



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250



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

Dear Dr. Amaya:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Argentina's meat inspection system September 5 through October 2, 2008. Argentina had no comments to the draft final report and a statement to that effect has been included as an attachment to the final report. Enclosed is a copy of the final audit report. We apologize for the delay in the submission of this report

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 205-3873, by facsimile at (202) 720-0676, or electronic mail at manzoor.chaudry@fsis.usda.gov.

Sincerely,

Manzoor Chaudry
Manzoor Chaudry, acting Director

Manzoor Chaudry
Deputy Director
International Audit Staff
Office of International Affairs

Enclosure

U. S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
OFFICE OF INTERNATIONAL AFFAIRS
INTERNATIONAL AUDIT STAFF
WASHINGTON, DC
202-205-3873
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FEB 10 2009

MEMORANDUM

TO: David Mergen, Agricultural Counselor
US Embassy, Buenos Aires
4300 Columbia
1425 Capital Federal
Buenos Aires, Argentina

FROM: Manzoor Chaudry
Deputy Director
International Audit Staff, OIA, FSIS, USDA

SUBJECT: FSIS FINAL AUDIT REPORT FOR ARGENTINA

Dear Mr. Mergen,

Please deliver the attached final audit report to Dr. Jorge Amaya, Presidente, Servicio Nacional de Sanidad y Calidad Agroalimentaria, Secretaria de Agricultura, Ganaderia, Pesca y Alimentación. Please contact me via email at manzoor.chaudry@fsis.usda.gov, if you have any further questions.

Best regards,

By Don Carlson, acting Director

For Manzoor Chaudry

cc list:

David Mergen, Agricultural Counselor, US Embassy, Buenos Aires
Jose Molina, Agricultural Attaché, Embassy of Argentina
OSTA/FAS
Hugh J. Maginnes, FAS Area Officer
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Yolande Mitchell, FCPS, OIA
AJ Ogundipe, IES, OIA
Argentina Country File

FSIS:OIA:IAS:DIRECTOR:202-205-3873:Argentina
FINAL AUDIT LETTER February 9, 2009

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

SEPTEMBER 5 THROUGH OCTOBER 2, 2008

**Food Safety and Inspection Service
United States Department of Agriculture**

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

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

1. INTRODUCTION

The audit took place in Argentina from September 5 through October 2, 2008.

An opening meeting was held on September 5, 2008, in Buenos Aires with the Central Competent Authority (CCA). In this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Argentina's meat inspection system.

The auditor was accompanied during the entire audit activities by representatives from the CCA, the National Service for Animal Health and Agro-Food Quality (SENASA), and representatives from the provincial offices and local inspection offices.

2. OBJECTIVE OF THE AUDIT

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

In pursuit of the objective, the following sites were visited: the headquarters of the CCA; one provincial office; two laboratories performing analytical testing on United States'-eligible product; one slaughter, fabrication, grinding, cooking, canning and extraction establishment; four slaughter, fabrication, and cooking establishments; one slaughter and fabrication establishment; two fabrication, grinding, and cooking establishments; two fabrication establishments; and one cold storage.

Competent Authority Visits			Comments
Competent Authority	Central	1	Buenos Aires
	Provincial	1	Santa Fe
	Local	11	Establishment level
Microbiological Laboratory		1	
Residue Laboratory		1	
Bovine Slaughter, Fabrication, Grinding, Cooking, Canning, and Extraction Establishment		1	
Bovine Slaughter, Fabrication, and Cooking Establishments		4	
Bovine Slaughter and Fabrication Establishment		1	
Bovine Fabrication, Grinding, and Cooking Establishments		2	
Bovine Fabrication Establishments		2	
Cold Storage		1	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in Argentina's inspection headquarters and in one provincial office. The third part involved on-site visits to eleven establishments: six slaughter/fabrication and/or further processing establishments, four fabrication and/or further processing facilities, and one cold storage. The fourth part involved a visit to two private laboratories; Laboratorios Litoral was conducting chemical analyses of field samples for residues, and FDC Labs was conducting microbiological analyses of field samples.

Program effectiveness determinations of Argentina's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP) and Sanitation Performance Standards (SPS), (2) animal disease controls, (3) slaughter/processing controls, including the implementation and daily operation of HACCP programs and testing programs for generic *Escherichia coli* (*E. coli*) and *Listeria monocytogenes* (*Lm*) and *Salmonella* in Ready-to-Eat Products, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella* species (*Salmonella*). Argentina's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health. The auditor also assessed how inspection services are carried out in Argentina and determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated, and properly labeled.

In the opening meeting, the auditor explained that Argentina's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Argentina. FSIS requirements include, among other things, daily inspection in all certified establishments, periodic supervisory visits to certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP, SPS, and testing programs for generic *E. coli*, *Salmonella*, and *Lm* and *Salmonella* in Ready-to-Eat Products.

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

- Residue Control System; equivalent as of 05/17/04.
- VIDAS *Salmonella* (SLM) Method; equivalent as of 02/08/08.
- VIDAS *Listeria monocytogenes* 11 (LMO2) Method for Ready-to-Eat Foods; equivalent as of 02/08/08.
- VIDAS *Listeria monocytogenes* (LIS) Method for Ready-to-Eat Foods; equivalent as of 02/08/08.

- VIDAS *Listeria* Species Xpress (LSX) Method for Ready-to-Eat Foods; equivalent as of 02/08/08.
- VIDAS *Salmonella* (ICS and Selective Plate (HE BS, SMID) Method; equivalent as of 02/08/08.
- VIDAS *Salmonella* (ICS and Selective Plate (HE BS, XLD) Method; equivalent as of 02/08/08.
- VIDAS *Salmonella* (ICS and *Salmonella* (SLM) Method Enzyme-linked Immunosorbent Assay (ELFA) Method; equivalent as of 02/08/08.

4. LEGAL BASIS FOR THE AUDIT

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

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

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address:
http://www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp

The following findings were reported in the August/September 2006 FSIS audit:

- HACCP- implementation deficiencies were found in three of the six establishments audited.

The following findings were reported in the July/August 2007 FSIS audit:

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

All deficiencies noted during the last FSIS audit had been addressed and corrected.

6. MAIN FINDINGS

6.1 Government Oversight

There were no major changes in the CCA organizational structure since the last FSIS audit. The implementation of the Regional concept for the more direct supervision of the

establishments producing agricultural products had been almost completed. All Regions were in operation. That one area that still had direct supervision from Buenos Aires was the establishments in the Buenos Aires Metropolitan area. Each Region had Thematic Coordinators which may be the direct supervisors of the in-plant SENASA personnel or may have supervisors under them. The Regional Directors report to a Regional Coordinator in Headquarters in Buenos Aires. The National Service of Animal Health and Agro-Food Quality (*Servicio Nacional de Sanidad y Calidad Agroalimentaria-SENASA*) has the responsibility for carrying out Argentina's meat inspection program including oversight and enforcement of the FSIS regulatory requirements in establishments certified to export to the United States.

6.1.1 Ultimate Control and Supervision

SENASA has ultimate control and supervision over its inspection program.

All payment of SENASA inspection personnel comes from the Argentine government.

6.1.2 Assignment of Competent, Qualified Inspectors

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

The training programs given in 2007 and 2008 included courses given in Buenos Aires, at colleges and universities, and in local venues. Course topics included various types of computer training, animal diseases and animal health, administration, leadership, and management, epidemiology, virology, immunology, the World Trade Organization, English, inspection basics, Good Manufacturing Practices and Standard Operating Procedures, ante-mortem and post-mortem examination, HACCP, the national residue program, auditing, food microbiology, foodborne diseases, Bovine Spongiform Encephalopathy and other transmissible encephalopathies, and traceability.

- In one establishment, the SENASA inspector assigned to kidney inspection was not inspecting some of the kidneys presented.

6.1.3 Authority and Responsibility to Enforce the Laws

SENASA has the legal authority and the responsibility to enforce U.S. requirements.

6.1.4 Adequate Administrative and Technical Support

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

- The request for equivalence for the use of private laboratories was written and awaiting signature before submission to the International Equivalence Staff, FSIS.

6.2 Headquarters Audit

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

- Internal review reports;
- Supervisory visits to establishments that were certified to export to the United States;
- Training records for inspectors and laboratory personnel;
- New laws and implementation documents such as regulations, notices, directives and guidelines;
- Sampling and laboratory analyses for residues;
- Sanitation, slaughter and processing inspection procedures and standards;
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials;
- Export product inspection and control including export certificates, and
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

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

6.3.1 Audit of Regional and Local Inspection Sites

The auditor interviewed personnel in one Regional Office in the city of Santa Fe for the Province of Santa Fe. No concerns arose as a result of that interview.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited a total of eleven establishments. One was a slaughter, fabrication, grinding, cooking, canning and extraction establishment; four were slaughter, fabrication, and cooking establishments; one was a slaughter and fabrication establishment; two were fabrication, grinding, and cooking establishments; two were fabrication establishments; and one was a cold storage. None of the establishments were delisted. One establishment received a Notice of Intent to Delist (NOID).

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

8. LABORATORY AUDITS

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

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

The following laboratory was audited:

- Laboratorios Litoral, located in Rosario, Santa Fe. This is a private laboratory which conducts residue testing for the National Residue Program.

No deficiencies were reported.

Microbiological laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test United States' samples, the auditor evaluates compliance with the criteria established for the use of private laboratories under the FSIS Pathogen Reduction/HACCP requirements.

The following laboratory was audited:

- FDC Labs located in Buenos Aires, Buenos Aires. This is a private laboratory which conducts microbiological sampling for both SENASA-based sampling programs and also samples sent by establishments.

No deficiencies were reported.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditor focused on five areas of risk in assessing an exporting country's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of establishments, Argentina's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

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

9.1 Sanitation Standard Operating Procedures

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States domestic inspection program. The SSOPs in nine of the ten audited establishments required to have an SSOP were found to meet the basic FSIS regulatory requirements.

- Six of these ten establishments audited had deficiencies reported in SSOP, primarily in implementation and recordkeeping.

9.2 Sanitation Performance Standards

- Six of the eleven establishments audited had deficiencies reported in SPS. These included ventilation, light intensity, equipment and utensils, and sanitary operations.

10. ANIMAL DISEASE CONTROLS

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

No deficiencies were reported.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

Argentina is not eligible to export fresh ruminant meat to the United States because APHIS does not consider Argentina free of Foot-and-Mouth Disease.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include the following areas: humane handling and humane slaughter; ante-mortem inspection and disposition; post-mortem inspection and disposition; implementation of HACCP systems in establishments, and implementation of a generic *E. coli* testing program in slaughter establishments and *Lm* and *Salmonella* testing in Ready-to-Eat Products.

The controls also include ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

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

11.1 Humane Handling and Slaughter

Humane slaughter deficiencies were observed in two of the six slaughter establishments audited.

- In one establishment, humane handling records of SENASA showed at least one observation per week for the past several weeks that there was a palpebral reflex present on at least one of the 5-10 cattle observed per day. Corrective actions were recorded at each event. However, preventive measures obviously have not been effective and there has been no further follow-up.
- In one establishment, the auditor and SENASA officials watched the stunning of five animals. The equipment being used was a pneumatic captive-bolt stunner. The first animal required two applications of the stunner, the second, third, and fourth animals received one application. The fifth animal required three applications. SENASA immediately took control of the situation. There were only a few animals left to be stunned. These animals were stunned using the back-up electrical stunning system. SENASA will require use of the electrical system until the other can be repaired. No problem had been noted in the humane handling verification from earlier in the day.

11.2 HACCP Implementation.

All establishments approved to export meat products to the United States are required to have developed and adequately implemented a HACCP program except cold storages which handle no exposed product. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of all of the ten audited establishments required to have a HACCP program.

- One establishment had a deficiency reported in Basic HACCP.
- All ten establishments audited had deficiencies reported in HACCP implementation, primarily in the areas of monitoring, verification, corrective actions and/or preventive measures, and recordkeeping.

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

11.3 Testing for Generic *E. coli*

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

Six of the eleven establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in four of the six slaughter establishments. Statistical process control techniques had been developed in all the slaughter establishments in order to evaluate the results.

- Two of the six establishments audited had deficiencies in the selection of carcasses for sampling for generic *E. coli* and/or in their records of sampling, analysis, and results.

11.4 Testing for *Listeria monocytogenes* and *Salmonella* in Ready-to-Eat Product

Four of the eleven establishments audited were producing ready-to-eat products for export to the United States. Three more establishments were conducting cooking operations with an audit by APHIS for approval for export of these products to the United States scheduled for October 2008. Testing for *Listeria monocytogenes* (*Lm*) and *Salmonella* was being done for the "tube" products six times a year. Testing for *Lm* and *Salmonella* for the cooked, dried products was being done at the request of that establishment, on every lot produced for export.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

Argentina's National Residue Testing Plan (Plan CREHA) for 2008 was being followed and was on schedule.

13. ENFORCEMENT CONTROLS

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

13.1 Daily Inspection

Inspection was being conducted daily in all the establishments audited.

13.2 Testing for *Salmonella* species

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

Six of the eleven establishments audited were required to meet the basic FSIS regulatory requirements for testing for *Salmonella* species and were evaluated according to the criteria employed in the United States' domestic inspection program.

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

13.3 Species Verification

Species verification was being performed as required.

13.4 Periodic Supervisory Reviews

In all establishments visited, periodic supervisory reviews of were being performed and documented as required.

13.5 Inspection System Controls

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

No livestock or meat was imported from other countries for use in U.S.-eligible product.

Adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Some inspection controls at all levels were not fully developed and implemented.

- Some in-plant SENASA inspection system personnel were not fully aware of the content of the SSOP and HACCP plans of the establishments.

14. CLOSING MEETING

A closing meeting was held on October 2, 2008, in Buenos Aires with the CCA. At this meeting, the preliminary findings were presented by the auditor.

The CCA understood and accepted the findings.

Rori K. Craver, DVM
Senior Program Auditor

A handwritten signature in black ink that reads "Rori K. Craver DVM". The signature is written in a cursive style and is positioned to the right of the typed name.

15. ATTACHMENTS

Individual Foreign Establishment Audit Forms
Foreign Country Response to Draft Final Audit Report (when it becomes available)

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Surmar Carne Argentina Timoteo Gordillo 2421 (C1440EEW) BA	2. AUDIT DATE 12 Sept 2008	3. ESTABLISHMENT NO. 2685	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Surmar Carne Argentina
Timoteo Gordillo 2421
(C1440EEW) BA
Argentina
Est. 2685
12 Sept. 2008
[03C – indirect export]

22/51 In the HACCP monitoring form for CCP 2, there was no place for the initials of the monitor at the time of the monitoring event. [Regulatory references: 9 CFR § 416.16, 17, 417.5, 8]

41. Condensate was dripping from the ceiling and refrigeration units onto boxes in one box cooler. SENASA took immediate control of the cooler and the product. [Reg. ref.: 9 CFR § 416.2(d)]

61. NAME OF AUDITOR
Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE

Rori K. Craver 12 Sept 08

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Consignaciones Rurales A Division of JBS Swift Nicolas Videla 1721 Berazategui, BS. AS.	2. AUDIT DATE 8 Sept 2008	3. ESTABLISHMENT NO. 1378	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Consignaciones Rurales
A Division of JBS Swift
Nicolas Videla 1721
Berazategui, BS. AS.
Argentina
Est. 1378
8 Sept. 2008
[03C, 03J – indirect export]

13/22/51 Descriptions of non-compliances, corrective actions, and preventive measures were insufficient to allow for verifications of the actions by SENASA personnel. [Regulatory references: 9 CFR § 416.16, 17, 417.5, 8]

61. NAME OF AUDITOR
Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE

Rori K. Craver DVM 8 Sept 08

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Swift Armour S.A. Argentina Av. J. D. Peron S/N V. Godor. Galvez, Rosario, Santa Fe S2124IUA	2. AUDIT DATE 18-19 Sept 08	3. ESTABLISHMENT NO. 13	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Est #: 13 (Swift Armour S.A. Argentina [S/P/CS]) (V. Godor. Galvez, Santa Fe, Argentina)

○ Swift Armour S.A. Argentina
Av. J. D. Peron S/N
V. Godor. Galvez,
Rosario, Santa Fe S2124IUA
Argentina
18-19 September 2008

19/22/51. The thermometer calibration plan and records were not clear as to which values represented those of the reference thermometers and those values which were from the thermometers being calibrated. [Regulatory references: 9 CFR § 417.4, 417.8]

22/51. The flow diagrams for the HACCP plans did not show the receipt or storage of packaging materials. [Reg. ref. 9 CFR § 417.5, 417.8]

25/51. Many carcasses in the coolers did not have legible inspection stamps. [Reg. ref.: 9 CFR § 316.9]

○
61. NAME OF AUDITOR
Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE

Rori K. Craver 19 Sept 08

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

ESTABLISHMENT NAME AND LOCATION Quickfood – Marfrig Group Fondo de la Legua 1690 (B 1640 EDV) Martinez Prov. Buenos Aires	2. AUDIT DATE 29 Sept 2008	3. ESTABLISHMENT NO. 18	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Quickfood – Marfrig Group
Fondo de la Legua 1690
(B 1640 EDV) Martinez
Prov. Buenos Aires
Argentina
29 Sept 2008
Establishment 18
[03B, 03C, 03G]

13/51. SSOP records did not include product contact surfaces as a consideration for operational sanitation monitoring although these surfaces did occur in the SSOP operational sanitation plan. [Regulatory references: 9 CFR § 416.16, 416.17]

15/22/51. The HACCP plan did not list the number of packages to be sampled at the cooking temperature CCP. The establishment stated that this would be three samples, but not all temperatures would be recorded, only the lowest one. [Reg. ref.: 9 CFR § 417.2(c)(4), 417.5, 417.8]

41/51. There was frozen condensate present on the ceilings and around the doors of several freezers. There was also ice on the tops of some boxes in the freezers but it was not possible to determine if the ice had formed in these freezers or if the boxes of meat had been received in that manner. [Reg. ref.: 9 CFR § 416.2(d)]

46. Box opening procedures allowed for potential contact between the outside of the boxes and the primary packaging followed by contact to the product when removed from the primary packaging. [Reg. ref.: 9 CFR § 416.4]

61. NAME OF AUDITOR

Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE

Rori K. Craver DVM 29 Sept 08

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

ESTABLISHMENT NAME AND LOCATION VersaCold Logistics Argentina Calle No. 2 y 9 S/N Parque Industrial de Pilar Ruta 8 km. 60, B1629MYA Pilar, BA	2. AUDIT DATE 9 Sept 2008	3. ESTABLISHMENT NO. 152	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

VersaCold Logistics Argentina

Calle No. 2 y 9 S/N

Parque Industrial de Pilar

Ruta 8 km. 60, B1629MYA Pilar, BA

Argentina

9 Sept. 2008

[Est. 152 - cold storage - all exports go under the name of the producing establishment]

There were no significant findings to report at this establishment after consideration of the nature, extent, and degree of the observations. There is no handling of open product at this establishment.

61. NAME OF AUDITOR

Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE

Rori K. Craver DVM 9 Sept 08

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

ESTABLISHMENT NAME AND LOCATION Frigorifico HV S.A. Paso 3030 (1752) L. del Mirador, BS. AS	2. AUDIT DATE 15 Sept 2008	3. ESTABLISHMENT NO. 1237	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Frigorifico HV S.A.
Paso 3030
(1752) L. del Mirador,
BS. AS
Argentina
Est. 1237
15 Sept. 2008
[03C – indirect export]

19/51 The program for calibration of thermometers was confusing regarding how to calculate the adjusted values thereby making it possible that the values recorded for the CCPs might be miscalculated. [Regulatory references: 9 CFR § 417.4, 8]

20/51 No preventive measures were included in the HACCP plan for CCP 1. [Reg. ref.: 9 CFR § 417.3, 8]

22/51 In the records for CCP 2, there were no times or initials of the monitor recorded at the time of the monitoring events. The values that were recorded were not the actual values from the thermometers, but an adjusted value. [Reg. ref.: 9 CFR § 417.5, 8]

61. NAME OF AUDITOR

Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE

Rori K. Craver DVM 15 Sept 08

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Establecimientos Friar Monsenor Zaspé 3648 S3000CYB Santa Fe, Santa Fe	2. AUDIT DATE 17 Sept. 2008	3. ESTABLISHMENT NO. 1311	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Establecimientos Friar
Monsenor Zaspé 3648
S3000CYB
Santa Fe, Santa Fe
Argentina
17 Sept 2008
Establishment 1311
[03B, 03C, 03G]

18/51. Several critical limits listed in the HACCP plans did not match what was actually being monitored during operations. [Regulatory references: 9 CFR § 417.2, 417.8]

22/51. The records for cooking did not document the actual times as recorded on the cooking cards. These records also did not have the initials of the monitor at the time of the event. Some times were filled out before the event as the anticipated time of the event.

The flow diagram and the hazard analysis did not show the receipt and storage of packaging materials and non-meat ingredients. [Reg. ref.: 9 CFR § 417.5, 417.8]

41/51. There was significant frozen condensate in the freezing chamber designated for frozen cooked beef (CCC). [Reg. ref.: 9 CFR § 416.2(d)]

61. NAME OF AUDITOR

Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE

Rori K. Craver 17 Sept 08

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

ESTABLISHMENT NAME AND LOCATION Frigorifico Lafayette s.a. Ruta 210 km 46,500 Alejandro Korn (CP 1864), Partido de San Vicente, Buenos Aires,	2. AUDIT DATE 10 Sept 2008	3. ESTABLISHMENT NO. 1352	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Frigorifico Lafayette s.a.
 Ruta 210 km 46,500
 Alejandro Korn (CP 1864),
 Partido de San Vicente,
 Buenos Aires,
 Argentina
 Est. 1352
 10 Sept. 2008

[03C, 03J – indirect export; 03G at present not for US, but APHIS audit is coming in October]

10/51. In the entry to the boning area, the carcasses came up on a rail system from the floor below. This allowed only a small space between the neck of the carcasses and the floor. At one point, a carcass had a piece of meat extending from the neck and this contacted the floor. An establishment employee went to trim this off and in the process, had his hook contact the floor. He proceeded back to his position on the line and began to use the hook in other carcasses without washing or sterilizing it. By the time the line was stopped, at least five other carcasses had contact with that hook and the conveyor belt going from there to the next boning position. There was confusion about how to clean and one of the cleaning personnel ended up re-contaminating the area he was cleaning by picking up meat scraps off the floor, putting it back on the floor, and then grabbing the support of the table with the hand that had just touched the floor and then using that hand on the top of the table to help himself stand. The end of the table was re-cleaned again. There was also confusion on what to do with the product that may have been contaminated and needed to be held for disposition. After that product was removed from the room for a decision regarding disposition, there was again confusion regarding whether or not that table that held the product also needed to be cleaned. [Regulatory references: 9 CFR § 416.13, 416.17]

13/51. Operational sanitation records from the 20th, 21st and 22nd of August had a number of inconsistencies including one that said all areas were deficient, but no further action or descriptions were included and the records were signed off for the day. Another had no operational sanitation recorded but there was production that day and the other only had one observation of operational sanitation when there was a full day of production. [Reg. ref.: 9 CFR § 416.16, 416.17]

13/22/51. Descriptions of non-compliances, corrective actions, and preventive measures were insufficient to allow for verifications of the actions by SENASA personnel. [Reg. ref.: 9 CFR § 416.16, 17, 417.5, 8]

18/22/51. In the HACCP plan for the CCP for the metal detector, the critical limits were listed as the probes' detection values, but the records for monitoring recorded the functionality of the metal detector. [Reg. ref.: 9 CFR § 417.2, 417.5, 417.8]

22/51. Monitoring records for the CCP in boning did not follow the frequency stated in the HACCP plan and did not explain the reason on the records. [Reg. ref.: 9 CFR § 417.5, 417.8]

46. The establishment employee working at the second gutter position was using the boot shield as a step instead of keeping his boots behind it. That brought the boot in very close proximity to carcasses being eviscerated. [Reg. ref.: 9 CFR § 416.4]

52/51. Humane handling records of SENASA show at least one observation per week for the past several weeks that there was a palpebral reflex present on at least one of the 5-10 cattle observed per day. Corrective actions were recorded at each event. However, preventive measures obviously have not been effective and there has been no further follow-up. [Reg. ref.: 9 CFR § 313.2(f)]

55/51. The SENASA inspector assigned to kidney inspection was not inspecting some kidneys. [Reg. ref.: 9 CFR § 9 CFR 310.1(a)]

58. After consideration of the findings, SENASA officials provided the establishment with a Notice of Intent to Delist (NOID). The establishment has 30 days to correct the deficiencies. SENASA will perform a verification of these corrective actions by day 31 and will delist the establishment if the corrective actions are not completed or effective.

61. NAME OF AUDITOR
 Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE

Rori K. Craver 10 Sept 08

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

ESTABLISHMENT NAME AND LOCATION Swift Armour S. A. Ruta 33 Km 632 (2600) Venado Tuerto Prov. Santa Fe	2. AUDIT DATE 22 Sept 2008	3. ESTABLISHMENT NO. 1373	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

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

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

60. Observation of the Establishment

Swift Armour S. A.
Ruta 33 Km 632
(2600) Venado Tuerto
Prov. Santa Fe
Argentina
Establishment 1373
22 Sept 2008
[03C, 03G, 03J]

10. On the slaughter floor, the method used by the establishment employee to remove heads and place them on the head chain resulted in an occasional tongue or head trimmings contacting the floor or his boots. Appropriate and immediate corrective actions were ordered by the local SENASA officials. [Regulatory references: 9 CFR § 416.13]

13/51. SSOP records of preventive measures frequently only mentioned telling someone to do something rather than the measures that were actually taken. [Reg. ref.: 9 CFR § 416.16, 416.7]

22/51. There were gaps in the HACCP monitoring records for CCP2 in boning. There were no explanations recorded for these gaps. [Reg. ref.: 9 CFR § 417.5, 417.8]

28/51. Only one side of a carcass was ever chosen for sampling, the right side. Therefore, not all carcass halves had an equal opportunity to be chosen for sampling. [Reg. ref.: 9 CFR § 310.25]

29/51. Records showed the date of slaughter, the date of sampling, and the analysis date as the same date, but the program called for a waiting period before sampling which would allow for adequate chilling of the carcasses. [Reg. ref.: 9 CFR § 310.25]

40/51. There was inadequate lighting in the head inspection area where the inspector chose to inspect tongues. The establishment immediately changed the way tongues were presented. [Reg. ref.: 9 CFR § 416.2(c)]

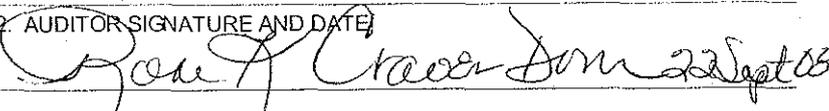
41/51. The freezer had frozen condensate over cartons. Appropriate immediate corrective actions were taken. [Reg. ref.: 9 CFR § 416.2(d)]

45/51. The rubberized material coating the rollers on the head inspection rail above the heads was *flaking and crumbling*. [Reg. ref.: 9 CFR § 416.3]

61. NAME OF AUDITOR

Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE



Rori K. Craver
22 Sept 08

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Rafaela Alimentos S. A. Ruta 33, km 744 2170 Casilda, Santa Fe	2. AUDIT DATE 23 Sept 2008	3. ESTABLISHMENT NO. 1399	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Rafaela Alimentos S. A.
Ruta 33, km 744
2170 Casilda, Santa Fe
Argentina
Establishment 1399
23 Sept 2008
[03C, 03G, 03J]

7/13/51. There was no frequency written into the SSOPs for operational sanitation monitoring. The establishment officials said it was three times per day, but the records had instances of once, twice and three times with no explanations for the variation. The descriptions of non-compliances, corrective actions, and preventive measures did not contain sufficient detail to allow for verification by QA supervisors and SENASA personnel. [Regulatory references: 9 CFR § 416.12, 416.16, 416.17]

22/51. Flow charts did not include the reception and storage of packaging materials and non-meat ingredients. The monitoring records for CCP 4 for stabilization did not record the correct parameters as stated in the HACCP plan for cooked frozen beef products. [Reg. ref.: 9 CFR § 417.5, 417.8]

28/51. The selection of carcasses for sampling did not include one for each 300 animals slaughtered in a day, but rather one steer and one cow/bull. [Reg. ref.: 9 CFR § 310.25]

61. NAME OF AUDITOR

Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE

Rori K. Craver DVM 23 Sept 08

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Sadowa Sociedad Anonima Av. Constitucion 10300 7600 Mar del Plata Buenos Aires,	2. AUDIT DATE 11 Sept 2008	3. ESTABLISHMENT NO. 1921	4. NAME OF COUNTRY Argentina
	5. NAME OF AUDITOR(S) Rori K. Craver, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

60. Observation of the Establishment

Sadowa Sociedad Anonima
Av. Constitucion 10300
7600 Mar del Plata
Buenos Aires
Argentina
Establishment 1921
11 Sept. 2008
[03C, 03G, 03J – indirect export]

10. There was condensate dripping onto one carcass in the carcass cooler. SENASA took immediate control of the carcass and the cooler. [Regulatory references: 9 CFR § 416.13]

22/51 HACCP records for CCP 6, stabilization, did not contain the actual times of measurements, but only 30 minute intervals and the beginning time of the stabilization. The HACCP plan and record for the CCP for trimming calls for three samples for temperature, only the results of one were recorded. [Reg. ref.: 9 CFR § 417.5, 8]

45. One metal container used for the meat intended for the cooked product had cracks in the welding which could allow for the formation of biofilms. SENASA ordered immediate transfer of the product to another container and gave assurances that all of the stock of containers would be examined and those in bad condition would be removed from service until they can be repaired or replaced. [Reg. ref.: 9 CFR § 416.3]

52. The auditor and SENASA officials watched the stunning of five animals. The equipment being used was a pneumatic captive-bolt stunner. The first animal required two applications of the stunner, the second, third, and fourth animals received one application. The fifth animal required three applications. SENASA immediately took control of the situation. There were only a few animals left to be stunned. These animals were stunned using the back-up electrical stunning system. SENASA will require use of the electrical system until the other can be repaired. No problem had been noted in the humane handling verification from earlier in the day. [Reg. ref.: 9 CFR § 313.2(f)]

61. NAME OF AUDITOR
Rori K. Craver, DVM

62. AUDITOR SIGNATURE AND DATE

Rori K. Craver 11 Sept 08

Comments to the Draft Final Report for ARGENTINA:

The government of Argentina states that they have no comments to the Draft Final Report.