



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

SEP 30 2003

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

Dear Dr. Amaya:

The Food Safety and Inspection Service has completed an on-site audit of Argentina's meat inspection system. The audit was conducted from February 27 through April 3, 2003. Comments from Argentina have been included in the final report. Enclosed is a copy of the final audit report.

If you have any questions regarding the audit or need additional information, please contact me by telephone at 202-720-3781, by facsimile at 202-690-4040, or by email at sally.stratmoen@fsis.usda.gov.

Sincerely,

Sally Stratmoen
Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc: Robert Hoff, Counselor, U.S. Embassy, Buenos Aires
Jose Molina, Agricultural Attaché, Embassy of Argentina
Linda Swacina, Deputy Administrator, FSIS
Jeanne Bailey, FAS Area Officer
David Young, ITP, FAS
Sally Stratmoen, Director, IES, OIA
Karen Stuck, Assistant Administrator, OIA
Donald Smart, Director, Review Staff, OPEER
Clark Danford, Director, IEPS, OIA
Nancy Goodwin, IES, OIA
Amy Winton, State Department
Country File-Argentina (Audit Feb03)

FINAL

SEP - 2 2003

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

FEBRUARY 27 THROUGH APRIL 3, 2003

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 – Servicio Nacional de Sanidad y Calidad Agroalimentaria (SENASA).
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
SSOP	Sanitation Standard Operating Procedures
<i>E. coli</i>	<i>Escherichia coli</i>
<i>Salmonella</i>	<i>Salmonella</i> species

1. INTRODUCTION

The audit took place in Argentina from February 27 through April 3, 2003.

An opening meeting was held on February 27, 2003, in Buenos Aires, with the Central Competent Authority (CCA). At this meeting, the auditors confirmed the objective and scope of the audit, the auditors' itinerary, and requested additional information regarding government oversight needed to complete the audit of Argentina's meat inspection system.

The auditors were accompanied during the entire audit by representatives from the CCA, Servicio Nacional de Sanidad y Calidad Agroalimentaria, the Argentinean Food Inspection Agency (SENASA).

2. OBJECTIVE OF THE AUDIT

This was a routine annual audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter 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 SENASA, four laboratories performing analytical testing on United States-destined product, 15 meat slaughter and processing establishments, and two meat processing establishments.

SENASA Visits	Central	4
	Regional	0
Laboratories		4
Meat Slaughter Establishments		15
Meat Processing Establishments		2

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss government oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters regarding government staffing. The third part involved on-site visits to 17 establishments: 15 slaughter establishments and two processing establishments. The fourth part involved visits to one government and three private laboratories. The government laboratory (SENASA Central Laboratory) along with two of the private laboratories (Litoral S.A. Laboratorio and Swift Armour S.A. Laboratorio) were conducting analyses of field samples for the presence of generic *Escherichia coli* (*E. coli*), *Salmonella* species (*Salmonella*), and *Listeria monocytogenes*. The other private

laboratory, Xenobiotics SLR, was conducting only chemical analyses of various compounds on field samples for the Argentinean national residue control program.

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's), (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs and a testing program for generic *E. coli*, (4) residue controls, and (5) enforcement controls, including a testing program for *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 by Argentina and determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated, and properly labeled.

In the opening meeting, the auditor explained that Argentina's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations that have been made for Argentina. FSIS requirements include, among other things, daily inspection in all certified establishments, monthly 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 and SSOP's, and testing for generic *E. coli* and *Salmonella*.

Equivalence determinations are those that have been made by FSIS for Argentina under provisions of the Sanitary/Phytosanitary Agreement. Currently, there are no equivalence determinations for Argentina.

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.) and 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 www.fsis.usda.gov/oyo/tsc.

The following deficiencies were identified during the FSIS audit of Argentina's inspection system conducted in March/April 2001:

- Reduced supervisory reviews were observed in one province.
- Poor sanitary dressing and sanitizing procedures were observed in several establishments.

The following deficiencies, which were observed during the audit of the Argentinean meat inspection system conducted in May/June 2002, were found to have been corrected by the time of this audit in March 2003:

- The HACCP plans had no CCP regarding fecal zero tolerance in seven of the audited establishments.
- Cross contamination was observed in five establishments.
- In five establishments, the hazard analysis in the HACCP plan was incomplete and there were no pre-shipment review records.
- In one establishment, there was no one trained in HACCP.

6. MAIN FINDINGS

6.1 Government Oversight

In the SENASA headquarters in Buenos Aires, the CCA has a Director and two coordinators for meat inspection. There are also 14 area supervisors in different geographic locations. Together they oversee all inspection activities. In order to gather more information on oversight, interviews were conducted with the officials responsible for:

- Field operations and inspection services
- Export programs and U. S. regulations
- Enforcement and compliance
- Government staffing

There are 55 veterinarians and 191 food inspectors, employed and paid by SENASA, assigned to establishments certified to export to the United States. In addition, there are 90 food inspectors that are paid by the establishments that are also assigned to establishments certified for export to the U.S.

6.1.1 CCA Control Systems

An official of the CCA on the Buenos Aires headquarters staff and two supervisors oversee the maintenance of eligibility of establishments to export to the United States. These supervisors have the authority, under Argentinean regulations, to enforce the necessary requirements to export to a country. Their duties also include initiating investigations into failure on the part of an establishment to meet the standards of the importing country and to delist those establishments that fail in this requirement.

6.1.2 Ultimate Control and Supervision

Control in both slaughter and processing establishments is accomplished by the Veterinarian-in-Charge. Overall control and supervision is the responsibility of the headquarters office in Buenos Aires. Permits to export to other countries are granted or withdrawn by the headquarters office.

6.1.3 Assignment of Competent, Qualified Inspectors

Ensuring adequate training of inspectors before assignment to a position is the responsibility of the headquarters staff. There are trainers in the subject of export requirements, and in-plant staff involved with export duties receive the necessary special training. However, the training does not appear to be carried out by the CCA on a routine basis.

6.1.4 Authority and Responsibility to Enforce the Laws

SENASA has the authority and responsibility to enforce U.S. requirements. Each establishment has copies of the pertinent SENASA and U.S. rules and regulations.

6.1.5 Adequate Administrative and Technical Support

During the audit, the auditors found that SENASA lacks the degree of administrative and technical support necessary to adequately support its inspection system. SENASA does have the resources and ability to support a third-party audit.

6.2 Headquarters Audit

The auditors conducted a review of inspection system documents at the SENASA headquarters and at local SENASA offices at the establishments. These 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
- 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
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, or withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

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

7. ESTABLISHMENT AUDITS

The FSIS auditors visited a total of 17 establishments, 15 slaughter/processing establishments and two processing establishments. Five establishments were delisted by SENASA due to inhumane slaughter activities at these establishments.

Two other establishments received a Notices of Intent to Delist from SENASA for poor sanitary operations, inadequate condemned product control, and inadequate implementation of HACCP. These two establishments may retain their certificate for export to the United States provided they correct all deficiencies noted during the audit within 30 days of the date the establishment was audited.

Specific deficiencies noted in establishments are found in the attached Foreign Establishment Audit Checklists.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

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

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

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

The following laboratories were audited:

1. XENOBIOTICOS Laboratory, Buenos Aires. This is a private laboratory that conducts residue testing for SENASA.
2. SENASA Central Laboratory Martinez, Buenos Aires. This is a government laboratory that conducts microbiological and residue testing and is used as a reference laboratory in the country.
3. LITORAL S.A. Laboratorio, Galvez, Santa Fe. This is a private laboratory that conducts residue and microbiological sampling and testing of official SENASA samples.

4. SWIFT ARMOUR S.A. Laboratorio, Galvez, Santa Fe. This is a private laboratory approved for testing establishment microbiological samples and SENASA official samples.

All private laboratories are audited at least once a year by the SENASA Laboratory Coordinator. All of the above laboratories are scheduled for an audit in October 2003.

No concerns arose from the audit of these laboratories.

9. SANITATION CONTROLS

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

Based on the on-site audits of the establishments, and except as noted below, 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, and except as noted below, Argentina's inspection system also 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 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP's were met, according to the criteria employed in the United States domestic inspection program. The SSOP's in all the establishments audited were found to meet the basic FSIS regulatory requirements. The following deficiencies regarding SSOP implementation were noted:

- No preventive measures and times were recorded in the daily pre-operational sanitation documentation in three establishments.
- In one establishment, repetitive pre-operational deficiencies were not adequately addressed.
- In one establishment, pre-operational sanitation documentation was incomplete.

9.2 Sanitation

The following sanitation deficiencies were noted (further details may be found in the individual Foreign Establishment Audit Checklists, which are attached to this report):

Sanitary Operations

- In four establishments, condensation was falling from overhead structures that were not cleaned and sanitized daily onto exposed product and/or production equipment.
- In two establishments, rain leakage was falling into production and dry storage areas.
- In the boning rooms in three establishments, conveyor belts were worn out and black grease was observed on the stainless steel belt and underneath a perforated plastic belt.
- In the cooked corn beef department in one establishment, cross contamination was observed during stuffing of product into plastic rolls.
- In one establishment, a plastic tube containing edible beef broth was on the floor and was greasy.
- In one establishment, a hand wash sink in the hallway to the boning room was not operating.
- In one establishment, there was a potential of cross contamination of beef carcasses from boots of workers on the eviscerating line.
- In one establishment, exposed product was stored directly below shipping boxes of vacuum-packing bags.
- In one establishment, boxed product was stored directly on the floor in the freezer.

Equipment

- There was common contact between carcass necks and the splitting saw drain hose in one establishment.
- The viscera trays in one establishment were not cleaned before being used again.
- The conveyor belt was not cleaned adequately in one establishment.

Employee Hygiene

- In one establishment, an employee's armpits were not covered and the employee was handling exposed products.
- In one establishment, workers' aprons were not cleaned adequately after breaks.

Condemned Product Control

- In one establishment, condemned product was not denatured or decharacterized.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditors reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, humane handling and humane slaughter, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned products. The auditors determined that Argentina's inspection system had adequate controls in place. No deficiencies were noted.

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

No deficiencies were noted.

11. SLAUGHTER/PROCESSING CONTROLS

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

The controls also include the implementation of HACCP systems in all establishments and implementation of a testing program for generic *E. coli* in slaughter establishments.

11.1 Humane Handling and Slaughter

Electrical stunning procedures were not properly carried out in five establishments. These establishments were delisted by SENASA.

11.2 HACCP Implementation

All establishments approved to export meat products to the United States are required to have developed and adequately implemented HACCP programs. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

The HACCP programs were reviewed during the on-site audits of the 17 establishments. Deficiencies with implementation of HACCP requirements were identified in all 17 establishments as follows:

- In all of the 17 establishments, HACCP plans did not include verification and validation procedures by SENASA and by the establishments.
- In one establishment, the description of corrective actions to be taken in response to deviations from critical limits was inadequate.
- In one establishment, preventive measures were not included in the written corrective actions specified in response to deviations from critical limits.
- In one establishment, the monitoring frequency specified for critical limits was inappropriate.

It appears that there is no formal training program in PR/HACCP requirements for government inspectors. In all 17 establishments, the government inspectors did not understand HACCP verification procedures. It was found that in 14 of the 17 establishments audited, establishment-paid employees were performing inspection duties.

11.3 Testing for Generic *E. coli*

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

Fifteen of the 17 establishments audited were required to meet the basic FSIS regulatory requirements for testing for generic *E. coli* and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for generic *E. coli* was properly conducted in 14 slaughter establishments. One establishment did not follow the proper procedure (sponge liquid was dripping onto the carcass during sampling).

All 15 slaughter establishments were not recording test results properly. These 15 establishments were using excision sample criteria to record sponge sample results.

11.4 Testing for *Listeria monocytogenes*

Five of the 17 establishments audited were producing ready-to-eat products for export to the United States. In accordance with United States requirements, the HACCP plans in these establishments had been reassessed to include *Listeria monocytogenes* as a hazard reasonably likely to occur.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditors 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.

The SENASA Central Laboratory, Martinez, Buenos Aires, a government laboratory, was audited. No deficiencies were noted.

Argentina's National Residue Testing Plan for 2003 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*.

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in all slaughter and processing establishments. However, it was found that in 14 of the 17 establishments audited, establishment-paid employees were performing inspection duties.

13.2 Testing for *Salmonella* species

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

Fifteen of the 17 establishments audited were required to meet the basic FSIS regulatory requirements for testing for *Salmonella* and were evaluated according to the criteria employed in the United States' domestic inspection program.

Testing for *Salmonella* was properly conducted in all fifteen slaughter establishments.

13.3 Species Verification

Species verification was being conducted in those establishments in which it was required.

13.4 Monthly Reviews

During this audit it was found that, in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required.

13.5 Inspection System Controls

The CCA lacked complete controls in certain areas of inspection which are mentioned below. However, controls were 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.

During this audit, it was noted that 24 out of 28 of the establishments certified to export to the United States were using 90 employees, paid by the establishment, for inspection-related work. In 14 of the 17 establishments audited on-site, establishment paid employees were performing inspection duties.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other countries for further processing.

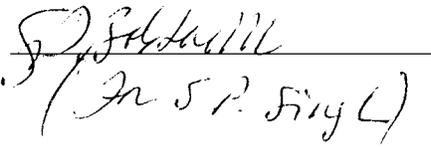
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting (teleconference) was held on April 3, 2003, with the CCA. At this meeting, the primary findings, conclusions, and recommendations from the audit were presented by the auditor.

The CCA understood and accepted the findings.

Dr. S. P. Singh
International Audit Staff Officer



(Dr. S. P. Singh)

15. ATTACHMENTS

Individual Foreign Establishment Audit Forms
Individual Foreign Laboratory Forms
Foreign Country Response to the Draft Audit Report

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 SENASA

CITY & COUNTRY
 Martinez, Argentina

ADDRESS OF LABORATORY
 Sir.A.Fleming 1653, Martinez

NAME OF REVIEWER
 Dr. S. P. Singh

NAME OF FOREIGN OFFICIAL
 Dr. Veronica Maria Torres Leedham

Residue Code/Name		ITEM #	100	200	300	203	111	80	400	500	600	700	800	902
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE											
	Sample Handling	01	A	A	A	A	A	A	A	A	A	A	A	A
	Sampling Frequency	02	A	A	A	A	A	A	A	A	A	A	A	A
	Timely Analyses	03	A	A	A	A	A	A	A	A	A	A	A	A
	Compositing Procedure	04	O	O	O	O	O	O	O	O	O	O	O	O
	Interpret Comp Data	05	O	O	O	O	O	O	O	O	O	O	O	O
Data Reporting	06	A	A	A	A	A	A	A	A	A	A	A	A	
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A	A	A	A	A
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A	A	A	A	A
	Equipment Operation	09	A	A	A	A	A	A	A	A	A	A	A	A
	Instrument Printouts	10	A	A	A	A	A	A	A	A	A	A	A	A
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A	A	A	A	A	A	A
	Recovery Frequency	12	A	A	A	A	A	A	A	A	A	A	A	A
	Percent Recovery	13	A	A	A	A	A	A	A	A	A	A	A	A
	Check Sample Frequency	14	A	A	A	A	A	A	A	A	A	A	A	A
	All analyst w/Check Samples	15	A	A	A	A	A	A	A	A	A	A	A	A
	Corrective Actions	16	A	A	A	A	A	A	A	A	A	A	A	A
	International Check Samples	17	O	O	O	O	O	O	O	O	O	O	O	O
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	A	A	A	A	A	A	A	A	A	A	A	A
OTHER REVIEW		19												
		20												

SIGNATURE OF REVIEWER

Dr. S. P. Singh (for S.P. Singh)

DATE

9/2/03

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

03-26-03

NAME OF FOREIGN LABORATORY

SENASA. CENTRAL LABORATORY

FOREIGN GOV'T AGENCY
SENASA

CITY & COUNTRY
Martinez, Argentina

ADDRESS OF LABORATORY
Sir.A.Fleming 1653, Martinez

NAME OF REVIEWER
Dr. S. P. Singh

NAME OF FOREIGN OFFICIAL
Dr. Veronica Maria Torres Leedham

RESIDUE CODES	ITEM NO.	COMMENTS
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03-27-2003

Laboratorio Litoral S.A.

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY SENASA	CITY & COUNTRY Rosario, Argentina	ADDRESS OF LABORATORY 1st May Avenue
NAME OF REVIEWER Dr.S.P.Singh	NAME OF FOREIGN OFFICIAL Dr. Veronica M. T. Leedham	

Residue Code/Name		100	200	300	500	600	700	800	902	907	923	950	
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE										
	Sample Handling	01	A	A	A	A	A	A	A	A	A	A	A
	Sampling Frequency	02	A	A	A	A	A	A	A	A	A	A	A
	Timely Analyses	03	A	A	A	A	A	A	A	A	A	A	A
	Compositing Procedure	04	O	O	O	O	O	O	O	O	O	O	O
	Interpret Comp Data	05	O	O	O	O	O	O	O	O	O	O	O
Data Reporting	06	A	A	A	A	A	A	A	A	A	A	A	
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A	A	A	A
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A	A	A	A
	Equipment Operation	09	A	A	A	A	A	A	A	A	A	A	A
	Instrument Printouts	10	A	A	A	A	A	A	A	A	A	A	A
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A	A	A	A	A	A
	Recovery Frequency	12	A	A	A	A	A	A	A	A	A	A	A
	Percent Recovery	13	A	A	A	A	A	A	A	A	A	A	A
	Check Sample Frequency	14	A	A	A	A	A	A	A	A	A	A	A
	All analyst w/Check Samples	15	A	A	A	A	A	A	A	A	A	A	A
	Corrective Actions	16	A	A	A	A	A	A	A	A	A	A	A
International Check Samples	17	O	O	O	O	O	O	O	O	O	O	O	
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	A	A	A	A	A	A	A	A	A	A	A
OTHER REVIEW		19											
		20											

SIGNATURE OF REVIEWER

Dr. S. P. Singh

DATE

9/3/2003

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

03-27-2003

NAME OF FOREIGN LABORATORY

Laboratorio Litoral S.A.

FOREIGN GOV'T AGENCY
SENASA

CITY & COUNTRY
Rosario, Argentina

ADDRESS OF LABORATORY
1st May Avenue

NAME OF REVIEWER
Dr.S.P.Singh

NAME OF FOREIGN OFFICIAL
Dr.Veronica M. T. Leedham

RESIDUE
CODES

ITEM
NO.

COMMENTS

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 SENASA

CITY & COUNTRY
 Rosario, Argentina

ADDRESS OF LABORATORY
 Ave. May (JDPERON)

NAME OF REVIEWER
 Dr. S.P. Singh

NAME OF FOREIGN OFFICIAL
 Dr. Veronica Leedham

Residue Code/Name		▶	E.C.	Sal	Lm	0157												
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #	EVALUATION CODE															
	Sample Handling	01		A	A	A	A											
	Sampling Frequency	02		A	A	A	A											
	Timely Analyses	03		A	A	A	A											
	Compositing Procedure	04		O	O	O	O											
	Interpret Comp Data	05		O	O	O	O											
Data Reporting	06		A	A	A	A												
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A	A	A											
	Correct Tissue(s)	08		A	A	A	A											
	Equipment Operation	09		A	A	A	A											
	Instrument Printouts	10		A	A	A	A											
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	A	A	A	A											
	Recovery Frequency	12		A	A	A	A											
	Percent Recovery	13		A	A	A	A											
	Check Sample Frequency	14		A	A	A	A											
	All analyst w/Check Samples	15		A	A	A	A											
	Corrective Actions	16		A	A	A	A											
	International Check Samples	17		O	O	O	O											
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE	A	A	A	A											
OTHER REVIEW		19	EVAL. CODE															
		20	EVAL. CODE															

SIGNATURE OF REVIEWER

Dr. S.P. Singh (Dr. S.P. Singh)

DATE

9/3/2003

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

03-27-2003

NAME OF FOREIGN LABORATORY

Swift Armour S.A. Laboratry

FOREIGN GOV'T AGENCY
SENASA

CITY & COUNTRY
Rosario, Argentina

ADDRESS OF LABORATORY
Ave.May (JDPERON)

NAME OF REVIEWER
Dr.S.P.Singh

NAME OF FOREIGN OFFICIAL
Dr.Veronica Leedham

RESIDUE CODES	ITEM NO.	COMMENTS
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FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY
 SENASA

CITY & COUNTRY
 Buenos Aires, Argentina

ADDRESS OF LABORATORY
 Albarellos, 2676, B.A.

NAME OF REVIEWER
 Dr. S. P. Singh

NAME OF FOREIGN OFFICIAL
 Dr. Veronica Leedham

Residue Code/Name		▶	80	100	111	200	300	400	500	600	700	800	902	923
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #												
	Sample Handling	01	A	A	A	A	A	A	A	A	A	A	A	A
	Sampling Frequency	02	A	A	A	A	A	A	A	A	A	A	A	A
	Timely Analyses	03	A	A	A	A	A	A	A	A	A	A	A	A
	Compositing Procedure	04	O	O	O	O	O	O	O	O	O	O	O	O
	Interpret Comp Data	05	O	O	O	O	O	O	O	O	O	O	O	O
Data Reporting	06		A	A	A	A	A	A	A	A	A	A	A	A
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A	A	A	A	A
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A	A	A	A	A
	Equipment Operation	09	A	A	A	A	A	A	A	A	A	A	A	A
	Instrument Printouts	10	A	A	A	A	A	A	A	A	A	A	A	A
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A	A	A	A	A	A	A
	Recovery Frequency	12	A	A	A	A	A	A	A	A	A	A	A	A
	Percent Recovery	13	A	A	A	A	A	A	A	A	A	A	A	A
	Check Sample Frequency	14	A	A	A	A	A	A	A	A	A	A	A	A
	All analyst w/Check Samples	15	A	A	A	A	A	A	A	A	A	A	A	A
	Corrective Actions	16	A	A	A	A	A	A	A	A	A	A	A	A
	International Check Samples	17	A	A	A	A	A	A	A	A	A	A	A	A
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	A	A	A	A	A	A	A	A	A	A	A	A
OTHER REVIEW		19												
		20												

SIGNATURE OF REVIEWER

Dr. S. P. Singh (for S. P. Singh)

DATE

9/3/2003

FOREIGN COUNTRY LABORATORY REVIEW

(Comment Sheet)

REVIEW DATE

03-28-2003

NAME OF FOREIGN LABORATORY

XENOBIOTICOS SRL

FOREIGN GOV'T AGENCY
SENASA

CITY & COUNTRY
Buenos Aires, Argentina

ADDRESS OF LABORATORY
Albarellos, 2676, B.A.

NAME OF REVIEWER
Dr. S. P. Singh

NAME OF FOREIGN OFFICIAL
Dr. Veronica Leedham

RESIDUE
CODES

ITEM
NO.

COMMENTS

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Saiep la Anonima Salto BUENOS AIRES	2. AUDIT DATE 3-06-2003	3. ESTABLISHMENT NO 189	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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	X
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.		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

ARGENTINA Est. 189 3-6-2003

- 19 - Verification of CCP not recorded by the government inspection agency (SENASA) CFR 417.8.
- 46 - Strips for outside doors were missing creating a potential for rodent access; a hand-washing sink was not in operation in a hallway; and boneless inspection was not done at a permanent place with a good light source.
- 51 – Proper enforcement of U. S. requirements should have prevented these deficiencies from occurring.
- 52 - Stunning device was not provided with indicator light or warning for operator for completeness of stunning - electrical voltage [CFR 313.30-(b)(3)].
- 60 – During the exit conference with SENASA officials, FSIS requested that this establishment be delisted due to the deficiencies listed above, including the inhumane slaughter observations.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

S.P. Singh (for S.P. Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Quick Food, S.A. San Jorge SANTA FE	2. AUDIT DATE 3-18-2003	3. ESTABLISHMENT NO. 1014	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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.		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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

ARGENTINA – Est. 1014 3-18-2003

19 - HACCP verification frequency was not mentioned and SENASA verification of CCPs was not recorded or mentioned in any documents (CFR-417.8).

29 - *E.coli* testing results were not recorded according to the method of sampling used (CFR 310.25).

51 – Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

52 - Stunning was not done properly on two animals. Stun gun was used after electrical stunning (CFR 313.30).

60 - During the exit conference with SENASA officials, FSIS requested that this establishment be delisted due to the deficiencies listed above, including the inhumane slaughter observations.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

S.P. Singh (for S.P. Singh)

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Consignaciones Rurales Berazategui BUENOS AIRES	2. AUDIT DATE 3-11-2003	3. ESTABLISHMENT NO 1378	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. Ghias Mughal		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	X
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	X
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.	X	Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

ARGENTINA Est. 1378 3-11-2003

- 19 - There was no records verification of the HACCP program by SENASA and verification by establishment was not recorded and frequency was not mentioned (CFR 417.8).
- 21 - There was no annual re-assessment of the HACCP plan and modification was not recorded (CFR 417.4).
- 29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).
- 39 - The maintenance of coolers and equipment was poor.
- 46 - The ceiling was leaking at several locations in the establishment because of heavy rain.
- 51 - Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.
- 52 - Inhumane slaughter was observed in three beef animals in a row. Electrical stunning was inadequate and no back up stunning device was available at the time of this audit.
- 60 - Unacceptable establishment. This establishment was delisted by SENASA officials due to the deficiencies listed above, including the inhumane slaughter observations.

61. NAME OF AUDITOR

Dr. Ghias Mughal

62. AUDITOR SIGNATURE AND DATE

J. B. ... (for S.D. Singh)

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Friar, S.A. Reconquista SANTA FE	2. AUDIT DATE 03-17-03	3. ESTABLISHMENT NO. 1970	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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.		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

ARGENTINA Est. 1970 3-17-2003

19 - In the HACCP plan, there was no verification from agency (SENASA) and frequency of verification was not mentioned in the HACCP plan for the boning area (CFR 417.8).

51 - Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

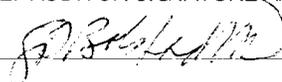
52 - Stunning of animals was not properly done and there was no monitoring of incomplete stunning (CFR 313.30).

60 - During the exit conference with SENASA officials, FSIS requested that this establishment be delisted due to the deficiencies listed above, including the inhumane slaughter observations.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

 (for S.P. Singh)

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Fco. Villa Olga S.A. Bahia Blanco BUENOS AIRES	2. AUDIT DATE 3-25-2003	3. ESTABLISHMENT NO. 2064	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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 SSOPs 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.	X	47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.	X	Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

ARGENTINA Est. 2064 3-25-2003

19 - There was no HACCP records verification by SENASA (CFR 417.8).

21 - In HACCP there was no annual reassessment records (CFR 417.4).

29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).

45 - A conveyor belt in the boning room was worn out.

51 - Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

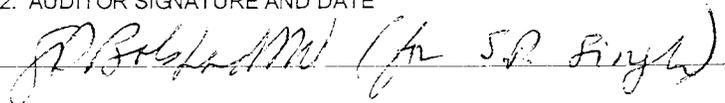
52 - The stunning procedure was inadequate. Two animals were double stunned using electrical and hand pneumatic gun (CFR 313.30).

60 - During the exit conference with SENASA officials, FSIS requested that this establishment be delisted due to the deficiencies listed above, including the inhumane slaughter observations.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

 (for S.P. Singh)

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Swift Armour Rosario SANTA FE	2. AUDIT DATE 2-28-2003	3. ESTABLISHMENT NO. 13	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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	X
19. Verification and validation of HACCP plan.	X	47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	X
21. Reassessed adequacy of the HACCP plan.	X	Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

ARGENTINA Est. 13 2-28-2003

- 19/21 - Verification and reassessment was not done by inspection agency (SENASA) CFR 417.8.
- 29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).
- 46 -An unidentified black grease-like substance was observed on a product conveyor belt. The belt was stopped and corrective action was taken.
- 46 - Condensation from overhead structures was observed in the cooked beef product area. The area was tagged and no product was under the affected area.
- 48 - Inedible, edible and condemned product were not clearly identified.
- 51 – Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

 (for S.P. Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Quickfood, S.A. Martinez BUENOS AIRES	2. AUDIT DATE 3-10-2003	3. ESTABLISHMENT NO. 18	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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 SSOPs have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
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.	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.		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	O
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

ARGENTINA Est. 18 3-10-2003

19 - In the HACCP program, there was no CCP verification by SENASA.

39 - It was raining hard at the time of audit and there was several leaks in the dry storage area, hallway, and ground meat patty production area. The auditor decided that production must be stopped and SENASA agreed and production was stopped. Corrective actions were to be taken before operation could begin.

45 - One plastic storage bin in the spice room was worn out with flaking plastic. SENASA took corrective action.

51 - Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

61. NAME OF AUDITOR

Dr. S. P. Singh Est. 18

62. AUDITOR SIGNATURE AND DATE

S.P. Singh (for S.P. Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Quick Food S.A. Villa Mercedes, SAN LUIS	2. AUDIT DATE 3-4-2003	3. ESTABLISHMENT NO. 1113	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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 SSOPs 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.		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.			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		X	57. Monthly Review		
Salmonella Performance Standards - Basic Requirements			58.		
30. Corrective Actions			59.		
31. Reassessment					
32. Written Assurance					

60. Observation of the Establishment

ARGENTINA Est. 1113 3-4-2003

29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).

19 - No verification records were available from SENASA regarding HACCP controls (CFR 417.8).

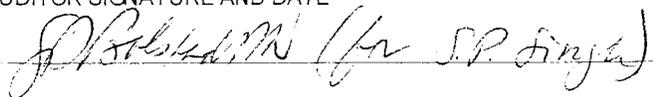
45 - Black grease was observed underneath a perforated plastic belt in the boning room.

51 - Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

 (for S.P. Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION ECO. Cepa S.A. Venado Tuerto SANTE FE	2. AUDIT DATE 3-5-2003	3. ESTABLISHMENT NO 1373	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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	X
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	X
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.		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/AQU/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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

ARGENTINA Est. 1373 3-5-2003

19 - In HACCP there was no CCP verification records from SENASA (CFR 417.8).

29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).

39 - In the beef cooking area, a plastic tube used to carry beef broth for concentration was dirty and found on the floor. It should be of a transparent nature or stainless steel for sanitary operation and for good cleaning and examination for SENASA.

45 - In the beef cooking area, plastic drums used in dumping meat parts into a stuffer was kept on the floor and there is potential of cross contamination from floor or floor water. Plastic tubes stuffed with meat before cooking were kept on a table which has a drain for juices and water was contaminating each filled tube - so drain needed for preventing cross contamination.

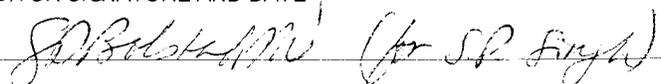
46 - In the boning area, black grease was observed on a stainless conveyor belt. Corrective action was taken immediately.

51 - Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

 (Dr. S. P. Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Eco. Rioplatense, S.A. General Pacheco BUENOS AIRES	2. AUDIT DATE 3-7-2003	3. ESTABLISHMENT NO. 1920	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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.	X	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	X
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.		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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

ARGENTINA Est. 1920 3-7-2003

- 11 - An unidentified material was observed on the boning conveyor belt in the boning room creating the potential for adulteration of the product. The belt was stopped, the source was identified and operation resumed after one hour. A few plastic containers in the boning room were broken on the bottom, although they had plastic liners for product protection.
- 19 - HACCP verification of critical control points was not recorded by SENASA (CFR 417.8).
- 29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).
- 41 - There was an ammonia leak in a cooler but no product was stored.
- 46 - There was a potential for cross contamination from the boots of workers on the eviscerating line of beef carcasses because metal protection was not high enough to protect all sizes of carcasses.
- 51 - Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

J. P. Baldoni (for S.P. Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Macellarius S.A. Ciudad Evita BUENOS AIRES	2. AUDIT DATE 3-13-2003	3. ESTABLISHMENT NO. 2676	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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	
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	X
21. Reassessed adequacy of the HACCP plan.		X	Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.			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	O
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

ARGENTINA Est. 2676 3-13-2003

- 13 - In SSOP, there was no record of what time pre-operational sanitation check control took place.
- 15 - In HACCP, there were no control measures of GMP and Quality Control to verify CCPs (CFR 417.2).
- 48 - Condemned product was not identified by ink or de-characterization.
- 51 - Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

Dr. S. P. Singh (for SP Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Sadowa S.A. Mar del Plata BUENOS AIRES	2. AUDIT DATE 3-14-2003	3. ESTABLISHMENT NO. 1921	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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	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		56. European Community Directives	O
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

ARGENTINA Est. 1921 3-14-2003

22 - No records were available regarding SENASA verification of HACCP controls (CFR 417.8).

29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).

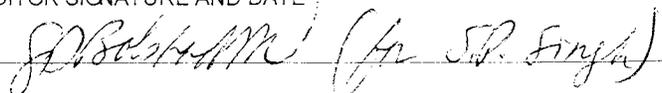
46 - Metal detectors and an x-ray machine were installed because of previous history of lead contamination of products. They were effective but the product must be located on the center of the belt and the calibration of the machine must be done at the same location. Corrective actions were taken.

51 -- Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

 (for S.P. Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Finexcor, S.A. Bernal Buenos Aires	2. AUDIT DATE 3-3-03	3. ESTABLISHMENT NO. 2062	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S.P. Singh		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.	X	37. Import	
12. Corrective action when the SSOPs 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.	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	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
19. Verification and validation of HACCP plan.	X	47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	X
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.		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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

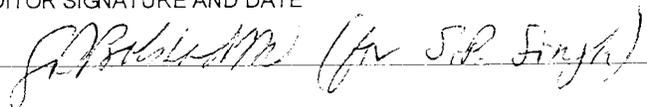
ARGENTINA – Est. 2062 3-3-2003

- 11 – In the cooked beef area, cooler wall panels were not sealed creating the potential for unsanitary conditions. Condensation was observed all over the plant. Direct product contamination was prevented as the affected areas in the plant were not being used.
- 15/19 – In the HACCP plan, there was a CCP that addressed zero tolerance for feces, ingesta, and milk but monitoring and verification was not clearly indicated and there was no verification procedures implemented by inspection agency, SENASA (CFR 417.2 and 417.8).
- 29 – *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).
- 45 – Equipment – rust was observed on metal racks of the freezer in the cooked beef area.
- 46 – Heavily beaded condensate on overhead structures was observed in coolers and hallway. The area was tagged off by SENASA.
- 46 – There was condensate on the ceiling of the preparation area of raw beef for stuffing tubes for cooked beef.
- 48 – In the boning room, inedible and condemned meat were stored in a plastic bag without any denaturing. Corrective action was taken to identify the bags. Also, denaturing ink will be used in the future.
- 51 – Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.
- 60 – A 30-day Notice of Intent to Delist was requested to be issued by SENASA for this establishment.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

Handwritten signature of Dr. S. P. Singh in cursive, followed by the text "(for S.P. Singh)" in a smaller font.

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Estancias Del Sur. Unquillo CORDOBA	2. AUDIT DATE 3-19-2003	3. ESTABLISHMENT NO. 2065	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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	X
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	X
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.		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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

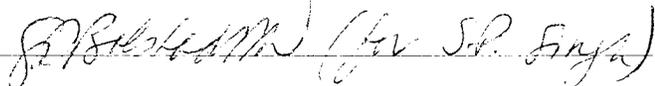
ARGENTINA Est. 2065 3-19-2003

- 19 - There were no HACCP verification procedures by SENASA or the establishment (CFR 417.8 and 417.2).
- 39 – The maintenance of conveyor belts in the boning room was lacking. Condensation was observed above the carcasses in cooler No.2. The carcasses were removed. A rust area was observed in cooler No.2.
- 29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).
- 47 - Employees were working with open armpits creating the potential for cross contamination of edible product.
- 51 – Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.
- 60 - This establishment was issued a 30-day Notice of Intent to Delist by SENASA due to the above and other conditions observed by SENASA.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

 (for S.P. Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Fco. Cepa Pontevedra BUENOS AIRES	2. AUDIT DATE 3-4-2003	3. ESTABLISHMENT NO 2067	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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	X
18. Monitoring of HACCP plan.		46. Sanitary Operations	X
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		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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

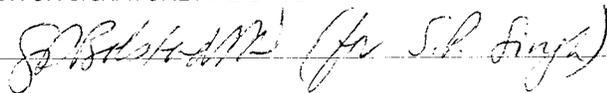
ARGENTINA Est. 2067 3-4-2003

- 19 - HACCP verification of CCPs and observing the program was not recorded by inspection agency (SENASA) as required (CFR 417.8).
- 29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).
- 22 - In the HACCP plan, there was not a numbering system of CCP that addressed all CCPs (CFR 417.2).
- 45 - Black grease and dirt were observed on a conveyor belt in a labeling machine in the canning plant.
- 46 - There was lot of potential cross contamination of cooked beef product in the filling, sealing and washing of different cans. Product should not be reworked if it is kept in bins too long or removed at time intervals. Freezer doors and shipping area sealing strips on doors were worn out creating the potential for vermin entry.
- 51 - Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

 (for S.P. Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION ECO. Arre Beef S.A. Perez Millan BUENOS AIRES	2. AUDIT DATE 3-2-2003	3. ESTABLISHMENT NO. 2082	4. NAME OF COUNTRY Argentina	5. NAME OF AUDITOR(S) Dr. S. P. Singh	6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT
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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.	X	Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

ARGENTINA Est.2082 3-12-2003

19 - In HACCP, there were no CCP verification records by SENASA (CFR 417.8).

21 - In HACCP, there was no reassessment done after modification (CFR 417.4).

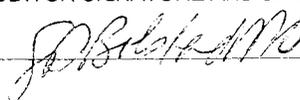
29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).

51 - Proper enforcement of U.S. requirements should have prevented these deficiencies from occurring.

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

 (for S.P. Singh)

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Exportaciones Agroindustriales Santa Rosa LA PAMPA	2. AUDIT DATE 3-24-2003	3. ESTABLISHMENT NO. 2520	4. NAME OF COUNTRY Argentina
5. NAME OF AUDITOR(S) Dr. S. P. Singh		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.	X	Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		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	X	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

ARGENTINA Est. 2520 3-24-2003

19 - There was no HACCP verification from SENASA (CFR 417.8).

21 - There was no annual HACCP re-assessment done (CFR 417.2).

29 - *E. coli* testing results were not recorded according to the method of sampling used (CFR 310.25).

61. NAME OF AUDITOR

Dr. S. P. Singh

62. AUDITOR SIGNATURE AND DATE

 (for S.P. Singh)

COURTESY TRANSLATION

Dear Madam,

I am writing in response to your letter of 18 July of 2003, in which was attached the Final Draft of the on-site Audit of Argentina Meat Inspection System that was conducted between February 27 and April 3, 2003 and was elaborated by Dr. Suresh SINGH. With reference to the "Final Draft Audit Report for Argentina" issued by FSIS in relation to the audit the following comments are submitted to the U.S. authorities:

- (1) 3. Protocol: The audit to our country stated that it would include the inspection system for poultry flocks and this was never expressed or mentioned during the visit. Therefore this statement is erroneous.

- (2) 6. Main Findings: The report states that there are ten (10) field supervisors. This is incorrect as Resolution N° 509/01 (of which the auditors were informed) states that the National Agrifood Inspection Office has fourteen (14) "Area Supervisors" for the entire country. These professionals are responsible for overseeing the beef plants that are subject to the control of two Units (the Control Unit and the Processing Plants Unit). The professionals of both areas are going through a continuous training program on HACCP and Animal Welfare.

6.1.1 Control Systems of the CCA: The report states that only one official at the head office and two supervisors are responsible for controlling the requirements to export to the U.S. This is incorrect because all the officials of this Inspection Office of Animal Derived Products are responsible for ensuring compliance. The National Agrifood Inspection Office has taken into account this observation and has conformed a group of 6 (six) supervisors that have beginning another period of establishment supervision.

6.1.3. "Appointment of Competent and Qualified Inspectors": The report comments on personnel training. It must be noted that the training offered by SENASA is conducted by:

- A. INAP (National Government Administration Institute)
- B. The Human Resources Office of SENASA and SENASA's Organization
- C. Special training by the National Agrifood Inspection Office. From this source of training this has been intensified, and which was timely informed to you. It must be pointed out that HACCP and Animal Welfare training has been carried out by National and International Trainers. SENASA has contacted other assistant training groups, and this has been transferred to SENASA's professionals and also technicians from private companies. All the details on this issue have been sent to you through our Agricultural attaché.

6.1.5 "Adequate Administrative and Technical Support": The National Agrifood Inspection Office has taken note on this observation and has put personnel in Control Unit and the Processing Plants Unit. Also, SENASA is carrying out a better put in order its administrative process between SENASA's personnel at plant level and Central level.

(3) 9. "Hygiene Controls": Once again, it is incorrect to state that the auditors evaluated the inspection system for poultry flocks: item (1).

(4) 11. "Slaughter / Processing Controls":

11.3. "Testing for generic E.coli": All the plants had analytical test results because all of them had the records for the window, i.e. the last thirteen test results as required in U.S. specifications. Additionally, the FSIS auditors stated that it was mandatory to plot the results of the plate counts. In order to comply with this recommendation the National Agrifood Inspection Office has issue Circular N° 3531/03.

(5) 13.5. "Control of the Inspection System": The developing of supervisor groups that were mentioned before, that are determined by specific working areas and the intensive training program based on the detected observations focus over all SENASA's fiscalization professionals. This has corrected the observed lack of controls of certain inspection areas.

**CORRECTIVE ACTIONS ADOPTED BY THE
ESTABLISHMENTS AS A RESULT OF THE USDA - FSIS AUDIT**

Officially Approved Establishment N° 13 - Swift Armour S.A. (02-28-03)

- 1) SENASA does not verify the HACCP Plan implemented by the plant:
 - a) *Circular N° 3531/03 has been issued specifying how the Inspection Service must verify the HACCP plan implemented by the companies.*
 - b) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*
 - c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

- 2) Test results for generic E. coli are not recorded in accordance with the sampling method:
The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard.

- 3) Condemned inedible and edible products were not clearly identified:
The establishment reviewed the SOPs, specifically as they refer to identification of containers for products.

Officially Approved Establishment N° 18 - Quickfood S.A. (04/04/03)

- 1) The Inspection Service does not verify the CCPs of the HACCP Plan.
 - a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*
 - b) *Circular N° 3353/98 98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*
 - c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

- 2) At the time of the audit, heavy rain caused filtrations in different areas of the plant. SENASA stopped operations with the agreement of the auditor:
Before resuming operations, the establishment identified the problem, took corrective actions that included repairing and placing impermeable material on the roof, and verified the effectiveness of the actions. The Auditors were informed of the actions taken and of the results before they returned to the U.S.

Officially Approved Establishment N° 1014 - Quickfood S.A. (03-18-03)

1) No records of SENASA having verified the implementation of the HACCP System and the CCPs:

- a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*
- b) *Circular N° 3353/98 98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*
- c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

2) Test results for generic E. coli are not recorded in accordance with the sampling method:
The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard.

3) Stunning of two animals was incorrect: concussion system (cashknocker) was applied after electric stunning:

The establishment was delisted after the FSIS visit. The company adopted measures to avoid a repeat of the error; employees were trained; the stunning box and stunner were modified and adjusted. The company implemented a system to record monitoring results and the Inspection Service verifies the procedure. Additional documentation on animal welfare measures is attached.

Officially Approved Establishment N° 1113 - Quickfood S.A. (03/04/03)

1) Test results for generic E.coli are not recorded in accordance with the sampling method:
The company's records conform to regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard.

2) No records of SENASA having verified the implementation of the HACCP System:

- a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*
- b) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*
- c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

3) Dark fat was observed below a perforated plastic conveyor in the cutting room:

The plant immediately adopted corrective actions and reviewed its maintenance SOPs and SSOPs.

Officially Approved Establishment N° 189 - La Anónima (03/06/03)

- 1) SENASA does not verify the implementation of the HACCP System:
 - a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*
 - a) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*
 - b) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

- 2) Exterior protection of the doors was missing; this potentially allows the entry of rodents; the hand wash basin at the entrance was not operational; the lighting in the deboned meat area was insufficient:
 - a) *The company repaired the defective doors and reviewed its SOPs for rodent and vermin control.*
 - b) *The hand wash basin was immediately repaired and the SSOPs were reviewed.*
 - c) *The company increased lighting in the area and relocated the working table for meat cut reinspection.*

- 3) The stunner did not have a light display for the operator to see the electric stunning voltage:

The establishment was delisted after the visit; corrective measures were taken: employees were trained, the stunning box and stunner were modified and adapted. The company implemented a system to record monitoring results and the Inspection Service verifies the procedure. Additional documentation is included in relation to the animal welfare measures that were adopted

Officially Approved Establishment N° 1373 - CEPA S.A. (03/05/03)

- 1) SENASA does not verify and record the HACCP System and the CCPs:
 - a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*
 - b) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*
 - c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

- 2) Results for generic E.coli are not recorded in accordance with the sampling method:

The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard.

2) In the cooked beef area, a plastic tube containing beef broth that was going to be concentrated was unclean and lying on the floor. The tube should be clear or of stainless steel to allow washing and inspection by SENASA:

The company immediately replaced the tube to comply with sanitary requirements and reviewed the SSOPs.

3) In the unprocessed product area of the cooked beef section, the plastic containers were on the floor and this is a potential source of cross-contamination with the water on the floor. Plastic tubes with meat were placed on a table to drain and the drained juice and water were contaminating the tubes; a drain is required to avoid cross-contamination:

The plant modified the design of the equipment to avoid cross-contamination and reviewed the SSOPs.

4) In the cutting room, dark fat was observed on the conveyor belt.

Corrective actions were adopted immediately, the conveyor was cleaned, and the SSOPs were reviewed.

Officially Approved Establishment N° 1378 - Consignaciones Rurales (03/11/03) (not listed)

1) No records of SENASA having verified the implementation of the HACCP System:

a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*

b) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*

c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

2) No annual revalidation of the HACCP Plan; modifications were not recorded.

The establishment revalidated the HACCP Plan after the audit based on the observations made by the Auditors.

3) Test results for generic E.coli are not recorded in accordance with the sampling method:

The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard.

4) Maintenance of chillers and equipment is poor:

The establishment reviewed the maintenance program; a work plan was developed to repair the chillers and the equipment.

5) Filtration on the ceiling due to heavy rainfall:

The establishment identified the problems in the roof and made necessary repairs.

6) Stunning of three animals was unsatisfactory. The electric system is inadequate and there was no emergency system at the time of the audit:

The establishment was delisted by SENASA; corrective actions included:

1) *A back-up stunning device and a back-up stunner were installed beside the existing equipment.*

2) *The design of the stunning box was modified to properly hold the animal and not cause unnecessary suffering.*

3) *All employees responsible for operating the stunner were trained; the efficiency of the procedure is monitored and verified.*

Officially Approved Establishment N° 1920 – Rioplatense S.A. (03/07/03)

1) Unidentified material was observed on the conveyor belt in the cutting room; this is a potential source of contamination for the product. The conveyor was stopped, the source of contamination was identified, and operations were resumed one hour later. The material was a small piece of broken plastic from the conveyor belt:

The establishment reviewed the maintenance program and SSOPs, and replaced the conveyor belt.

2) SENASA does not verify the CCPs identified in the HACCP Plan:

a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*

b) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*

c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

3) Test results for generic E.coli are not recorded in accordance with the sampling method:

The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard.

4) Ammonia leak in a chiller that was empty:

The company identified and replaced the defective valve, and reviewed the maintenance program.

5) Potential cross-contamination caused by the boots worn by the operators of the evisceration line due to an inadequate design of the stand:

The company designed a stainless steel protection for the stands to prevent the boots of the workers from touching the carcasses.

Officially Approved Establishment N° 1921 – SADOWA S.A. (03/14/03)

- 1) No records of SENASA having verified the HACCP System:
 - a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*
 - b) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*
 - c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

- 2) Test results for generic E.coli are not recorded in accordance with the sampling method:
The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard.

- 3) The metal detector and scanner that were installed as a result of the company's history with metal contamination (lead) are effective but the products must be placed in the center of the conveyor belt and the equipment must be calibrated:
Corrective actions were taken; the establishment redesigned the conveyor belt so that the product is in the center.

Officially Approved Establishment N° 2062 – FINEXCOR S.A. (03/03/03)

- 1) In the cooked beef area, the panels on the walls of the chiller are not sealed; this is a potential non-sanitary condition. Condensation was observed throughout the plant:
The company took actions to avoid direct contamination of the product, repaired the panels in the chillers, and reviewed the maintenance program and SSOPs.

- 2) No records of the company or SENASA having verified the CCPs, particularly zero tolerance for faecal and feed contamination:
 - a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*
 - b) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*
 - c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

- 3) Test results for generic E.coli are not recorded in accordance with the sampling method:
The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard.

- 4) Corrosion on the equipment in the blast freezers for cooked beef:
The establishment took corrective actions and reviewed the SSOPs.

5) Significant condensation on the structures in the chillers and corridors. The area was identified and closed by SENASA:

The company changed the ventilation system to avoid a repeat of the problem.

6) Condensation on the ceiling in the raw meat preparation area as a result of tubes filled with cooked beef:

The company modified the ventilation system to avoid a repeat of the problem and reviewed the SSOPs.

7) In the cutting room, inedible and condemned meat is placed in bags that are not marked with a purple cross:

Corrective actions were immediately adopted and ink will be used in the future.

8) SENASA required the company to submit a letter of compliance within 30 days:

The company adopted the actions to correct the problems and avoid repeats. The letter of compliance was presented to Dr. GHIAS MUGHAL before he returned to the U.S.

Officially Approved Establishment N° 2064 – VILLA OLGA S.A. (03/25/03)

1) No records of SENASA having verified the HACCP System:

a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*

b) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*

c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*

2) No annual revalidation of the HACCP Plan:

The company revalidated the HACCP Plan.

3) Test results for generic E.coli are not recorded in accordance with the sampling method:

The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard.

4) Stunning is inadequate. Two animals were stunned twice, once with the electric device and once with the manual pneumatic system:

The plant was delisted after the FSIS audit. The establishment made necessary changes to correct and avoid a repeat of this situation:

1) The design of the stunning box was improved.

2) Back-up and emergency systems were installed.

3) *Employees responsible for performing the procedure were trained and a monitoring and verification system was adopted to measure the efficiency of the procedure.*

Additional documentation on animal welfare measures is attached.

Officially Approved Establishment N° 2065 – ESTANCIAS DEL SUR (03/19/03)

1) No records of SENASA having verified the HACCP System:

a) Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.

b) Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.

c) A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.

2) Maintenance of a conveyor belt in the cutting room is not efficient; condensation on carcasses was observed in Chiller N° 2 and some corrosion:

The company repaired the conveyors and modified the ventilation system in the chillers to avoid condensation. The maintenance program and the SSOPs were reviewed.

3) Test results for generic E.coli are not recorded in accordance with the sampling method:

The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard.

4) The workers' shirts are open under the arms; this is a potential source of cross-contamination for the product:

The company immediately adopted corrective actions, provided adequate clothes, and reviewed the SSOPs.

5) SENASA required the company to submit a letter of compliance within 30 days:

The letter of compliance was presented to the auditors before they returned to the U.S. The letter stated that the company had corrected the observations and had taken necessary measures to avoid a repeat of the problem.

Officially Approved Establishment N° 2062 - CEPA S.A. (03-04-03)

1) No records of SENASA having verified the CCPs:

a) Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.

b) Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.

c) A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.

- 2) Test results for generic E.coli are not recorded in accordance with the sampling method:
The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard
- 3) The HACCP Plan did not identify the CCPs with a number:
The establishment revalidated the HACCP Plan.
- 4) Dark fat and dirt on the conveyor to the can labelling equipment:
The company reviewed operational SSOPs.
- 5) Several potential sources of cross-contamination in the area where the cans are filled, sealed and washed. The remaining product should not be reused if it is stored in containers for a prolonged period of time:
The company took corrective actions and reviewed the SOPs as they refer to filling and sealing procedures.

Officially Approved Establishment N° 2520 – Exportaciones Agroindustriales (03-24-03)

- 1) No records of SENASA having verified the CCPs identified in the HACCP Plan:
 - a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*
 - b) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*
 - c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*
- 2) The HACCP Plan has not be annually revalidated:
The plant revalidated the HACCP Plan.
- 3) Test results for generic E.coli are not recorded in accordance with the sampling method:
The company's records comply with regulatory provisions that require a table showing the last 13 results (window) and plotting of the standard

Officially Approved Establishment N° 1970 – FRIAR S.A. (03-17-03)

- 1) No records of SENASA having verified the HACCP Plan and of the frequency of the verification of the HACCP Plan for the cutting room:
 - a) *Circular N° 3531/03 has been issued specifying the procedure to verify the company's compliance with the HACCP Plan.*
 - b) *Circular N° 3353/98 requires an evaluation of the HACCP Plan, as implemented at the time of the audit.*
 - c) *A national HACCP training program was developed with the advice of, and final evaluation by the "HACCP Consulting Group" from the U.S.*
The company revalidated the HACCP Plan.

2) Stunning of the animals is not adequate:

The plant was delisted after the FSIS audit. The establishment made the necessary changes to correct and avoid a repeat of the same problem:

1) The design of the stunning box was improved.

2) Back-up and emergency systems were installed.

3) Employees responsible for the procedure were trained and a monitoring and verification system to measure the efficiency of the procedure was adopted.