while an OV is not present, the animals are to be unloaded and moved to a pen and await arrival of the OV for ante-mortem inspection. Upon arrival of the OV, the animals are to be moved out of the pen into an alleyway or other area so that the OV can observe all animals in motion and from both sides. The FSIS auditors verified that OVs are required to record and document completion of ante-mortem inspection tasks on pen cards and authorize the release of each pen of animals for slaughter by signing the pen card. Regarding the signature for authorization prior to releasing the animals that passed ante-mortem inspection for slaughter and the ante-mortem inspection of animals that arrived when an OV is not present, the following findings were identified.

- During site visits at two certified establishments, the FSIS auditors observed that the SENASA officials did not have animals moved out of the pens to observe them in motion and from both sides in accordance with SENASA requirements. Instead, SENASA officials were performing visual inspection of the animals at rest and in motion within the pens. Additionally, government inspection personnel did not record a second signature on the slaughter authorization section of each pen card prior to releasing the animals for slaughter.

OVs continually observe animals throughout the day to ensure that any animal injured during transport, during unloading of transport trucks, within the pens or when moved to slaughter at the certified establishment are identified in accordance with SENASA's requirements. Any animals which arrive or become injured or non-ambulatory disabled are segregated and not permitted for use in the production of raw beef products intended for export to the United States. The OV assigned to oversight of the pens is required to evaluate animals for signs of neurological diseases, segregate and condemn those animals which exhibit clinical signs or are suspect and submit samples taken for analysis for BSE. The FSIS auditors verified that the OV ensures water is available at all times, and that feed is available if animals are held for more than 24 hours. The conditions of pens and humane treatment of animals during movement by establishment employees are also verified by the assigned OV. The FSIS auditors also verified that verification of stunning effectiveness and humane handling activities at the point of slaughter occurs

according to Circular Letter No. 4301A and that the OV documents and takes enforcement actions as necessary based on observations of ineffective stunning or a failure to meet humane handling requirements.

The FSIS auditors verified that SENASA has VIS personnel at certified establishments assigned to conduct examinations of the feet, lips, and snout of each individual animal to monitor for signs of FMD according to APHIS requirements. The auditors also observed and verified controls are in place to ensure pH monitoring for each half carcass occurs after maturation within the cooling chambers prior to releasing carcasses for cutting operations. The FSIS auditors verified that OAs conduct post-mortem inspection of every carcass, head, and viscera under the supervision of OVs, by visual inspection of carcass surfaces and cavities, palpation, and incisions of the head, lymph nodes, and viscera ensuring a full evaluation of each carcass. OVs verify that certified establishments follow the requirements of Circular Letter No. 4246A for the identification, segregation, and removal of specified risk materials (SRM) for BSE as defined by SENASA. The FSIS auditors verified that SRMs are removed, identified, controlled, and handled according to SENASA's requirements. The FSIS auditors also verified that SENASA ensures the control of condemned materials and animals as part of their routine verification procedures of identification and marking control systems at each certified establishment.

A supervisor from the RCA performs monthly supervisory visits in accordance with the provisions of Circular Letter No. 4362. During the monthly supervisory visit, the supervisor reviews both certified establishment programs and records for compliance as well as performance of VIS personnel. SENASA auditors also perform routine audits of certified establishments a minimum of once every 2 years. An audit may also be scheduled for cause based on ongoing evaluation of inspection report data within the Sistema de Gestión de Inocuidad y Calidad Agroalimentaria system. All supervisory visits and audits include written documentation of any findings and follow-up verification of corrective actions, when necessary, by the respective RCA supervisor or auditor who performed the initial review or audit. The FSIS auditors verified that certified establishments must respond to findings with corrective actions and that RCA supervisors and SENASA auditors conducted follow-up activities to verify the corrective actions proffered by the certified establishments.

The FSIS auditors verified that SENASA requires certified establishments to properly label products and submit each label to SENASA for approval prior to its use on finished beef product immediate container packaging. Labels must include product name, shipping identification mark, country of origin, name and address of the manufacturer or distributor, net weight of the product, a handling statement, and safe handling instructions. Any labels with claims must additionally be approved by FSIS prior to their use by a certified establishment. VIS personnel conduct reviews of labels for specific FSIS labeling requirements during the export verification process.

The FSIS audit verification activities indicate that SENASA maintains the legal authority and a regulatory framework that is consistent with the criteria for this component to meet the core equivalence requirements. However, the FSIS auditors did identify that not all OVs document and perform ante-mortem procedures according to SENASA's requirements.

VI. COMPONENT THREE: GOVERNMENT SANITATION

The third equivalence component the FSIS auditors reviewed was Government Sanitation. The FSIS auditors verified that the CCA requires each official establishment to develop, implement, and maintain written sanitation standard operating procedures (Sanitation SOP) to prevent direct product contamination or insanitary conditions, and to maintain requirements for sanitation performance standards (SPS) and sanitary dressing.

The FSIS auditors verified that Regulatory Decree No. 4238/68 requires that all establishments where animals are slaughtered or foods are stored or processed must comply with SPS, Good Manufacturing Practices or operational SOPs, and Sanitation SOPs. Certified establishments are required to develop, implement, and maintain Sanitation SOPs to ensure operations occur under sanitary conditions. The FSIS auditors verified that SENASA requires certified establishments to take corrective actions including disposition of contaminated product, restoration of hygienic conditions, and measures to prevent recurrence of product contamination. The FSIS auditors also verified that certified establishments maintained daily Sanitation SOP records of implementation, monitoring, and corrective actions.

The FSIS auditors verified that VIS personnel follow instructions in Circular Letter No. 4301A to verify a certified establishment's compliance with sanitation requirements. VIS personnel perform a daily pre-operational inspection after establishment personnel indicate the facility, equipment, and tools are ready for operations. The FSIS auditors verified that OVs document all results of sanitation inspections including when nonconformance or noncompliance is identified on the Annex II form in Circular Letter No. 4301A. When an observation of noncompliance or nonconformance occurs, the VIS personnel reviews establishment responses and verifies corrective actions taken adequately address the observed deviations.

SENASA requires all establishments to ensure sanitary dressing of carcasses throughout the slaughter process through Circular Letter No. 4301A. The FSIS auditors verified that an OV performs twice daily verification of dressing procedures to ensure certified establishment personnel follow sanitary practices including adequate separation of carcasses to prevent cross contamination; cleaning and sterilization of equipment and utensils; handling of hides of carcasses during the de-hiding process; and washing of hands, arms, and aprons which may contact carcasses or parts of the animal. The OV documents the result of twice daily sanitary dressing verification, including determinations of nonconformance or noncompliance and any VIS actions taken, on the Annex II form in Circular Letter No. 4301A.

The FSIS auditors verified through observations and review of records that OAs perform post-mortem inspection of every carcass, head, and viscera and identify any fecal, ingesta, or milk contamination which must be trimmed immediately. Establishment personnel may trim the contamination immediately upon an OAs observation, or the OA may identify the carcass to be railed out for more extensive trimming if required. Carcasses segregated from the slaughter line must be reinspected by the VIS personnel prior to being moved back into the regular flow of the slaughter line. The FSIS auditors also verified that an OV performs a minimum of two random zero-tolerance verification checks for fecal, ingesta, or milk prior to any washing of the carcass and before entering the chill chambers per shift. The OV documents the result of the zero-

tolerance verification procedures on the Annex III form in Circular Letter No. 4301A. The FSIS auditors also verified that if fecal, ingesta, or milk are observed by OVs during the random verification process, the OV documents a nonconformance on Annex II of Circular Letter No. 4301A, which requires a corrective action response from the establishment.

The FSIS auditors assessed the adequacy of VIS verifications by observing in-plant VIS personnel conducting pre-operational sanitation in two of the certified establishments. VIS personnel conducted verification procedures after the certified establishment had conducted its own pre-operational sanitation verification procedures. The FSIS auditors also observed in-plant VIS personnel's daily verification of operational sanitation procedures and sanitary dressing procedures. FSIS auditors' review of VIS records at each certified establishment provided an indication that in-plant VIS personnel identify, and document findings with sanitation and dressing procedures and require certified establishments to take corrective actions as appropriate.

The FSIS audit verification activities indicate that SENASA requires operators of certified establishments to develop, implement, and maintain sanitation programs, including requirements for SPS, Sanitation SOPs, and sanitary dressing procedures. FSIS concluded that SENASA continues to meet the core requirements for this component.

VII. COMPONENT FOUR: GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM

The fourth equivalence component the FSIS auditors reviewed was Government HACCP System. The food safety inspection system is to require that each official establishment develop, implement, and maintain a HACCP system.

The FSIS auditors verified that SENASA requires certified establishments to comply with Resolution No. 205/2014, which mandates HACCP requirements as part of Regulatory Decree No. 4238/68. All establishments where animals are slaughtered or where foods are processed or stored must comply with SENASA's HACCP requirements. Circular Letter No. 4299 provides instructions for VIS personnel on how to conduct a comprehensive review of an establishment's HACCP system at a frequency of at least yearly. The FSIS auditors verified that when the VIS personnel conduct a comprehensive review, they verify the establishment's flow chart, hazard analysis, supporting documentation for critical control points (CCP) and critical limits, supporting documentation for decisions made in the hazard analysis, documentation for validation of the programs, and documentation of reassessments as required.

The FSIS auditors verified that the VIS verifies implementation by the certified establishment of monitoring, corrective actions, verification, recordkeeping, and reassessment daily according to instructions of Circular Letter No. 4301A. The OV can choose to verify CCPs through direct observation of monitoring, record review, or direct measure by performing the CCP monitoring procedure themselves. The FSIS auditors conducted onsite observation and document review of CCPs in certified establishments which were visited as part of the audit. FSIS auditors observed VIS personnel verification of establishment personnel conducting zero-tolerance monitoring for fecal, ingesta, and milk. The FSIS auditors reviewed SENASA records including findings and documentation of actions taken by VIS when there was a CCP failure, and the records of

corrective actions taken by the certified establishment in response to VIS findings. Although the FSIS auditors verified that monitoring procedures occurred according to written HACCP plans, and that during the pre-shipment review process establishment personnel reviewed CCP monitoring records, the following findings regarding documentation of CCP monitoring and pre-shipment review records were observed.

- During site visits at multiple certified establishments, the FSIS auditors observed that SENASA did not ensure that certified establishments were properly documenting HACCP monitoring as all records did not include the time and initials of the employee performing the monitoring procedure. Additionally, SENASA did not ensure that certified establishments pre-shipment review records included documentation of the review of critical limits for the indicated product.

The FSIS auditors verified that certified slaughter establishments have controls in place to ensure carcasses are chilled in a manner to prevent the outgrowth of pathogens. Certified establishments visited as part of the audit implement carcass swab testing for microbial indicator organisms in order to evaluate process control according to SENASA requirements. Circular No. 4201B also requires certified establishments to develop and implement a sampling plan for STEC as part of a self-control system of their HACCP procedures. Sampling according to these SENASA requirements provides for verification of the certified establishment's food safety system and supports their programs as effective in controlling the identified hazards.

The FSIS audit verification activities indicate that SENASA requires operators of certified establishments to develop, implement, and maintain a HACCP system. FSIS concludes that SENASA continues to meet the core requirements for this component.

VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS

The fifth equivalence component the FSIS auditors reviewed was Government Chemical Residue Testing Programs. The food safety inspection system is to present a chemical residue testing program, organized, and administered by the national government, which includes random sampling of internal organs, fat, or muscle of carcasses for chemical residues identified by the exporting country's beef products inspection authorities or by FSIS as potential contaminants.

The FSIS auditors verified that SENASA continues to maintain the legal authority to regulate, plan, and execute activities of the national residue control program that are aimed at preventing and controlling the presence of residues of veterinary drugs and chemical contaminants. The legal framework for SENASA's plan for control of residues and hygiene in food products of animal origin is outlined in Resolution No. 458/2012. Argentina's National Plan for the Control of Residues and Food Hygiene (CREHA) is developed and administered by SENASA to plan and manage the testing of live animals, carcasses, or parts for residues and contaminants in beef products. The CREHA plan is developed annually based on the prior year's test results, changes in scientific criterion and methodology, and inputs from international scientific organizations and is created with an overall focus on ensuring proportionality of sampling based on regional production volumes.

Resolution No. 125/98 provides for the management of a noncompliant or violative test result and ensures the supplier of the live animal is placed on the Establishments with a history of Residues (EAR) residue violation list. Resolution No. 14/2020 created an additional residue violation list called the Establishments with a history of Residues-Destination (EARD), which now includes animal suppliers who are not eligible to supply animals for slaughter based on the intended export market of the beef products. Resolution No. 467/2012 provides that certified establishments cannot receive animals from a farm listed on the EAR or EARD lists if product is intended for export to the United States, and that an OV at the establishment is to verify this requirement prior to receiving live animals from transport trucks. The FSIS auditors verified that SENASA initiates an official investigation into the cause of a violative result, conducts traceback activities to the supplier, and schedules targeted follow-up samples of the EAR or EARD list of farms.

The FSIS auditors verified that in-plant VIS personnel who collect the residue samples are following SENASA's sampling protocol. This protocol includes residue sampling methodology, random selection of animals, sampling frequency, traceability, and sample integrity to designated laboratories. SENASA headquarters is responsible for sending sampling schedules to the RCA who then submits sample schedules to the VIS chief at each regulated establishment. In the case of product intended for export to the United States, SENASA requires sampled carcasses to be held pending acceptable chemical residue test results. As outlined in Circular Letter No. 4011/2012, a violative test result is considered final and there can be no request to analyze any other sample. Additionally, SENASA maintains a listing of the maximum residue limits permitted for carcasses intended for export to the United States which is consulted any time chemical residue results are identified in a sample to ensure that products intended for export to the United States do not contain prohibited drugs and contaminants or chemical residues at levels that exceed established U.S. tolerances.

The FSIS audit verification activities indicate that SENASA has overall authority of a chemical residue testing program which is designed and implemented to prevent and control the presence of chemical residues in beef products destined for export to the United States.

IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS

The last equivalence component the FSIS auditors reviewed was Government Microbiological Testing Programs. The food safety inspection system is to implement certain sampling and testing programs to ensure that raw beef products prepared for export to the United States are safe and wholesome.

SENASA requires microbiological sampling programs be implemented by VIS personnel and establishments for verification of the beef slaughter process at establishments exporting products to the United States. These requirements include *Salmonella* and STEC sampling by government personnel at establishments. In addition, SENASA requires establishments to implement sampling programs for STEC on raw beef exported to the United States. SENASA considers raw ground beef, trimmings, or other components intended for non-intact use that test positive for

Salmonella or STEC to be adulterated, and that those products must not be shipped to the United States.

The FSIS auditors verified SENASA requires an establishment to carry out the microbiological evaluation for generic *E. coli* in beef carcasses sampled to ensure that process control systems are effectively preventing contamination. Circular No. 3259 provides verification procedures for VIS personnel for indicator organism sampling and testing by establishments. The VIS verifies the establishment's implementation of generic *E. coli* sampling and analysis by reviewing the results and verifying the sampling procedure. The VIS verifies the implementation of the establishment's program on a regular basis. When violations occur, the establishment is required to implement corrective actions to reestablish process control which is verified by the VIS. Regional supervisors verify the establishment's written procedures meet the requirements during monthly supervisory reviews.

Circular No. 4245 outlines requirements for official verification sampling of *Salmonella* on cattle carcasses. The VIS is responsible for the collection and preparation of the sample for shipment in a sealed package, which is then sent to an authorized SENASA national network laboratory for analysis. For each set, sample collection is performed aseptically on a randomly chosen carcass on a daily basis when carcasses are produced. A sample sets consists of 82 samples taken on consecutive days. A sample collection record is filled out and accompanies the sample to the laboratory in a sealed sample container. SENASA requires corrective actions to be taken by the establishment for each positive test result; the maximum allowable number of positives in a set of 82 samples is 1. If this standard is not met, then corrective actions must be taken by the establishment and a new sample set is immediately initiated. If three sample sets fail to meet the standard, then the establishment will be suspended from exporting to the United States until it takes corrective actions and can demonstrate a reduction in the prevalence of *Salmonella*. The FSIS auditors directly observed sampling, reviewed test results, and interviewed government inspection personnel and did not identify any concerns with SENASA's official *Salmonella* testing program.

Circular No. 4210B requires OVs to perform official government verification sampling of raw beef products for STEC using N60 sampling methodology. The FSIS auditors verified that government STEC verification sampling procedures include the N60 sampling methodology, sample weight, lot size definition, sample packing, and actions for positive results. The VIS is responsible for the collection and preparation of the sample for shipment in a sealed package which is then sent to an authorized SENASA national network laboratory for analysis. Sampling frequency is based on the production volume of each certified establishment. SENASA has requirements for VIS to take in response to a positive STEC test result from a government sample including documentation of noncompliance, verification of establishment corrective actions, and collection of follow-up samples. The FSIS auditors verified through interviews and review of records that VIS personnel are knowledgeable on actions to take in response to a positive STEC test result in accordance SENASA's requirements.

The FSIS auditors verified SENASA requires certified establishments to identify and determine the potential hazard and associated risks of STEC in their hazard analysis for raw beef products, in accordance with Circular No. 4210B. Certified establishments must define production lots and

be able to trace beef products from source animals through to the final packaging for export. SENASA requires certified establishments to develop a sampling plan for STEC in raw beef products exported to the United States to verify HACCP systems are working as designed. The FSIS auditors verified through interview and review of records that certified establishments have developed STEC sampling programs, VIS personnel review establishment STEC testing data, and verify corrective actions implemented by the establishment due to STEC positive test results.

The FSIS audit verification activities indicate that SENASA maintains the legal authority to implement its microbiological sampling and testing programs to ensure that products destined for export to the United States are unadulterated, safe, and wholesome.

X. CONCLUSIONS AND NEXT STEPS

An exit meeting was held by videoconference with representatives from SENASA May 24, 2023. During this meeting, the FSIS auditors presented the preliminary findings from the audit. An analysis of the findings within each component did not identify any deficiencies that represented an immediate threat to public health. The FSIS auditors identified the following findings:

GOVERNMENT STATUTORY AUTHORITY AND FOOD SAFETY AND OTHER CONSUMER PROTECTION REGULATIONS (e.g., INSPECTION SYSTEM OPERATION, PRODUCT STANDARDS AND LABELING, AND HUMANE HANDLING)

- During site visits at two certified establishments, the FSIS auditors observed that the SENASA officials did not have animals moved out of the pens to observe them in motion and from both sides in accordance with SENASA requirements. Instead, SENASA officials were performing visual inspection of the animals at rest and in motion within the pens. Additionally, government inspection personnel did not record a second signature on the slaughter authorization section of each pen card prior to releasing the animals for slaughter.

GOVERNMENT HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM

- During site visits at multiple certified establishments, the FSIS auditors observed that SENASA did not ensure that certified establishments were properly documenting HACCP monitoring as all records did not include the time and initials of the employee performing the monitoring procedure. Additionally, SENASA did not ensure that certified establishments pre-shipment review records included documentation of the review of critical limits for the indicated product.

During the audit exit meeting, SENASA committed to address the preliminary findings as presented. FSIS will evaluate the adequacy of SENASA’s proposed corrective actions and base future equivalence verification activities on the information provided.

APPENDICES

Appendix A: Individual Foreign Establishment Audit Checklists

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Swift Argentina S.A. Rosario	May 5, 2023	13	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
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Establishment Operations:	Est. 13 Beef slaughter and processing

60. Observation of the Establishment

There were no findings after consideration of extent, degree, and nature of all observations.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	05/05/2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Mattievich S.A. Carcaraña	May 12, 2023	89	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
57.	
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Establishment Operations:	Est. 89 Beef slaughter and processing

60. Observation of the Establishment

39-During the site visit, in the slaughter area of the establishment loose caulking was observed hanging from the ceiling, in addition a ceiling beam was missing one bolt exposing the inner surface. Observations were made prior to operations therefore no product affected.

22- During the site visit, establishment employees performing monitoring of CCPs did not sufficiently include times or their initials as part of the CCP record. Also, the calibration record did not include the time the procedure was performed.

14-During the establishment walk through, the lactic acid CCP spray cabinet was observed to have nozzles which were not properly functioning. After detecting that the lactic acid spray was not being effectively applied, all carcasses produced from the time the nozzles were last observed to be working properly were retained so the establishment could carry out their planned corrective actions.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	05/12/2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
S.A. Importadora Y Exportadora De La Patagonia Buenos Aires	May 8, 2023	189	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
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Establishment Operations:	Est. 189 Beef slaughter and processing

60. Observation of the Establishment

28; During the site visit, it was observed that the establishment had two instances of a generic *E. coli* test results in the unacceptable range; the establishment failed to perform a review of the process to determine a cause of the results, and SENASA did not recognize the establishment's failure to take action upon review of the results.

39, 45; During the site visit, peeling paint was observed on a wall in a carcass chilling cooler, no product was observed to be affected. Also, employee hand tools used for flipping switches of the overhead rail were observed to have open ends creating hard to clean surfaces which could result in residue buildup, no product observed to be affected, SENASA ensured tools were removed and corrective actions would occur.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	5-8-2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Friar S.A. Nelson	May 10, 2023	249	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

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

Establishment Operations:	Est. 249 Beef slaughter and processing

60. Observation of the Establishment

52-While observing the stunning of bovine the personnel checking for the effectiveness of stunning did not have a backup captive bolt gun readily available. After the observation was shared with establishment personnel, the backup captive bolt was placed in an area accessible to the plant employee who was verifying stunning effectiveness.

22-During the site visit, establishment employees performing monitoring of CCPs did not sufficiently include times or their initials as part of the CCP record.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	5-10-2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Quickfood S.A. San Jorge	May 11, 2023	1014	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	X
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
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Establishment Operations:	Est. 1014 Beef slaughter and processing

60. Observation of the Establishment

48-During the site visit, it was observed that a stainless steel bin was being used to collect inedible materials on the slaughter floor which was not marked or labeled in manner that would prevent the use of the container for edible products

46-During the site visit, on the rail housing immediately above the entrance of carcasses into the carcass intervention cabinet, it was observed that the area had accumulated grease and substances which could potentially allow for contamination with foreign material of the carcasses passing underneath that area. A plastic bag type of material was also tied to the rail on this area. The plastic material was also covered with a dark foreign material.

14-During the site visit, the hazard analysis did not identify the potential physical hazard of metal at a step where it was a hazard, also the hazard analysis did not adequately support decisions of the control of metal as a hazard.

22-Establishment employees performing monitoring of the zero tolerance CCP did not include the time the observation was made as part of the CCP record. Also, the establishment CCP for temperature control did not include calibration of process monitoring equipment as part of the written verification procedures.

14-During the establishment walk through, the first carcass half produced that day was observed to pass through the lactic acid intervention chamber without the application of lactic acid because the cabinet was not working. Production was stopped until the cabinet was working properly and the carcass half that had gone through the cabinet without receiving the lactic acid intervention was retained so the establishment could perform their prescribed corrective actions when this situation occurs.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	05/11/2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Marfrig Argentina Sociedad Anónima Villa Mercedes	May 12, 2023	1113	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance w ith req uirements. Use O if not applicable.

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

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	X
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	X
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
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Establishment Operations:	Est. 1113 Beef slaughter and processing

60. Observation of the Establishment

22; During the site visit, the CCP monitoring record for zero tolerance did not include the times of deviations observed by the monitor.

39, 41, 46; During the site visit, two instances of product falling from the production line in the cutting room were observed and in both instances the employees of the cutting room did not take action to inform quality control or supervision of the occurrence according to the requirements of establishment programs. Several chiller doorways were observed to have numerous small holes in the framework, and metal/plastic surfaces with gaps which were creating hard to clean areas that were observed to have residues. Also, water was observed to be dripping from overhead pipes in the chill cooler, with loose caulking hanging down from overhead pipes. SENASA took control actions to ensure product safety as needed.

54; During the site visit, it was determined that the SENASA veterinarian assigned to the establishment cattle pens did not always perform ante-mortem according to SENASA requirements. SENASA ante-mortem procedures requires animals received when a veterinarian is not on site, to be observed within a pen and the animals are to be moved out of the pen and back to allow observation of animals from both sides while in motion. The SENASA veterinarian indicated he did not always specifically observe all animals in motion or being moved prior to their official release for slaughter. Additionally, the auditor observed a pen card for a vacant pen as the animals had been released and subsequently slaughtered. The pen card in question had signatures that the animals were viewed, but there was no signature for the formal release of the pen for slaughter. Upon further review and discussion with SENASA employees in the conference room, the record in question could not be found or located and was unavailable for further review. In response, SENASA supervisory official downgraded the slaughtered animals and associated products originating from the pen in question for domestic use only to prevent their export eligibility for the United States.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	5-12-2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Frigorifico Rioplatense S.A.I.C.I.F. Buenos Aires	May 15, 2023	1920	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	X
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	X
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Periodic Supervisory Reviews	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	O
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Establishment Operations:	Est. 1920 Beef slaughter and processing

60. Observation of the Establishment

48-During the site visit, in the product reconditioning area, there was no inedible container for the collection of inedible material from the reconditioning process.

25-In the product storage area, product intended or eligible for export to the United States was not clearly identified to ensure separation by space and/or time.

39-During the site visit, a leaking overhead pipe was observed in the cutting room above a non-product area, in the frozen storage area, a small hole was observed leading to the outside

38-On the exterior of the building an accumulation of product residue and debris was observed in a drainage ditch along an outside wall of the building.

46-During observation of operations, on the rail out portion of the slaughter line, several carcasses were observed to be stacked together in the carcass trimming/reprocessing area creating congestion and the possibility of cross contamination.

14-During the site visit, it was observed that not all HACCP Plans included calibration of process monitoring equipment as part of the verification procedures where needed.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	05/15/2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Compania Bernal S.A. Quilmes	May 3, 2023	2062	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

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

Establishment Operations:	Est. 2062 Beef slaughter and processing

60. Observation of the Establishment

16, 18, 22; During the site visit, the metal detection CCP was observed to fail upon the auditor requesting placement of the metal check disk on top of product. It was observed that establishment CCP record keeping was not documented according to the establishments written monitoring procedure for the zero tolerance CCP. Also, it was observed that the establishment pre-shipment review record did not include documentation of the review of critical limits for the indicated product. SENASA officials took actions to ensure no affected product entered commerce.

38, 39, 41; During the site visit, water droplets were observed on a ceiling surface within the cutting room, no product observed to be affected. Also during the site visit, at the loading dock area, a hole was observed leading to the outside of the building which could potentially allow the entrance of pests and standing water accumulation was observed on the outside of the dock door which could attract pests, no evidence of pest activity was observed.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	5-3-2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Frigorífico Alberdi S.A. Oro Verde	May 8, 2023	2595	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

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

Establishment Operations:	Est. 2595 Beef slaughter and processing

60. Observation of the Establishment

46-During the site visit, dark grease was observed on a production belt and the outer frame of equipment, SENASA took action regarding the observation to ensure safety of any potentially affected products.

39-During the site visit a large gap was observed at the outside doors which could allow entrance of pests, no evidence of pest activity was observed.

14-During the site visit, hazard analysis did not identify the potential physical hazard of metal due to the mechanical cutting of the brisket and similar steps where metal equipment is used for the production process.

22-During the site visit, establishment employees performing monitoring of CCPs did not sufficiently include times or their initials as part of the CCP record.

57-During observation of SENASA N60 testing, the individual performing testing did not adhere to aseptic technique when donning gloves for the test collection process.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	05/08/2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Frigolar S.A. Abasto	May 15, 2023	3676	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

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

Establishment Operations:	Est. 3676 Beef slaughter and processing

60. Observation of the Establishment

No observations are noted related to operations, facilities, and food safety programs specific to this certified establishment as SENASA took enforcement action to suspend exports from this location on January 26, 2023, due to results of a routine CCA audit which identified the establishment's failure to meet HACCP and Humane Handling requirements.

54; During the site visit, it was determined that the SENASA veterinarian assigned to the establishment cattle pens did not always perform ante-mortem according to SENASA requirements. SENASA ante-mortem procedures requires animals received when a veterinarian is not on site, to be observed within a pen and the animals are to be moved out of the pen and back to allow observation of animals from both sides while in motion. The SENASA veterinarian indicated he performed oversight or overview of cattle while they were within a pen, then approve the cattle for slaughter, and would further observe the cattle walking in the chute to slaughter. Additionally, the auditor observed pen cards for animals which had been previously released and subsequently slaughtered. The pen cards had signatures that the animals were viewed, but there was no signature for the formal release of the pens for slaughter.

Note—After completion of the onsite portion of the audit, SENASA took further action to delist and remove eligibility of Est. 3676 Frigolar S.A. to export product to the United States with an effective date of May 22, 2023.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	5-15-2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Logros S.A. Rio Segundo	May 10, 2023	4069	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

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

Establishment Operations:	Est. 4069 Beef slaughter and processing

60. Observation of the Establishment

15, 20, 22; During the site visit, it was observed that establishment employees did not include times of CCP deviations for the zero tolerance CCP. The zero tolerance CCP records did not include adequate preventive measures for each occurrence of a deviation. Also, the establishment's pre-shipment review record did not include documentation of the review of critical limits for the indicated product.

28; During the site visit, it was observed that the establishment had several instances of a generic *E. coli* test results with more than three results in the marginal range; the establishment failed to perform and document a review of the process to determine a cause of the results, and SENASA did not recognize the establishment's failure to take action upon review of the results.

38, 39, 46, 47; During the site visit, a chill cooler doorway was observed to have residue buildup, and doorways had numerous small holes creating surfaces difficult to clean. A large number of flies were observed at several locations outside of the facility, with waste residue buildup locates below inedible handling pipes, and at an inedible product conveyor. During observation of sanitary dressing procedures, employees who were skinning hind legs were observed making opening cuts and then additional skinning cuts prior to washing or changing their knives, a practice that could potentially cause contamination of the carcass. Additionally, during the de-hiding process, an employee was observed handling the exterior surface of the hide, and then proceeding to use air knives for the skinning process prior to washing of their hands. SENASA officials took actions as appropriate to ensure disposition of affected product would occur.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	5-10-2023

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Azul Natural Beef S.A. Azul	May 4-5, 2023	5039	Argentina
	5. AUDIT STAFF		6. TYPE OF AUDIT
	OIEA International Audit Staff (IAS)		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

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

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

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

Establishment Operations:	Est. 5039 Beef slaughter and processing

60. Observation of the Establishment

16, 22; During the site visit, the hazard analysis did not identify the potential physical hazard of metal due to the mechanical cutting of the brisket and carcass sides with saws. Also, it was observed that establishment CCP record keeping for the zero tolerance CCP did not sufficiently include the times of monitoring as part of the record. No affected product was identified as a result of these findings.

38, 45; During the site visit, during observation of pre-operational inspection, plastic paddles used for directing meat were observed to have frayed pieces of plastic which could potentially come loose and be incorporated with product, no product was affected as the observation was prior to operations. Also, standing water accumulation was observed on the outside of the building near the waste loading area which could attract pests, no evidence of pest activity was observed.

61. AUDIT STAFF	62. DATE OF ESTABLISHMENT AUDIT
OIEA International Audit Staff (IAS)	5-4-2023, 5-5-2023

Appendix B: Foreign Country Response to the Draft Final Audit Report

FSIS audit from May 2 to May 24, 2023 to Argentina (FY2023)		
Component/observation	Competent authority's response /Evaluation */Information **needed***	Competent authority update
COMPONENT II During visits to two certified establishments, FSIS auditors observed that National Agri-Food Health and Quality Service (SENASA) officials were not removing animals from the pens to observe them in motion and from both sides, in accordance with SENASA requirements. Instead, SENASA officials were conducting a visual inspection of animals at rest and in motion inside the pens. In addition, government inspection personnel did not record a second signature on the slaughter authorization section of each pen card before releasing the animals for slaughter.	In response to this observation, the ACC prepared a document (AM procedure), which incorporates the integrated food safety and quality management system (SIGICA) with the paper records. Training is also provided to all Cycle I establishments that are authorized to export to the United States. This training took place from 31/07/2023 to 04/08/2023 and covered specific topics in which the aspects to be taken into account in the AM Inspection were established, taking the animals out of the corrals, to observe them in movement and from both sides, in accordance with the requirements established in Decree 4238/68. At the same time, the procedure was intensified in relation to the handling of the Card of pens to ensure the signature of the Official Veterinarian before sending the animals to slaughter.	- AM Procedure

FSIS audit from May 2 to May 24, 2023 to Argentina (FY2023)		
Component/observation	Competent authority's response /Evaluation */Information **needed***	Competent authority update
COMPONENT IV During visits to multiple certified establishments, FSIS auditors observed that SENASA did not ensure that certified establishments adequately documented HACCP monitoring as all records did not include the time or initials of the employee performing the monitoring procedure. In addition, SENASA did not ensure that certified establishments' pre-shipment review records included documentation of the critical limits review for the product indicated.	In response to the observation raised, the ACC drafts Service Order No. 02/2023 "HACCP: Requirements for Pre-Shipment Review of Products (Pre-Shipment)". And Service Order No. 03/2023 "Requirements for HACCP Plan Monitoring Records," which instructs VIS' how to verify that the establishment completes the pre-shipment review and properly document the HACCP plan monitoring including the time and initials of the person performing the monitoring.	- Service Order No. 02/2023 - Service Order No. 03/2023

BACKGROUND

A. According to Chapter X of Decree 4238/68, the VIS must examine and inspect all livestock prior to slaughter in order to determine if the animals meet the appropriate sanitary conditions to be slaughtered for human consumption. Consequently, if an establishment fails to present animals for ante-mortem inspection in accordance with Chapter X of Regulation of Products, by-products and derivatives of Animal Origin (hereafter referred to as D4238), the VIS that carries out the post-mortem inspection will not be able to determine that the carcasses are fit and therefore will not be able to allow the carcasses to be marked as "inspected and passed". There are certain animal health conditions that can only be assessed when the cattle are alive.

B. On December 30, 2015, SENASA published circular 4215 with an update of technical aspects related to ante and post mortem activities in primary processing plants (slaughterhouses) and processing establishments authorized by SENASA.

A. IVS PROCEDURES FOR IDENTIFYING, CONTROLLING AND RECORDING ANIMALS DURING ANTE-MORTEM INSPECTION.

1. The OV of the VIS should conduct the ante-mortem inspection, register the animals that **pass** the inspection and follow the instructions below to identify, control and register those animals that do not pass the ante-mortem inspection.
2. The OV shall inspect and approve animals determined to be healthy during ante-mortem inspection. [D4238 Chap.10.1]
3. The Official OV shall perform, at least once during the stay of the animals in the establishment, what is described in item 10.1.15 Ch. X. D4238.
   - 3.1. When the unloading is carried out in the presence of the OV, it shall comply with the provisions described in numeral 10.1.15 and shall be recorded in the corrals card.
   - 3.2. In case a VO is not present in the discharge, it shall be performed according to what is described in numeral 10.1.7.
   - 3.3. According to item 3.2 the VO must perform as described in numeral 10.1.15.
4. The OV must reject the animal or animals that are dead in the transport or pen, place the tag or red card on them for referral to the necropsy room. This livestock shall be recorded on the "necropsy room" form [4215. Part B (i.3)].
5. When an OV separates an animal for examination (at any of the stages provided for ante mortem inspection, it shall perform the following:
   - 5.1. Examine the animal and make one of the following final destination decisions for the separated animal:
     - 5.1.1. Approve it for the task, return with the corresponding troop;
     - 5.1.2. Do not approve it until the definition of the OV, in which case the animal must be identified with the white card (presumptive of infectious contagious disease) leaving it in the observed pen [see 4215. Part B (d)], the rest of the troop is intervened according to current regulations and the pen is identified [see 4215. Part B (e)], to the extent that the veterinarian determines the aptitude to approve it for slaughter,

5.1.3. Reject it for regular slaughter if a contagious disease is identified. In this case, the troop must be separated as a whole in the isolation pen for follow-up and analysis or referred to the necropsy room as determined by Chapter X of Decree 4238/68.

5.1.4. To reject it for regular slaughter, in the event of a non-contagious or non-infectious disease, but which by its nature represents a state of suffering in the animal, such as fractures, ambulatory difficulties, or of any other type, it must be destined for immediate emergency slaughter, placing a green card or tag and filling out the corresponding pink form.

5.1.5. Approve for slaughter at the end of the regular slaughter when the OV defines localized infectious diseases (abscesses, myiasis, infected wounds, mastitis, etc.) with risk of contaminating the slaughter yard. It is also an option to follow the same criteria of the previous section.

5.2. Record the livestock or separate animal used:

5.2.1. a pen card corresponding to animals approved for normal slaughter; or

5.2.2. the necropsy form (green paper) or emergency beach (pink paper) as appropriate.

5.2.3. Upload to the SIGICA system.

6. The OV should verify that the number of animals in the pens is recorded on the appropriate card. If livestock are removed from the pen (e.g., dead or separated livestock for examination by the OV), the OV should:

6.1. After the ante-mortem inspection is completed, the SIV must record on the pen card the time the inspection was performed (in case of observations, they must be described in the table inside the card) and sign the card.

6.2. Once the authorization to slaughter has been requested by the company, the ante mortem inspection will be carried out immediately before slaughter and will be authorized in the SIGICA system in view of the corresponding stamped card. It is understood that it is this stamped card where the authorization will be granted.

6.2.1. In case the slaughter is partial, the back side must be completed with the movement on the card and one of the die-cut cards of the stockyard card must be completed, registering the information in the SIGICA system in all cases [see image part B]. This die-cut card will be sent to the slaughter inspector.

6.2.2. Subsequently, when the remnants of the partially slaughtered troops are slaughtered, the authorization will be reloaded through the system and the card will be removed from the corral.

B. INTEGRATED FOOD AND FOOD QUALITY AND SAFETY MANAGEMENT SYSTEM (SIGICA)

It allows the management and registration of livestock entering slaughterhouses as well as the details derived from the slaughter of such animals (number of live animals, dead animals, fallen animals, kg produced, VIS interventions, findings and diseases detected).

1. LIVESTOCK INCOME:

Procedure:

1.1. The plant operator will designate operators identified with user and password before AFIP to operate in SIGICA to enter animals into the system;

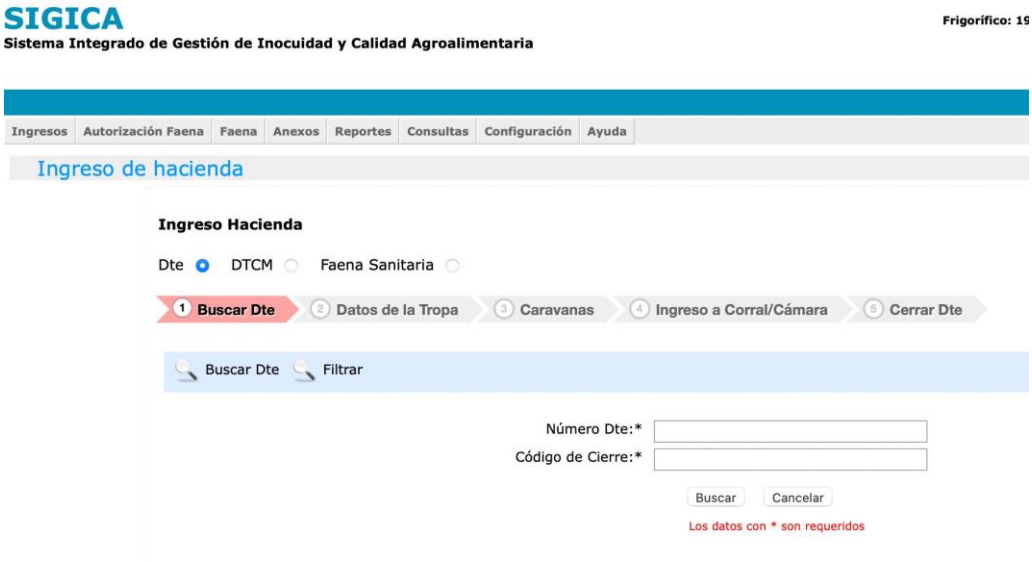
1.2. The facility enters the SIGICA upon arrival of the transport,

1.3. The closing code and DT-E number that appears on the document that covers the troop will be entered into the system. The system automatically displays all the data from the DT-E issued at origin;

1.4. There are mandatory loading data, so the system will not allow the loading process to continue if any of them is missing, for example, troop number, the date of entry to the plant, the number of animals entered standing, if there are fallen or dead animals, next step is to assign the pens where the animals were sent;

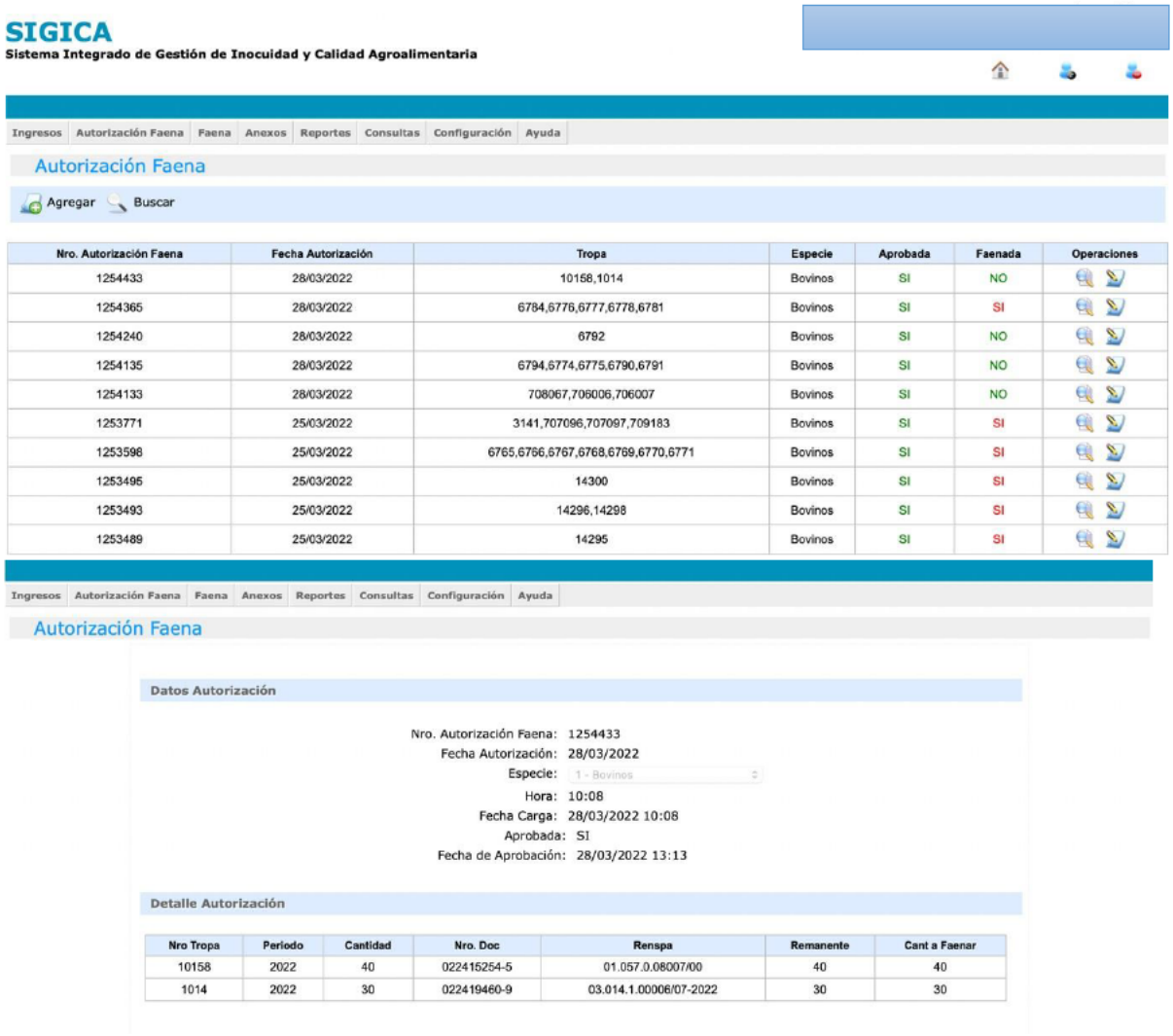
a) The number of the pen must be selected from the list, and then the number of animals to be sent to the pen must be specified;

b) Before each slaughter, once the troop has been entered into the system and before sending it to slaughter (either totally or partially), the plant personnel must load the **Slaughter Authorization.**



2. APPROVAL OF WORK

2.1. Once the company has issued the authorization request in the SIGICA system with the slaughter date, authorization number, list of troops and number of animals, the SIV enters the system with the password and user and analyzes the slaughter list.



2.2. The VIS analyzes the information:

2.2.1. Of the cards of corrals,

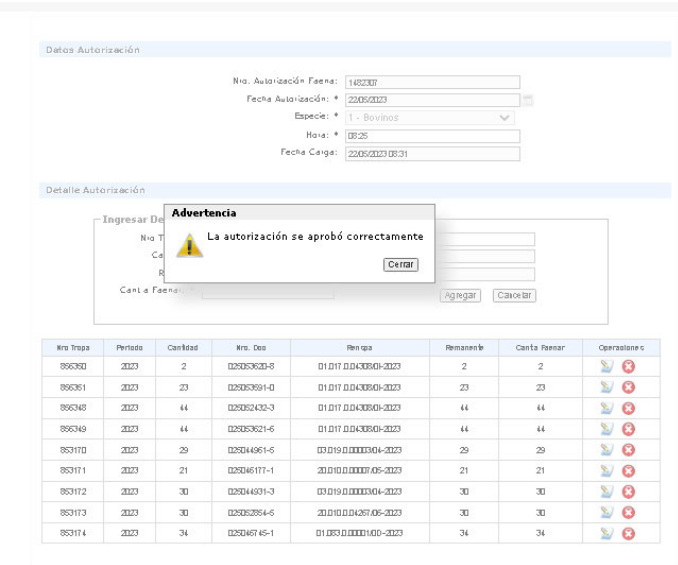
2.2.2. The DT-Es of the troops requested to slaughter.

2.2.3. All animals have passed the ante-mortem check.

2.2.4. That the troop is not intervened for any reason [point 6.2 of this document].

2.3. If no objections are found, click on **Approve job** in the system.

2.4. Once the "Authorization to Salughter" is approved, the troop or troops may enter the operation and the "Authorization" may be printed [See part A, point 4.4.1 of this document].



2.5. When printing the loaded "Authorization of slaughter" the system opens a window with the form that must be printed and signed according to the regulations in force.

2.6. The form must be printed in paper format and signed by the Veterinary Inspection Service. These documents must be kept on file in correlative form to be exhibited at the simple request of the competent authority.

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SERVICIO NACIONAL DE SANIDAD
Y CALIDAD AGROALIMENTARIA

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BUENOS AIRES, OCTOBER 12, 2023.

SERVICE ORDER NO. 02/2023

GENERAL COORDINATION OF TERRESTRIAL ANIMALS.

TOPIC: HACCP: Review requirements prior to product shipment (pre-shipment).

For the information of the personnel under their command and notification of the companies under their charge, the Thematic Coordinators are requested to instruct the Supervisors and Heads of Service of the bovine establishments to apply this service order before certifying export products as from today's date.

In accordance with the findings made by the FSIS audit team during the audit conducted from May 2 to 22 of the fourth equivalence component, the following service order was issued in relation to the pre-shipment review (pre-shipment).

As part of HACCP recordkeeping requirements, the VIS must verify that the establishment completes the pre-shipment review before the affected product enters the export circuit.

Check pre-shipment review requirements:

Prior to introduction for export, establishments should review the records associated with the processing of the product to ensure that the product complies with all critical limits and that corrective actions have been taken. All HACCP records, including prerequisite programs associated with the specific production, should be reviewed as part of the pre-shipment review.

The pre-shipment review is expected to be performed, dated and signed by a person who did not generate the HACCP records, *except in establishments with too few employees to achieve this result.*

The product can only be shipped when the facility completes the pre-shipment review. The facility may conduct the review in stages. Verification that the establishment has completed the pre-shipment review allows the VIS to know if the company assumed full and final responsibility for the application of HACCP controls to the product it produced.

When verifying HACCP implementation, the VIS should review the establishment's pre-shipment review records for the selected product to verify that the establishment is in compliance with the US requirement.

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The methods of verification of the VIS are those described in Circular 4301 (latest version in force), however, occasionally when verifying HACCP implementation, you should observe the establishment employee performing the pre-shipment review. This type of observation is particularly important in new establishments. Once the observation verification has been performed, this regulatory requirement can be verified using the record keeping component of the HACCP verification task.

One or more of the following findings provide evidence that the facility is not in compliance:
i. The establishment sends the product to the retailer without performing a pre-shipment review.
ii. The facility transports the product to another location prior to pre-shipment review and cannot demonstrate that it maintains control of the product.
iii. A facility employee does not sign and date the pre-shipment review.
iv. An establishment employee does not review the applicable HACCP records associated with the production covered by the pre-shipment review. The corresponding HACCP records generally include records of all monitoring activities, verification activities, corrective actions or prerequisite programs that were conducted during the production period covered by the pre-shipment review.

The VIS must determine non-compliance (Annex II Circular 4301 latest version in effect) if the pre-shipment review records do not identify the specific production to which it applies (e.g., product codes, lot codes, product name, production periods).

On the other hand, if the establishment guarantees compliance with all of the above, the VIS will record it in ANNEX V, point 8 of the "OFFICIAL PRE-SHIPMENT VERIFICATION", according to Circular 4301, latest version in force.

Therefore, establishments that, as part of the HACCP record keeping requirements, have a pre-shipment check list without the relevant information on CCP and their critical limits must update it within 30 days for the correct verification of the VIS.

Sincerely.

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BUENOS AIRES, OCTOBER 12, 2023.

SERVICE ORDER NO. 03/2023

GENERAL COORDINATION OF TERRESTRIAL ANIMALS.

TOPIC: HACCP: Requirements for HACCP plan monitoring records.

For the information of the personnel under their orders and notification of the companies under their charge, we request that the Thematic Coordinators kindly instruct the Supervisors and Service Chiefs of the bovine establishments to apply this service order as of today's date.

In accordance with the findings made by the FSIS audit team, in the audit conducted from May 2 to May 22 to component four of equivalence, the following service order related to the requirements for the review of HACCP plan monitoring records is conformed.

As part of the record keeping requirements of the HACCP plan, the VIS should verify that the establishment develops a record keeping system to document the actual situation, values and observations obtained during CCP monitoring.

The VIS is also required to verify that the establishment maintains records documenting the monitoring of CCPs and their critical limits, including actual times, temperatures or other quantifiable values; calibration of process monitoring instruments; corrective actions; verification procedures and results; and product names, codes, lots or other product identification.

In turn, it is required that each entry in the register must be made at the time the event occurs and must include the date and time; it must also be signed or initialed by the employee making the entry.

When verifying HACCP plan implementation, the VIS should review the establishment's records documenting the monitoring of CCPs and their critical limits; verification procedures and frequencies; and corrective actions taken in response to a deviation from a critical limit, a deviation not covered by a critical limit or an unforeseen hazard.

The VIS should also observe establishment employees performing record keeping procedures. The VIS should verify that the establishment's HACCP plan records comply with the regulatory requirements described above.

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When observing missing records, the VIS should carefully consider whether the record is missing because the facility employee did not perform the specified task or because the employee did not make the appropriate entry in the record.

If the VIS determines that the employee did not perform the specified procedure (monitoring, verification or corrective action), it must document the non-compliance in Annex II Circular 4301 (latest version in effect).

One or more of the following findings provide evidence that the facility is not in compliance with the above:

i. Facility employees do not make entries in HACCP records at the time specific events occur.
ii. The facility's records do not clearly indicate the date and time each entry was made.
iii. Establishment employees do not sign and initial their entries in HACCP records.

In the presence of any of these non-compliances, the SIV must register it in Annex II Circular 4301 (latest version in force).

Therefore, establishments that, as part of the HACCP plan monitoring requirements, have a record that does not include relevant CCP information, especially time and initials of the person doing the monitoring, should update it within 30 days for the correct verification of the VIS.

Sincerely.