EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis

DG(SANTE) 2020-6935

FINAL REPORT OF AN AUDIT

CARRIED OUT IN

ARGENTINA

FROM 26 FEBRUARY 2020 TO 10 MARCH 2020

IN ORDER TO

EVALUATE THE CONTROL SYSTEM IN PLACE GOVERNING THE PRODUCTION OF BOVINE AND OVINE FRESH MEAT INTENDED FOR EXPORT TO THE EUROPEAN UNION

In response to information provided by the competent authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.

Executive Summary

The report describes the outcome of an audit carried out by Directorate-General for Health and Food Safety in Argentina from 26 February to 10 March 2020. The primary objective of the audit was to assess whether the official controls related to public health aspects and the certification system over the production of fresh bovine and ovine meat intended for export to the European Union (EU) provide adequate guarantees that the production of these commodities is in line with the requirements laid down in EU legislation and, in particular, are able to support the public health attestations contained in the relevant export health certificates.

In this context, the audit also evaluated the implementation and effectiveness of the actions taken by the authorities in response to the recommendations made in previous DG Health and Food Safety audits and in response to the Rapid Alert System for Food and Feed notifications related to the scope of the audit.

In addition, the audit included - in the wider context of the follow-up of an audit carried out in 2018 in respect of the official controls over the production of horse meat destined for the EU – a visit to a horse assembly centre ("acopio").

As regards the production of beef and ovine meat destined for the EU, the audit concludes that a well-designed official control system is in place and which is correctly implemented, thus providing an adequate basis to support the reliability of the attestations contained in the export certificates.

The requirements applicable to holdings and establishments involved in the production of beef and ovine meat are in line with EU standards, and are under official control. The controls were found to be overall effective, and allow the competent authorities to provide adequate assurances that products have been produced in accordance with the EU standards. In particular:

- *at primary production level, the organization and implementation of the controls provide reliable assurances about the identification, movements and traceability of animals entering the EU production chain; and*
- *at establishment level, the official controls were effective: the structural conditions of the establishments as well as the hygienic practices observed were generally good. And, while some deviations from EU animal welfare standards that compromise the guarantees concerning the animal welfare attestation of the EU health certificates were noted at the slaughterhouses during the audit visits, the animals were properly handled and no signs of suffering were detected.*

The audit also confirmed that the actions in response to the relevant recommendations from previous Commission audits in respect of bovine and ovine meat had been implemented, and were found to be effective in addressing the identified shortcomings.

Although the audit did not identify serious animal welfare issues during the visit to one acopio, apart from the lack of shade and insufficient access to water for the number of animals kept, the shortcomings identified in the operation and effectiveness of the control system at these facilities do not allow the CCA to provide guarantees that they are under adequate control, and thus to provide assurances that they meet relevant equivalent EU standards.

The report contains recommendations to the competent authorities to address the identified shortcomings.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
Acopio	Horse assembly centre
AMI	*Ante-mortem* inspection
2011 Audit	DG(SANCO)2011-6143 in order to evaluate the operation of controls over the production of fresh ovine meat, horse meat and casings destined for export to the EU, as well as certification procedures
2016 Audit	DG(SANTE) 2016-8854 in order to evaluate the operation of controls over the production of and the certification procedures for fresh meat from *bovidae* and wild *leporidae* destined for export to the EU
2018 Audit	DG (SANTE)2018-6459 in order to evaluate the control system in place governing the production of food of animal origin (horse meat) intended for export to the EU
AVOA	Official verification activities of the HACCP programmes *(Actividades de verificacion oficial para el APPCC)*
BSE	Bovine spongiform encephalopathy
CA(s)	Competent authority(ies)
CCA	Central Competent Authority
CCP	Critical Control Point
CSED	Final health certificate for export (*Certificado Sanitario de Exportaciones Definitivo*)
CSEP	Provisional health certificate for export (*Certificado Sanitario de Exportaciones Provisional*)
CUIG	Unique livestock identification key *(Clave única de identificación ganadera)*
DG Health & Food Safety	Directorate-General for Health and Food Safety of the European Commission
DNICA	Food Safety and Quality National Directorate *(Dirección Nacional de Inocuidad y Calidad Agroalimentaria)*
DNSA	Animal Health National Directorate *(Dirección Nacional de Sanidad Animal)*
DT-e	Electronic animal movement document (*Documento para el Tránsito Electrónico de Animales*)
EE	Electronic file
EU	European Union
EU-listed establishments	Establishments approved by the competent authorities for participation in the EU export chain and from which imports into the EU are allowed
FAO	Food of animal origin

FBO(s)	Food business operator(s)
FMD	Foot and Mouth Disease
GMP	Good Manufacturing Practices
HACCP	Hazard Analysis and Critical control Points
OA(s)	Official auxiliar(ies)
OV	Official veterinarian
PMI	*Post-mortem* inspection
RASFF	Rapid Alert System for Food and Feed
RCA	Regional competent authority
RENSPA	National Sanitary Register for Agriculture and Livestock Producers *(Registro Nacional Sanitario de Productores Agropecuarios)*
RS	Regional supervisor
SENASA	National Service of Agri-Food Health and Quality *(Servicio Nacional de Sanidad y Calidad Agroalimentaria)*
SIGCERT	Integrated management system for certification (of exports) – *(Sistema Integrado de Gestión de Certificación)*
SIGICA	Integrated Management System for Agri-Food Safety and Quality *(Sistema Informatico de Gestion de Inocuidad y Calidad Agroalimentaria)*
SIV	Veterinary Inspection Service (*Servicio de Inspección Veterinaria*)
SIGSA	Integrated Management System for Animal Health *(Sistema Integrado de Gestión de Sanidad Animal)*
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedures
SUR	Single Registration System *(Sistema Único de Registros)*
TRI	Individual Registration Card *(Tarjeta de Registro Individual)*

1 INTRODUCTION

The audit took place in Argentina from 26 February to 10 March 2020, in line with the planned audit programme of the Directorate-General for Health and Food Safety (DG Health and Food Safety) of the European Commission.

The audit team comprised two auditors from the DG Health and Food Safety. The audit team was accompanied during the whole audit by representatives of the Central Competent Authorities (CCA) the National Service of Agri-Food Health and Quality (*Servicio Nacional de Sanidad y Calidad Agroalimentaria* - SENASA) - responsible for the official controls covered by the scope of the audit and by their regional and local representatives involved in the control systems.

An opening meeting was held on 26th February 2020 with the CCA. At this meeting, the audit team confirmed the objectives of, and itinerary for the audit, and additional information required for the satisfactory completion of the audit was requested. At this occasion, and in the wider context of the follow-up of a Commission audit in 2018 (DG (SANTE)2018-6459) in respect of the official controls over the production of horse meat destined for the EU, the audit team requested Senasa to include a visit to an assembly centre for slaughter horses *("acopio")*. The CCA accepted the audit team's request and the itinerary was amended accordingly.

2 OBJECTIVES AND SCOPE

The primary objective of the audit was to evaluate whether the official controls related to public health aspects and the certification system over the production of fresh bovine and ovine meat (beef and ovine meat) intended for export to the European Union (EU) provide adequate guarantees that the production of these commodities is in line with the requirements laid down in EU legislation and, in particular, are able to support the public health attestations contained in the relevant export health certificates.

In this context, the audit assessed the implementation and effectiveness of the actions provided by the competent authorities in response to the recommendations made in the reports of previous audits carried out in 2016 (ref. DG(SANTE) 2016-8854, hereafter: the 2016 audit) and 2011 (ref. DG(SANCO)2011-6143, hereafter: the 2011 audit) covering beef and ovine meat, respectively.

In terms of scope, the audit focused on:

- the organisation and performance of the competent authorities, including organization of official controls, supervision at different levels and national legislation authority for enforcement;
- the export certification procedures; and
- the official control system in place covering the production, processing and distribution chains of beef and ovine meat.

The table below lists the sites visited and the meetings held in order to achieve the above objectives:

COMPETENT AUTHORITY		
Central	2	Opening and closing meetings
Regional	3	
Local		At the holdings and establishments visited
FOOD BUSINESS ESTABLISHMENTS		
Slaughterhouses	5	Three bovine and two ovine, all of them with integrated cutting plants and cold stores.
Cutting plants	6	One stand-alone, in addition to the above ones.
Cold stores	5	Five, integrated in the slaughterhouses.
Holdings	4	Two bovine and two ovine.
Horse assembly centres *(acopios)*	1	

3 LEGAL BASIS

The audit was carried out under the relevant provisions of EU legislation, in particular, Articles 120 and 122 of Regulation (EU) 2017/625 of the European Parliament and of the Council.

A full list of the EU legal instruments relevant to the scope of this audit is provided in Annex I to this report. Legal acts quoted refer, where applicable, to the last amended version

4 BACKGROUND

According to the World Organisation of Animal Health, Argentina is officially free from foot-and-mouth disease (FMD), with a free zone with vaccination and a free zone without vaccination and it is classified as a country with insignificant risk of spongiform bovine encephalopathy (BSE).

According to Commission Regulation (EC) No 206/2010 imports of beef into the EU are allowed from all the country while imports of ovine meat are allowed from territories AR-2 and AR-4, as specified in that Regulation.

Previous Audits

The 2016 and the 2011 audits highlighted deficiencies mainly in relation to supervision, animal welfare, requirements to be met in EU-listed establishments, and information contained in the cattle database. Recommendations were made to the CCA and written guarantees, which on paper were deemed as satisfactory, were received in relation to these recommendations. These reports are published on the Commission's website at:

http://ec.europa.eu/food/audits-analysis/audit_reports/index.cfm.

Production and Trade information

The CCA informed the audit team that in 2019:

- There were 320,000 bovine farms and a bovine population of 53.801,088 animals, of which 14.065,792 destined for slaughter. Around 4% of holdings, 7% of the bovine

population, and 17% of slaughter animals were associated with/destined for the EU market; and

- There were 134,000 farms with an ovine population of 14.870,000, of which 1.048,000 animals for slaughter. Around 0.1% of holdings, 12% of the ovine population, and 40% of slaughter animals were associated with/ destined for the EU market. The ovine sector related to EU exports is entirely concentrated in the Patagonia region.

The CCA provided total production figures (in metric tonnes) exported to the EU, as follows:

Product	2017	2018	2019
Beef	32,913	34,569.63	46,778.94
Ovine/caprine meat	520	1,638.44	1,463.02

5 FINDINGS AND CONCLUSIONS([1])

5.1 LEGISLATION AND IMPLEMENTING MEASURES

Legal requirements

Article 120(2)(a) of Regulation (EU) 2017/625.

Findings

1. The CCA provided the audit team with a list and copies of national legislation and implementing measures considered to cover the main EU legal acts relevant to this audit. The following national legislation is of particular interest:
    a. Decree 4238/1968, Regulation on inspection of food of animal origin and products therefrom *(Reglamento de Inspección de Productos, Subproductos y Derivados de Origen*);
    b. Law No 18284/1969, Argentinian Codex Alimentarius (*Codigo Alimentario Argentino)*;
    c. Chapter XXVII of Decree No 4238/68 and Senasa Provision No 5/2003 on export certification procedures.
2. While the audit team did not carry out a comprehensive and detailed review of the national legislation and implementing measures, the following was noted:
    a. certain legal acts/implementing measures have been amended or were issued following the 2016 and 2011 audits. In particular, new measures and instructions on supervision and control activities to be carried out by the regional and local levels were issued after the 2011 audit (see paragraphs 17 and 18);

([1]) *The applicable control system does principally not distinguish between the production of beef and ovine meat. Therefore, most of the findings and conclusions in this section cover both categories. When different standards apply and/or the audit team observed important differences in the implementation of the rules in a specific area, this is explicitly indicated.*

b. specific legislation/measures on requirements to be met by producers involved in the EU production chain are in place. For instance, according to national rules food business operators (FBO) involved in EU exports must comply with the animal welfare requirements laid down in Council Regulation (EC) No 1099/2009;

c. certain implementing measures (e.g. see paragraph 33.b) still refer to EU legislation that was in force before 14 December 2019, when a number of changes to that legislation were adopted. However, in the cases noted by the audit team this does not have a negative impact on conditions to be met by FBO and/or official controls, as similar requirements apply.

3. The audit findings indicate that the legislation applicable to export of beef and ovine meat to the EU, is overall in line with EU rules.

Conclusions on legislation and implementing measures

4. The national laws and implementing measures applicable to exports of beef and ovine meat to the EU provide a solid basis for both official controls and enforcement where appropriate, as well as in support of the public health attestations contained in the "BOV" and "OVI" model health certificates.

5.2 COMPETENT AUTHORITIES

Legal requirements

Articles 5(1)(g) and (h), 18(1) and 120(2)(b) of Regulation (EU) No 2017/625

Findings

5.2.1 Structure and organisation

5. Senasa is a decentralized organism under the Ministry of Agriculture, Livestock and Fishing, with financial, technical and administrative independence, and with its own legal personality. In the context of this audit, Senasa is the CCA responsible for executing the national policies regarding animal health and food safety. It is also responsible for establishing the rules and procedures to be implemented in holdings and establishments eligible for EU exports, for the supervision of the control systems, the verification of the suitable implementation of the applicable legislation, as well as to oversee the imports and exports of animals and food.

6. The President and the vice-President are the Senasa highest-level authorities, under which four national and two general directorates directly resort. Of these, the national directorates for animal health (*Dirección Nacional de Sanidad Animal* - DNSA) and for food safety and quality (*(Dirección Nacional de Inocuidad y Calidad Agroalimentaria* - DNICA), are of particular relevance for this audit.

7. Senasa has a pyramidal structure with three different levels: CCA, regional competent authority (RCA) and local competent authority/ies (CAs); at all these levels, there is one sector for animal health and another one for public health.

8. The regional level is responsible for managing the territorial implementation of national legislation, and its general supervision. The regional organization of Senasa has changed since the 2016 audit in that seven regional Senasa centres cover the territory. Each regional centre is led by a director who is assisted by thematic coordinators, including one for animal health and one for food safety. The centres also have regional supervisors (RS). The RS of each area is responsible for carrying out supervision activities at holdings and establishments.

9. The regional centres are present in the territory with local offices which are responsible for the implementation of the rules and procedures issued by the CCA and RCA, through the local official veterinarians (OV). In the food safety area, the official activities at establishment level are carried out by the Veterinary Inspection Service (*Servicio de Inspeccion veterinaria - SIV*). The teams usually comprise one Principal OV (*Jefe de Servicio,* chief of service), responsible for coordination, several other OVs, and a number of official auxiliaries (OAs).

5.2.2 Legal powers, independence and authority for enforcement

10. According to the national public employment regulation framework Act (Law 25.164/1999) the civil servants are bound to refrain from taking part in any activity that could give rise to suspicion of bias, and follow the legal and regulatory provisions on incompatibility of functions/activities.

11. National legislation provides the necessary legal powers to the different levels of the CAs that allow the entry and performance of official controls at EU holdings and EU-listed establishments, as well as the authority to enforce relevant requirements in these areas.

12. At the sites visited, the audit team could confirm and obtain evidence that the CAs have the necessary powers and authority to enforce applicable legislation.

5.2.3 Training

13. Measures are in place on training for official staff, which establish conditions and instructions necessary to standardize control performance and to ensure staff's suitability and competence.

14. DNICA provided evidence of an ongoing system of continuous professional development for SIV employees. As an example, a compulsory course for official staff at EU-listed establishments on export markets and interpretation of the standards and their practical application, took place recently. The course focused on activities to check compliance with the specific requirements of the different markets in order to guarantee effective inclusion in the lists for export destinations and health certification and covered topics such as implementation of Regulation (EU) 2017/625, national measures on verification of Hazard Analysis of Critical control Points (HACCP) plans, *post-mortem* inspection (PMI) and animal welfare. The course included theory and practical hours, and a final evaluation of the participants who could download the training material from an on-line platform.

15. The Senasa staff met by the audit team during the visits were knowledgeable and aware of requirements applicable to commodities to be exported to the EU. Moreover, the audit

team saw examples that newly recruited staff received specific training on an *ad hoc* basis and that, when performance issues were noted, the corrective actions included further training when a lack thereof was identified as the cause.

16. On the basis of the above, the audit concludes that the measures announced by the CCA to address the relevant parts of recommendations No 1([2]) of the 2016 audit and Nos 1([3]) and 3([4]) of the 2011 audit, have been implemented and are effective.

5.2.4 Supervision and Audits

17. Concerning **supervision** of activities carried out by official staff at establishment level, there have been no changes since the 2016 audit: The monthly supervisory visits, carried out by RS, also include the inspection of the establishments in order to verify that the conditions and operational activities continue to meet the relevant EU standards. There are clear procedures on how the supervision should be carried out and how its outcome must be recorded in the so called "supervision form" *("parte de supervisión")* which is uploaded onto the IT-system SIGICA (Integrated Management System for Agri-Food Safety and Quality - *Sistema Informatico de Gestion de Inocuidad y Calidad Agroalimentaria)*. This allows the CCA to verify official staff performance and to be rapidly informed about problems detected at establishment level. Moreover, once a year, the RSs carry out an audit to verify compliance with HACCP requirements at establishment level.

18. The animal health section operates an equivalent system, which includes supervision of the OVs' tasks by the RS, who are responsible for a number of farms in their area of control. The RS are, in turn, supervised by the thematic coordinators.

19. **DNSA** has developed internal **audit procedures** aimed to verify that the requirements and activities to be complied with at EU primary production level, are indeed met. In this regard, the data and information concerning the holdings come from a single centralised database, fed with the information registered in the Integrated Management System for Animal Health (*Sistema Integrado de Gestión de Sanidad Animal* - SIGSA) and in the Single Registration System (*Sistema Único de Registros* - SUR) (see paragraph 40), allowing the CCA to monitor the situation of the EU holdings, and to take corrective actions if this is necessary.

20. In the food safety area **DNICA** has issued **audit procedures** in order to ensure that national legislation is implemented properly and in a harmonised way. The procedures describe the objectives, frequencies, instructions, methods, legal basis and include templates to be used, and which form part of the documentary system. EU-listed establishments must be audited bi-annually.

([2]) To bridge the gaps in the information available to the CCA in relation to official controls carried out at establishments level and to continue the re-evaluations of EU-listed establishments, in order to guarantee that all the requirements of Model "BOV" certificate of part II.1 of Annex II to Regulation (EU) No 206/2010 are met for meat exported to the EU.

([3]) To ensure that the actions announced in response to recommendations 1, 2 and 4 of the report of the previous mission (DG(SANCO)/2010-8504) are completed.

([4]) To improve the supervision and official controls carried out at establishment level to better detect deficiencies in relation to the general and specific hygiene requirements contained in the Hygiene package as laid down in Section II.1. of the relevant model Certificate laid down in Annex II of Regulation (EC) No 206/2010.

21. DNICA representatives explained that they also perform management control in the regions, based on the information registered in SIGICA. The objective of these controls is to monitor and strengthen compliance with standards, to ensure the consistent implementation in all regions, and to update on any changes in legislation, procedures and training. For this purpose, in order to target the audit activity and to optimize the use of resources, and to avail of an overview of the performance of the establishments, the CCA has developed a data analysis and management system ("control boards", *"Tableros de control"*). The use of this tool allows the CCA to verify, in real time, compliance with hygiene regulations, to visualize and integrate the data available in Senasa IT-systems, like SUR, SIGSA, SIGICA and in the integrated management system for certification (of exports) – (*Sistema Integrado de Gestión de Certificación*) - SIGCERT (see paragraphs 40, 17 and 134.b), grouping the data/information by regions and/or establishments, and to evaluate the performance of a regional thematic line.

22. At the establishments visited the audit team obtained evidence of the bi-annual CCA audits as well as the RS monthly supervisory inspections. In both cases, the conditions of the establishments and the performance of official staff were part of the audit/supervision, and which were carried out as required. Their outcome, including follow-up actions taken when non-compliances were identified, was documented and available to the audit team.

23. On the basis of the above, the audit concludes that the measures announced by the CCA to address the relevant parts of recommendations No 1(see footnote 2) of the 2016 audit and Nos 1 and 3 (see footnotes 3 and 4) of the 2011 audit are in place, and effective.

Conclusions on competent authorities

24. The competent authorities responsible for the official control system covered by the audit, are clearly **designated** and their structure and **organisation** are adequate for the performance of their tasks.

25. Officials have the **authority** to visit holdings and establishments and the power to take **enforcement** actions in case non-compliances are observed during official controls. Measures are in place for avoiding **conflict of interest**.

26. A **training system** is in place and implemented which was found to be effective in terms of the knowledge of the relevant EU requirements and their implementation by official staff, and thus effectively supports official controls.

27. The system in place includes **supervision** of the activities carried out by official staff with the objective of verifying the effectiveness of the official controls. The audit found the supervision in place to be effective.

28. An **audit system** is in place and implemented. From the findings gathered during the audit it seems to work effectively allowing the CCA: to have a reasonable level of assurance that controls are carried out correctly and uniformly, to take corrective actions if needed and to provide assurances that the performance of official staff and that the conditions of holdings and establishments involved in the EU production chain meet the EU standards.

5.3 REGISTRATION OF HOLDINGS AND APPROVAL OF ESTABLISHMENTS

Legal requirements

Article 5 of Commission Delegated Regulation (EU) 2019/625 and Article 10 of Regulation (EC) No 852/2004 of the European Parliament and of the Council.

Findings

Registration/authorisation of holdings supplying animals to EU-slaughterhouses

29. **Legislation and procedures are in place for the registration of holdings involved in the EU export chain** as well as for their suspension/removal from this circuit, when the conditions to be met are no longer complied with. Farmers met confirmed that, if they wish to supply ovine and bovine animals to EU-slaughterhouses, they must be registered in the "National Registry of Rural Establishments of Livestock Suppliers for Export Slaughter destined for the EU" at the Senasa local offices.

30. In order to register a holding, a number of documentary, technical and infrastructure requirements must be met. These requirements include:

    a. the registration in the "National Sanitary Register of Agricultural and Livestock Producers" *(Registro Nacional Sanitario de Productor Agropecuario* - RENSPA). It is an official registry, managed by Senasa, that allows to link the farmer with the type of production and location of the holding and allocate a specific RENSPA code to each producer. DNSA explained that a holding is considered as a single epidemiological unit and it is possible that different farmers (i.e. primary producers) could be part of the same holding. In these cases, each farmer must be registered separately;

    b. the maintenance of a log book for veterinary treatments; and

    c. the holding must have, among other things, fixed perimeter fences or permanent and verifiable geographic features, which guarantee the isolation of the animals present within the holding, appropriate division into paddocks (lots) depending of the type of production, guaranteed access to water for all the animals, an restricted area for veterinary products when these remain in the holding.

31. In the application for the registration as primary producer for the EU circuit, the farmer must sign a sworn declaration stating that, whenever animals are sent to EU-slaughterhouses, it will be guaranteed that they come from a holding where animals have never been treated with hormonal, anabolic, thyrostatic or any other substance with active ingredients that have an anabolic effect. The following documents must also be provided:

    a. a sketch of the holding containing the structures above described;

    b. in case of bovine holdings, a list, in electronic format, of the numbers of the identification devices applied to the animals in order to validate the ear-tags for the EU export circuit.

    c. In case of ovine holdings, a sworn statement of mark or unique identification for lambs.

Approval of establishments

32. Circular Nº 4014C/2016 lays down **requirements and procedures for the approval of establishments wishing to export to the EU market** and for their retention of the approval, in case they are already approved. A team from the CCA, which received specific training on EU legislation, is responsible for their evaluation.

33. Since September 2019 several stages of the approval procedure can be carried out on-line, allowing greater speed and efficiency. In brief, the procedure is as follows:

    a. the FBO must apply for approval for a specific commodity(ies). The application must be validated by the SIV and RS, who consider whether the establishment meets EU requirements.

    b. Afterwards, DNICA must carry out an on-the-spot visit. A specific document, which references EU legislation, must be used. In particular, the final assessment determines if the establishment complies/does not comply with the applicable, and specified, EU legislation and relevant national rules.

    c. If the outcome is favourable, a request is sent to the Commission for the inclusion of the establishment in the EU-list. If the outcome is not favourable, corrective actions and recommendations are sent back to the FBO.

    d. Once the establishment has been approved and EU-listed, it is registered in SIGICA and SIGCERT, the FBO is notified, and access to the online certification system is given. The type of commodities that can be exported is specified in these IT-systems. If an FBO was to request an export health certificate to export a commodity for which (s)he is not approved, the system would block it.

    e. The approval has a validity of two years.

34. **In order to maintain the EU-approval** of the establishment, FBOs must apply for re-approval (*"Revalidation request for export destination qualification"*) before the two years deadline expires. The same steps as above for the approval of establishments, apply.

35. When an establishment no longer complies with the conditions that allowed its initial approval and/or there is a considerable risk for food safety, the RCA or DNICA must suspend the certification, and take any additional measures they consider appropriate. If after 60 days of suspension the FBO has not corrected the problem(s) the establishment must be taken off the EU-list. Establishments can also be de-listed when they have not exported to the EU for more than two years.

36. During a visit to one establishment that had recently been included on the EU-list, the audit team could verify that the above procedure was properly followed, and that the establishment met EU standards.

37. The audit team reviewed in practice the application of the procedure to be followed when an establishment does not meet the required EU standards, and observed that it was properly implemented. In the establishment concerned, the chief of service, in agreement with the RS, decided to suspend the EU certification on the grounds that the corrective actions taken by the FBO to fix the structural/maintenance problems were not

long-lasting; the deficiencies thus passed from "non-compliance" to "non-conformity" (see paragraph 62). DNICA was informed, in order to block EU exports in SIGICA. During the next supervisory visit, the situation would be re-assessed in order to decide if the suspension could be lifted, or not. If the issues were still not resolved, DNICA would be informed and to decide whether the establishment should be de-listed or not.

38. DNICA explained that all the information from the establishments is available in SIGICA which allows them to verify centrally whether the establishments included on the EU-list maintain their compliance with the relevant EU requirements.

Conclusions on registration of holdings and approval of establishments

39. Specific legislation and procedures for the registration of holdings and approval/suspension/withdrawal of food business establishments involved in the EU export chain are in place. The procedures in place allow the CA to maintain oversight and to take appropriate actions when the conditions are no longer met. The audit found that these provisions are in line with EU standards, and properly implemented. Therefore, the system can provide assurances that holdings and establishments involved in the EU production chain meet EU requirements.

5.4 ORGANISATION AND IMPLEMENTATION OF OFFICIAL CONTROLS

Legal requirements

Article 5 of Regulation (EU) 2019/625 and Article 10 of Regulation (EC) No 852/2004.

Points II.1, II.2.6 and II.3 of the model veterinary certificates 'BOV' and "OVI" of Part 2 of Annex II to Regulation (EU) No 206/2010.

Articles 3, 5, 6, 7, and 9(a) of Regulation (EC) No 1760/2000 of the European Parliament and of the Council.

Findings

5.4.1 Organization of official controls

Controls over animal identification, movements and traceability of cattle and ovine animals

40. In order to ensure the traceability of animals, a very sophisticated IT systems has been developed:

- –SUR, where the details of the farmer (e.g. name of the owner and/or responsible person), the RENSPA code, the type of production of the holding (bovine, mixed, etc.) and details of the activity (e.g. active, closed, suspended, authorised for EU market), are registered, and
- –SIGSA is a centralised database, managed by Senasa CCA. It reports the SUR holding registration and the number of animals kept, their identification, the control of their movements (in and out the holdings) and animal health information (e.g. vaccination status, health information) are registered and available to official staff. This system contains elements relevant to the certification requirements for exporting to the EU.

41. The system in place concerning **identification** and **movement** controls of **cattle** destined to the EU production chain remains mainly as described in the 2016 audit report, and in the report of a DG Health and Food Safety audit on animal health – FMD, carried out in 2018 'ref. DG5SANTE) 2018-4016). The latter report is available at:

    https://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=4016

42. In brief, the current **cattle identification system** at EU holdings requires:

    a. the individual identification of animals, to be registered in SIGSA;

    b. depending of the zone where the holding is located, animals are identified as follows:

        i. in the free zone with FMD vaccination, it is compulsory to use a yellow button-shaped ear-tag on the right ear. A second ear-tag on the left ear is optional.

        ii. in the free zone without FMD vaccination, a green pair consisting of a card-type ear-tag on the left ear and a button-shaped ear-tag on the right ear.

    c. The supply of ear-tags must be done by manufacturers authorised and registered with Senasa. The orders, to be done through SIGSA, must specify the number of tags requested. The tag colour to be provided is assigned by the system which recognises the 3 digits verifier code of the CUIG: If starting with number "1" (i.e. area with FMD vaccination) — yellow tags; if it starts with number "2" (i.e. zone without FMD vaccination) – green tags.

    d. When the ear-tags have been applied on the animals the farmer must register them in SIGSA in order to activate them in the database([5]).

43. The **identification system of ovine animals at EU holdings**, is as follows:

    - lambs born on the farm and send to EU slaughterhouses must be identified with a unique mark (an ear-punching code) linked to the ownership of the animals and
    - animals kept at the holding for replacement (e.g. retention for reproduction, wool production) or for being subsequently dispatched to an EU slaughterhouse are identified by ear-tags with a CUIG number assigned to the whole group.
    - The holdings with ovine stocks must keep a record book of movements and stock, foliated and signed by the OV from Senasa local office, in which the following information needs to be recorded: the ear-tags received from authorized providers, and the use thereof, news of livestock stocks (births and deaths) and livestock movements.

44. The notification of births and death of animals to SIGSA is mandatory: for **cattle,** it is usually done when official FMD vaccination takes place, and for **ovine animals** twice per year (when shearing the sheep and when lambs are marked). The vast extensions of land on which the animals are reared, the presence of predators and the difficulties in

([5]) *"In their response to the draft report the competent authority noted that this registration is required for those holdings supplying animals for the EU market at their weaning or first movement, whichever occurs first."*

knowing exactly where the animals are, makes the notification in real time, practically impossible.

45. The CCA provided the audit team with updated information concerning the measures in place and data in SIGSA related with recommendation No 2([6]) of the 2016 audit. The last measures implemented in 2019 deal with the validation of ear-tags for the EU circuit. The last data on number of ear-tags and bovine animals registered in SIGSA (March 2019 and February 2020) shows that there has been a significant decrease between the difference of the number of animals and the validated ear tags in the database.

46. For the **movement of cattle and ovine animals** farmers are required to get an Electronic animal movement document (*Documento para el Tránsito Electrónico de Animales* -DT-e), which must accompany the movement of animals. The DT-e, must be requested to the Senasa local office or can be obtained on-line when the farmer uses the self-management system. It must indicate the number and category of animals to be moved, their origin and destination (i.e. the RENSPA code), the type of movement (e.g. from farm to farm or to slaughterhouse), the date of movement, the means of transport, etc.

47. In order to get the DT-e, the following conditions must be met:

    a. at origin: The producer is registered with Senasa, has an adequate stock of animals, the holding and animals complied with sanitary requirements, and there are no health restrictions in the area that prevent the movement;

    b. at destination: the producer is registered in Senasa, the holding/establishment is in sanitary conditions adequate to receive them, and there are no animal health events in the area that prevent the movement.

48. The CCA informed the audit team that the local OVs must keep the status of the holdings permanently updated in SIGSA, so that the system can block the movement of animals automatically (i.e. no DT-e can be issued) in particular circumstances (e.g. health status of the holding, movement from a non-EU holding to EU-slaughter). In addition, as all relevant information is registered in SIGSA, the system blocks the emission of DT-e when the residence requirements are not met, in order to ensure that only eligible animals are sent to the EU slaughterhouses.

49. In some provinces a document called “guide for transfer of livestock”, which certifies the ownership of the animals through marks and signs, must accompany the DT-e. However, in La Pampa, Córdoba and Santa Fé provinces, the corresponding marks and signs are recorded in the DT-e.

50. In the case of **cattle**, an Individual Registration Card (*Tarjeta de Registro Individual* - TRI), which is associated to the DT-e, is also requested for their movement. This document supports the movement of animals between holdings registered as Livestock Suppliers for Export Slaughter to the EU and must report the ear-tags numbers of the

([6]) To ensure that the information contained in the SIGSA's CDB is kept up-to-date and remains reliable in order to guarantee that the requirements in points II.2.2 and II.2.3 of the Model "BOV" certificate laid down part 2 of Annex II to Regulation (EU) No 206/2010 are met.

animals to be moved. When sending cattle to the EU slaughterhouse, the farmer must sign a document called "EU dispatch" which includes an affidavit declaring that animals meet the EU market requirements. The new measures no longer require the presence of accredited private veterinarians for the certification of the information reported in the TRI.

51. The means of transports used for the movement of animals to EU slaughterhouses must be sealed at the holding of dispatch. The details of the seals, to be numbered and requested or be validated by the Senasa local office, must be reported in the DT-e.

52. The DT-e has a maximum validity of seven days and the movements of animals must be confirmed by the receiver (holding, market/auction or slaughterhouse) in SIGSA within this period to indicate the end of the movement and, in the case of **cattle**, that the identity of the animals received coincides with the TRI. The prescription of this period is considered an infraction and whoever fails to notify the arrival of animals is blocked by SIGSA, inhibiting the emission or reception of upcoming DT-e.

53. According to national legislation, **official controls** must be carried out at holdings approved for the EU market: A 5% of the EU eligible cattle holdings and a 5% of ovine ones must be inspected annually. In this regard, there are specific **procedures, instructions and checklists** to be used during such inspections. In 2019, the checklists to be used during inspections at bovine holdings approved for the EU market were updated.

54. The controls, to be carried out by the local OVs, include: Documentary checks of DT-e, movement and stock book, requirements for EU certification, controls on use/registration of medical treatments, checks on ear-tags supply, use and activation, checks on installations, animal identification. In case of **bovine holdings** two traceability exercises must be carried out:

    a. one based on DT-e used for animals sent to an EU slaughterhouse and related TRIS. The aim is to check the compliance with residence requirements and, in case any ear-tag was replaced, verify this was done according to the rules;

    b. one for verification that the individual identification of animals correspond with data recorded in SIGSA. At least 60 animals must be checked.

55. The **outcome of official controls** must be recorded in SUR (i.e. the checklist used and non-compliances identified, if any), including photos taken during the inspection. The non-compliances detected could imply restrictions for the EU market (e.g. the system would block the emission of DT-e) or the producer could be taken off from the system.

56. DNSA explained that SUR allows them to have the overall picture, in real time, of the official controls carried out in the country: number of inspections carried out, number and type of non-compliances detected (e.g. documentation, registers, installations, traceability). In this regard, the following information was provided:

    a. currently there are 13,500 bovine primary producers registered as suppliers for EU. The outcome of official controls carried out in 2019 shows that 67% of the producers comply with the national rules applicable. In 33% non-compliances were detected and 23% of them were excluded from the EU circuit;

b. currently there are 175 ovine primary producers registered for the EU production**.** The RCA informed that the number of official controls carried out during the last years was: 10 producers in 2018, 23 in 2019 and in 2020, until the date of the audit, 24 farms. The 77% of producers inspected in 2019 showed non-compliances mainly related to the lack of registration, in the farm book, of last ear-tags applied.

57. At the cattle and ovine holdings visited the audit team observed that animals were identified in accordance with the national rules, documentation was properly kept and evidence of the official controls carried out by the OVs was available.

Control system at establishments level

58. According to national legislation, all establishments producing food of animal origin for the national market and/or to be exported must be under Senasa control. The permanent presence of Senasa officials at these establishments is compulsory, the SIV being responsible for the performance of the official tasks and controls. These requirements also apply to the EU-listed establishments, including cold stores.

59. In order to incorporate the changes introduced by the new EU regulations on official controls (i.e. Regulation (EU) 2017/625 and its implementing/delegating acts), different circulars have been issued recently. The aim of these circulars is to standardize the frequencies and procedures for official controls and provide guidelines on how the inspections at the above-mentioned establishment should be performed. For instance:

    a. Circular 4361/2019 on organization of official staff at food of animal origin establishments. According to this circular, staff from the FBO can support the OA at PMI (e.g. preparing viscera) and at cutting plants, but cannot take any decisions. This FBO staff must be authorised by Senasa and minimum competence requirements have to be met: the SIV must provide training, which includes a final examination, on general matters and on the specific tasks to be performed. The training programme is prepared by the CCA who, during the audits they carry out, check that the training took place (e.g. register of assistance and evaluation).

    b. Circular 4301A/2019 on official verification of the pre-requisites [Good Manufacturing Practices (GMP), Sanitation Standard Operating Procedures (SSOP) and Sanitation Performance Standards (SPS)], the HACCP system and animal welfare programmes. The circular includes the checklist to be used by the SIV during the official controls.

    c. Circular 4299/2018 on verification of establishments' HACCP programmes. The CCA explained that the aim of this circular is to evaluate the general effectiveness of the food safety system rather than to identify minor breaches. Therefore, it provides instructions to the SIV on how the official verification activities of the HACCP programmes (*Actividades de verificacion oficial para el APPCC* - Spanish acronym AVOA) must be done. The activities carried out by the SIV in conjunction with the RS comprise seven steps. The circular requires the use of a checklist in order to provide a record of the activities performed.

60. The CCA has established the minimum number of official staff to be allocated to each establishment, depending on the slaughter speed.

61. Dynamic frequencies have been established in order to focus the SIV's activity in the production areas and equipment (e.g. sterilisers) that represent a higher risk. For instance, the SIV must carry out the following official controls with these frequencies:

    a. daily, verification of pre-requisites and two Critical Control Points (CCP);

    b. once a year, AVOAs in establishments with one activity (a single HACCP). In establishments with several activities (more than one HACCP), the SIV must select a different HACCP each semester, given highest priority to slaughter activities;

    c. additional AVOAs can be requested by the CCA, in view of national health alerts or issued by a foreign country or any investigation that warrants it, or by the SIV when the CCP has/have been added/modified since the last AVOA;

    d. once a week, verifications related to the process control; and

    e. twice per day, and minimum five animals for slaughter day, checks for absence of the palpebral and corneal reflex after stunning.

62. The non-compliances detected during the official controls, to be recorded in the "incidences register" ("*registro de control de las operaciones*"), are classified as follows:

    a. *non-compliance*: when there is no food safety risk;

    b. *non-conformity*: documentary or operational shortcomings in the implementation of the SSOP, GMP, and/or HACCP programmes, that could imply a risk to the food; or

    c. *tendency*: a pattern of behaviour of non-compliances, non-conformities or deviations found within a process or elements of a particular environment, during a certain period of time and which indicate a direction. This trend suggests a systemic failure within a process or programme, identified during the official verification.

63. The RS must carry out monthly **supervisory visits** at establishments. Their aim is to verify that the actions taken by the SIV and the FBO correspond to the guidelines established in the current regulations and that the tasks are carried out according to the methods and procedures established by the central level. During the supervision a specific checklist must be used which, among other things, requires to check infrastructure, maintenance, good hygiene practices, training, HACCP, temperature (rooms, carcases), calibration of thermometers, etc. The verification of the corrective actions could be done by the chief of service, depending of the gravity of the deficiencies detected by the RS who must, in any case, during the next visit check whether problems previously identified were corrected or not. The outcome of the supervisions must be recorded in the *"partes de supervision"* and uploaded in SIGICA.

64. During the visit at the establishments the audit team observed that the procedures and frequencies were complied with, and that the information uploaded in SIGICA allowed

the CAs to have a clear picture of the non-compliances detected and state of play of corrective actions proposed/implemented by the FBOs (i.e. for each non-compliance observed different colours (black, green, blue and red) are allocated).

5.4.2 Specific requirements for slaughterhouses

Animal Identification controls

65. According to national instructions, the FBO must verify the identities of the animals at their arrival at the slaughterhouse. The SIV must verify the documentation that accompanies them (i.e. DT-e and for cattle also the TRI) and the accuracy of the data recorded in that documentation, in order to verify their correspondence with the animals received (i.e. marks, ear-tags). Missing or incorrect identification leads to exclusions from EU production.

66. Once the SIV grants the authorization for slaughter (see paragraph 69), the animals are introduced in the slaughter premises separated by origin. Subsequently, and in the case of cattle, the ear-tag control is carried out, verifying the correspondence between that number and the one registered in the TRI.

67. In all slaughterhouses visited, there was a suitable positive release system to ensure that all animals received *ante-mortem* inspection (AMI) by the OV before they were slaughtered for human consumption: after the SIV carries out the first AMI (see paragraph 70), the animals are arranged in pens that are identified by a card attached to the pen, called *"tarjeta de corral"*. Simultaneously, a number is assigned to the batch of animals and recorded in the card in order to ensure the traceability throughout the production. The format of the card must match the model issued by Senasa.

68. The audit team observed at the bovine slaughterhouses visited that all animals were correctly identified and were accompanied by the required documentation. Records of the controls carried out in order to verify the correspondence between ear-tags of cattle and the TRI were also available. At the ovine slaughterhouses, the animals all had their marks (see paragraph 43) and were also accompanied by the required documentation.

Ante-mortem inspection

69. In accordance with national legislation, the OV must carry out AMI on all animals destined for slaughter. No animal can be slaughtered without prior SIV authorization.

70. AMI must be carried out at different steps: at the arrival of animals at the slaughterhouse, during the time of permanence at the pens and immediately before slaughter. The examination at the pens requires the OV to check the animals in movement to appreciate possible claudication, skin injuries and any other suspicious symptoms. In case the animals cannot be inspected immediately upon arrival (e.g. days or times outside the presence of working hours of the SIV) they must be housed in the pens pending the SIV's examination. Once the inspection at the pen has been carried out, the observations must be recorded on the "*tarjeta de corral"* together with the day and time of the AMI.

71. When, during the AMI, the SIV suspects the presence of infectious-contagious disease for which the collaboration of the official laboratory is essential, the lot of animal(s) must be isolated, the places where the animals transited disinfected, the issue reported to

the immediate superior, and samples of material must be sent to the official laboratory. The animal(s) must be identified and the reason why they are classed as "suspects" recorded. Animals cannot be admitted for slaughter unless the OV has confirmed (i.e. recorded in the card), they are fit for slaughter following AMI.

72. At the slaughterhouses visited the audit team found that the above procedures were properly implemented; cards signed by the SIV authorising the slaughtering of animals as well as records of the outcome of the AMI were available.

Animal welfare at the time of slaughter or killing

73. According to national legislation, it is SIV responsibility to ensure and verify that animal welfare requirements are respected, and in EU-listed establishments they must take into account the requirements laid down in Regulation (EC) No 1099/2009. In this regard, the SIV has to verify that FBOs have their own animal welfare manual, designed taking account of the nature and size of the establishment, and that this is properly implemented. It is mandatory to use methods, equipment and procedures that ensure the effective stunning of animals and it is prohibited to shackle and hoist animals that have not been properly stunned ("0 tolerance" applies).

74. The SIV must verify, in particular, the following areas that are considered critical ones: reception and unloading of animals on arrival, handling, lairaging, moving to the stunning place, and immobilization and restraint.

75. FBOs must carry out controls on the effectiveness of stunning on all animals. The SIV must perform a daily verification, to be recorded in a specific form. In case the SIV detects non-conformities, they may stop slaughter until the necessary measures have been taken.

76. At the slaughterhouses visited the audit team reviewed the written animal welfare procedures, and observed the following:

    a. In case the animals stay over 12 hours in the lairage, water and feed should be provided. In the ovine slaughterhouses, the procedures indicated that bedding should also be given. This was not the case for the cattle ones;

    b. the maximum number of animals that each pen could accommodate was specified;

    c. in case of casualty slaughter (e.g. animals unable to walk at arrival or during their time in the lairage) the procedures require the on-the-spot stunning and, afterwards, their transport to the specific places were bleeding will take place. The CAs explained that this is allowed according to their national rules. No time limit between these two operations is indicated. In addition, the procedures do not specify that after the animal has been stunned it must be bled to death without recovering consciousness. This in not in line with EU standards: Article 4(1) of Regulation (EC) No 1099/2009 lays down that when the stunning method does not result in instantaneous death it shall be followed as quickly as possible by a procedure ensuring death, such as bleeding, pithing, electrocution or prolonged exposure to anoxia.

77. At the **bovine slaughterhouses** visited the audit team observed the following:

a. the maximum number of animals that a pen can contain was not indicated in any of the lairages, except in the last slaughterhouse visited. This in not in line with point 2.3 of Annex III to Regulation (EC) No 1099/2009;

b. in one slaughterhouse the animals had been in the lairage for more than 12 hours. Water was available but no bedding had been provided, contrary to point 1.2 of Annex III to Regulation (EC) No 1099/2009. The RCA and CCA explained that there had been discussions about the pros and cons of providing bedding. In their view, this practice is not advisable as it may compromise slaughter hygiene.

c. animals were in good condition, and washed before entering in the slaughterhouse;

d. the stunning method used was penetrative captive bolt. Back-up stunning equipment was available. The restraint and stunning were performed properly. In this regard, the measures announced by the CCA in order to address the restraining problem noted [recommendation No 3([7])] during the 2016 audit had been properly implemented and are considered effective.

78. At the **ovine slaughterhouses** visited the audit team observed the following:

a. the maximum number of animals that a pen can contain was not indicated in any of the lairages. This in not in line with point 2.3 of Annex III to Regulation (EC) No 1099/2009;

b. animals present in the lairage had been there for less than 12 hours. The OV in one of them explained that in case this time limit was exceeded, water, feed and bedding would be provided. However, concerning bedding the RCA and CCA provided the same explanation as above for bovine slaughterhouses;

c. animals were kept in good conditions;

d. the restraining and the electric stunning was done properly during the time of the visit. Back-up stunning equipment was available. However, it was noted that the devices used for stunning were not designed to give a clearly visible and audible warning if the duration of exposure falls below the required level. This in not in line with point 4.1 of Annex II to Regulation (EC) No 1099/2009;

e. the FBO's personnel checked 100% of the animals for the verification of proper stunning.

Post-mortem inspection

79. According to national rules, all carcases must undergo PMI, to be carried out by an OV with the collaboration of OA. The OAs perform this task, under the supervision of the OV, and have the obligation to inform him/her about any abnormality found.

80. The PMI comprises macroscopic visual observation, palpation and incision of organs and visceral and parietal lymph nodes and, when necessary, microscopic and/or

([7]) *To ensure that, in all slaughterhouses approved for export for EU, the animal welfare requirements are in line with Regulation (EC) No 1099/2009, in particular as regards restraining of animals and the key parameters such as position and contact surface area of electrodes.*

bacteriological examination. The head and all the organs must accompany the carcase until the final inspection point.

81. As part of the PMI, the SIV must also verify the elimination of any visible contamination on the carcases. Twice a day the OV must carry out a verification of the FBO's own HACCP-based procedures to minimize/eliminate faecal contamination on meat by checking a number of carcases on the slaughterline before they reach the chiller. In establishments exporting to the EU, this verification by the SIV must be recorded in a specific form.

82. The carcase or any part in which an injury or any abnormality is observed must be identified and diverted from the slaughter line for the OV's examination, and who decides its final destination. According to the result of the PMI the carcase and organs could be released for human consumption, be destined to other markets/uses, or disposed as unfit for human consumption.

83. The PMI findings must be registered in SIGICA including, where applicable, the seized part (organ, category, quantity, weight), the reasons and/or condition, the traceability (date and identification of the holding of origin) and destination.

84. The bovine carcases deemed fit for human consumption after PMI are sent to the room for cooling and maturation.

85. At the slaughterhouses visited the audit team observed that the PMI was carried out as described above, and in accordance to EU standards.

Bovine spongiform encephalopathy BSE

86. With regard to BSE, Argentina is classified in accordance with Decision 2007/453/EC as a country posing a negligible BSE risk. Therefore, and in accordance with the statements in the "BOV" and "OVI" model health certificates, the removal of specific risk material is not required if the meat derives from animals born, continuously reared and slaughtered in Argentina.

87. At the bovine slaughterhouses visited, the audit team observed that the spinal cord was removed from the carcases. At the ovine slaughterhouses no removal of the specific risk material took place since the animals for slaughter met the above reported conditions.

Maturation controls

88. EU-eligible bovine carcases fit for human consumption must be kept in specific rooms for a minimum of 24 hours at a temperature above +2 ° C for maturation. For each maturation room the SIV must generate a "Maturation Control Card" in order to register, monitor and check that the process has been properly followed. In particular, the following information must be recorded: number of the maturation room, destination (EU or other markets), number of carcases, temperature and time when loading started and finished and date, time and temperature of the end of the maturation process. The environmental conditions (temperature) and time must be continuously monitored and recorded to ensure compliance with the established parameters.

89. Once maturation is complete, the FBO must measure the pH of all the half-carcases. Before doing this, the FBO must check that the equipment is correctly calibrated.

90. After maturation and after FBO own checks, the SIV must check the pH value in a minimum number of carcases in order to identify any deviation and must record the verifications done in a specific pH control form. If it is found that the value obtained does not correspond to the value accepted by the country of destination, the carcase(s) must be rejected for that destination(e.g. rejection for the EU market), and the pH must be checked again in all carcases since the last calibration of the equipment was done to ensure that they meet the standard required by a specific market.

5.4.3 General requirements applicable to all establishments

Findings

Infrastructure, equipment, hygiene, maintenance, operational practices

91. The audit team observed that the conditions of the establishment as well as the hygiene practices in place were in line with EU standards. Their maintenance, with very few exceptions, was adequate. Most of the issues noted during the visits had already been identified by the OV and/or RS and actions for fixing them were taking place.

92. The audit team noted, however, some issues that had not been identified by SIV/RS:

    a. at the bovine slaughterhouses, some bunching of carcases was observed prior to PMI;

    b. although the use of sanitary filters for hands and boots was compulsory for staff accessing the production areas, the design of some of the plants allowed for workers to go directly to the toilets without removing their working overalls. Those overalls were then used again in the production area after the toilet break. This situation is not considered to represent best practice in terms of hygiene.

93. All the establishments visited have the permanent presence of OV. Records documenting the outcome of the controls carried out by SIV were provided, and which were uploaded in SIGICA. From the records available the audit team could verify that frequencies and aspects checked during the official controls (e.g. temperature of steriliser and rooms, animal welfare checks, maintenance, hygiene, etc.) were in line with national requirements, and met EU standards. Examples were also seen of non-compliances detected during the official inspections. In these cases, appropriate follow up, which includes deadlines, was initiated in order to ensure that the FBO corrected the deficiencies.

94. In some establishments good hygienic practices were noted: for instance, an alarm system requiring workers to sterilise the knives every 20-30 minutes was in place.

Hazard Analysis of Critical Control Points (HACCP)-based procedures

95. The SIV must verify the HACCP-based procedures proposed by the FBO in order to verify its compliance with the regulatory requirements, in terms of development and implementation. The implementation of HACCP and their prerequisites are controlled through the standardization of official operational and pre-operational verification activities on safety systems.

96. All establishments visited had HACCP plans in place. In general, the HACCP plans were well conceived, addressed the relevant risks and, from the records examined, the

audit team observed that they were consistently and properly implemented. Evidence was also provided that the plans were evaluated by the OV regularly and the frequencies and check list required under national rules (see paragraphs 61 and 59.c) were respected/used.

Own-check sampling

97. According to national measures, FBOs authorized for EU export must comply with provisions equivalent to the microbiological criteria and standards defined in Regulation (EC) No 2073/2005. Samples must be taken on carcases before chilling and before using lactic acid. Own-check samples can be tested in internal or external laboratories. When meat is destined for the EU, the testing methods to be used must be the ones laid down in that Regulation, and accredited.

98. It is the SIV's responsibility to verify FBOs' compliance with own-check provisions. This verification requires the OV to regularly check the sampling procedure and monitor the results of analysis carried out on monthly basis.

99. At ovine establishments the OVs informed the audit team that they take official *Salmonella* samples, in accordance with the rules laid down in Regulation (EC) No 2073/2005, to be analysed in authorised laboratories (see paragraph 128.a). The results are sent in two copies: one for the OV and one for the FBO. The FBO must carry out *aerobic colony count* and *Enterobacteriaceae* testing and the OV must verify the results and that the procedure is implemented in accordance with the rules through documentary and parallel check (i.e. official samples taken at the same time as the FBO takes their samples).

100. FBOs are also responsible for testing of water used in their establishments in order to ensure its potability and compliance with physico-chemical, organoleptic and microbiological parameters established in national legislation. It is SIV's responsibility to verify that FBO meet this obligation. In this regard, the FBO must have procedures in place detailing the sampling procedure, frequency, the sampling points to be numbered, the chlorination procedure and forms for the registration. The sampling frequency for microbiological analysis established in national rules requires FBO to test fortnightly when well water is used and monthly when they use the public water supply.

101. At the establishments visited the audit team observed:

    a. microbiological sampling plans were available. The frequencies and methods used were in line with the ones laid down in Regulation (EC) No 2073/2005;

    b. evidence was provided that the testing results were periodically checked by the SIV (i.e. the forms reporting the test results were signed by the OV);

    c. in one bovine establishment a carcase resulted positive for *Salmonella.* This event had been registered in the incidences register, as requested by national rules. Evidence was provided of the actions taken to identify the farm of origin and of the traceability exercise carried out to identify the production batch related to the carcase that had tested positive;

    d. at the ovine establishments, the SIV were in charge of taking the microbiological samples, instead of the FBO, and which were tested in official laboratories. The

CCA and RCA explained that these analyses are considered official ones. This approach, which is not required by the legislation in place, was decided in agreement with the FBOs, who pay for the testing;

e. in one bovine slaughterhouse, the SIV decided to reduce the *Salmonella* testing to 50 samples per month after the results obtained for 30 consecutive weeks were below the limits. Evidence was provided to the audit team;

f. test on water analysis were available and the sampling plan was elaborated in collaboration with the SIV in order to take into account the official sampling and thus, to avoid repetition of testing the same sampling points.

102. Concerning consignments destined for Finland and Sweden the CCA stated that special guarantees are fulfilled in relation to *Salmonella*, in compliance with the provisions of Regulation (EC) No 1688/2005. At one slaughterhouse, the audit team interviewed a RS who was found to be familiar with the specific requirements to be met when consignments are destined to these countries.

103. The CCA informed the audit team that all establishments must also carry out *E. coli* testing in accordance with national rules, applicable to meat destined to the national market.

Separation of EU and non-EU eligible animals and products

104. According to national legislation, when animals are destined for the EU, this must be specified in the documents accompanying the animals to the slaughterhouse. In this regard the CAs met explained that it is the OV's responsibility to ensure that animals/raw material entering the EU production chain are coming from "EU holdings" or "EU-listed establishments", since they must sign the EU provisional certificates (see paragraph 134.c).

105. The audit team visited some establishments that also produced beef and ovine meat for other markets (e.g. national or other third countries) and observed that procedures were in place in other to ensure proper separation between EU and non-EU eligible animals/products. For example:

a. some plants decided to produce only according to EU standards, independent of the destination, including only sourcing EU-eligible animals/raw material;

b. one slaughterhouse had two different channels, for EU and non-EU animals. The EU animals were slaughtered first. The same approach was followed in the cutting plant annexed to this slaughterhouse;

c. in one stand-alone cutting plant receiving carcases from non-EU slaughterhouses, checks were carried out in order to verify that the carcases for EU market were accompanied by a provisional EU certificate from an EU slaughterhouse.

Import controls

106. The CCA informed the audit team that no imported meat is used for products to be exported to the EU. Only meat obtained from EU establishments within the national territory can be used and the consignment must be accompanied by a provisional

certificate, declaring that relevant EU standards are met. At the establishments visited, the audit team observed that these requirements were correctly implemented.

Health/Identification marking and labelling

107. According to national rules, once PMI is carried out by the OV and if the carcases are considered as fit for human consumption, an oval health mark containing the approval number of the establishment must be applied to the carcase.

108. The FBOs placing food of animal origin intended for human consumption on the market must apply for the registration of the products as well as for the identification marks of the labels that allow the identification and traceability of their products. The registration and approval is granted at central level, allocating a unique registration number that allows the SIV to identify and verify the labels or tags used in the establishment.

109. In case of packaged meat, the boxes must bear an official seal with the indication "inspected'" and the identification of the establishment. The seals must be numbered, and procedures must be in place in case a seal needs to be replaced (e.g. the seal is broken during OV's controls).

110. The SIV must carry out a control before signing the provisional export certificate (see paragraph 134.c). In this regard, a check-list "Official Pre-shipment Verification Model" must be used. The controls require *inter alia* verification of compliance of the labelling with the country of destination's requirements, as well as the integrity of the packaging.

111. At the establishments visited, the audit team observed that carcases found fit for the EU bore the oval health mark and the products were properly labelled. In one establishment the audit team saw evidence that the procedure in place in case a seal was to be replaced –registration of the event, and retention of the broken seal(s) – was correctly applied.

Traceability

112. According to national legislation, establishments must have traceability systems in place and keep records, providing assurance that each batch was prepared in accordance with the applicable standards and allowing for a rapid recall of the lot, if necessary.

113. The SIV has to perform traceability controls, to be also registered in the Official Pre-shipment Verification Model.

114. In some of the establishments visited, the audit team carried out traceability exercises, with satisfactory results. Moreover, the situation observed at the establishment associated with iRASFF notification reported in paragraph 141, demonstrated that the traceability system put in place by the FBO was effective.

5.4.4 Official sampling

115. There is a national plan for *E. coli O-157:H7*.

116. The CCA informed the audit team that official samples must be taken for pathogens organism on final products (i.e. food safety criteria) and SIV must validate and verify the sampling carried out by the FBOs in the context of Regulation (EC) No 2073/2005.

117. Official sampling must be taken on water at the establishments, bi-annually for physical-chemical parameters and fortnightly for microbiological ones. When well water is used,

each microbiological sampling must include one sample from the well and one from a tap.

118. At the establishments visited, the audit team observed that the official sampling plans were implemented as established in the national legislation.

Conclusions on organisation and implementation of official controls

119. At central level, several national measures and instructions have been issued on how supervision and official control activities, must be performed and recorded. In particular, procedures and instructions which ensure uniformity/consistency in the performance of the controls are in place and properly implemented. In this regard, elaborate IT systems have been developed (both for the animal health area and for the public health one) allowing all the actors involved in the EU export chain to have access and record all the necessary information.

120. The control system is designed to provide assurances that products to be exported to the EU meet the applicable standards, and when non-compliances are detected the CAs take appropriate measures. In particular, the controls over the identification and movements of animals at primary production level aim to provide guarantees that animals entering the EU production chain come from EU-eligible holdings, while those at establishment level aim to avoid that non-compliant products are exported to the EU. The controls, the follow up of identified non-compliances and the enforcement measures foreseen in the control system were properly implemented and effective.

121. *Ante-* and *post-mortem* inspection of bovine and ovine animals is carried out in accordance with EU requirements and therefore the CA is in a position to certify the relevant statements in the model export certificates.

122. In general, official controls overall provide assurance that EU animal welfare requirements are respected in EU establishments. However, certain deviations from EU standards and lack of alignment with some EU requirements which were recently introduced, compromise the guarantees of the animal welfare attestation set out in the BOV and OVI model export certificates.

123. The official controls at establishments are comprehensive and correctly implemented. The structural conditions of the establishments as well as the hygienic practices observed were good, providing assurances that EU-establishments meet the relevant EU standards.

124. The official controls in place over the HACCP-programmes, animal identification, own-check sampling, maturation of bovine meat, BSE, procedures in place for segregation of EU animals and products for the EU, identification and labelling of products, and traceability are properly implemented providing assurances that officials are in a position to sign the relevant statements contained in the BOV and OVI model export certificates.

125. Own-check sampling programmes for microbiological analyses are mandatory in EU-establishments and must be supervised by the CA. In addition, the control system includes verification of microbiological analyses through official sampling, thus

reinforcing guarantees in respect of EU microbiological standards, and allowing the CAs to support the relevant statements contained in the BOV and OVI model export certificates.

126. The actions to address recommendations Nos 1 and 2 of the 2016 audit and Nos 1 and 2([8]) of 2011 audit were found to have been implemented, and effective.

5.5 LABORATORIES

Legal requirements

Article 120(2)(d) of Regulation (EU) 2017/625.

Findings

127. The CCA informed the audit team that there is a national network of laboratories approved by Senasa for the performance of analysis. Private or public laboratories can request to form part of this network. The list of laboratories within the Senasa network is available at:

(https://www.argentina.gob.ar/senasa/laboratorios/Red-nacional-de-laboratorios)

128. There are two categories of laboratories in the network:

a. *authorised laboratories*: issue test protocols based on the analysis of official samples which Senasa uses to support the certification of products controlled by them. These laboratories must meet the following conditions, amongst others:

i. be accredited under Norm ISO IEC 17025 by the Argentinian accreditation body or other Accreditation Bodies that sign the Multilateral Recognition Agreements (MLA) of the International Laboratory Accreditation Cooperation (ILAC);

ii. the methods used must be ISO accredited;

iii. they cannot carry out analysis for companies with which they maintain any type of relationship or dependency that may affect their independence of judgment;

iv. in order to get and maintain the accreditation, the Argentine Accreditation Body requires a minimum number of proficiency tests: successful participation prior to the accreditation and participation, every four years, in proficiency testing programs by inter-laboratory comparisons.

b. *Recognised laboratories:* issue test protocols for self-control, verifications carried out by the establishments within the framework of the prerequisites and HACCP systems. They must comply with the requirements of Good Laboratory Practice

129. Currently there are 23 approved laboratories for the performance of ISO analysis for the EU market.

([8]) To review all other establishments currently listed for EU approval to confirm that the requirements of the Hygiene package as required by Article 12 of Regulation (EC) No 854/2004 are consistently met.

130. Any laboratory of the network that detects prohibited substances or substances the concentration of which exceeds the legal limits, or that obtains diagnostic results that indicate the presence of reportable diseases according to current regulations and/or agents that affect animal and/or public health, must notify it immediately and within 24 hours from detection, to the Directorate of Laboratories and Technical Control and to the relevant National Directorates with a copy to their regional areas with responsibility in the specific matter (i.e. animal health or public health).

131. At the establishments visited the audit team obtained evidence that the laboratories used in the context of official sampling for EU export were authorised and the methods used were the ones laid down in Regulation (EC) No 2073/2005.

Conclusions on laboratories

132. The laboratories involved in the analysis of products to be exported to the EU are required to meet specific conditions in order to provide assurances that the analysis carry out meet EU standards, and that the results are reliable and able to support the relevant statements contained in the BOV and OVI model health certificates. Moreover, there are procedures in place for the communication of non-compliant results that allow the relevant CAs to react quickly and to take the necessary measures.

5.6 OFFICIAL CERTIFICATION

Legal requirements

Articles 88 and 89 of Regulation (EU) 2017/625.

Articles 3-7 of Commission Implementing Regulation (EU) 2019/628.

Articles 14 and 18 of Regulation (EU) No 206/2010.

Findings

133. Legislation and procedures are in place for the issuance of EU health certificates. The CCA informed the audit team that no changes have been introduced since the 2016 audit.

134. During the current audit the audit team observed the following:

a. the certification principles laid down in the EU legislation are mandatory and were implemented properly: measures are in place to provide guarantees about the authenticity of the health certificates released (e.g. letterhead, numbered pages, official stamp, registration of signature of OV authorised);

b. "SIGCERT" is fully operational and all the different steps in the certification procedure are processed through it and so, the EU export health certificates are issued electronically. This allows exporters to apply directly in the system. It is their responsibility to provide the details of the consignment (e.g. container number, number of the seal, country of destination, type and details of the establishment dispatching the consignment);

c. measures are in place to ensure that certifying officials are able to sign the statements contained in the certificates, including when the products to be

certified have not been checked by them personally. The necessary supporting documentation is managed as follows:

i. at establishment level the SIV issues a provisional health certificate for export (*Certificado Sanitario de Exportaciones Provisorio*-CSEP), necessary for the movement between authorized establishments or from an authorized establishment and the shipping point. The details of the consignment and destination must be specified. When the consignment leaves the establishment, the truck must be sealed with a numbered seal. This certificate must accompany the consignment until the place from where it will be exported;

ii. at the certification offices the Senasa OV, specifically authorised to do so issues the final health certificate for export (*Certificado Sanitario de Exportaciones Definitivo* - CSED), which replaces the CSEP and which must accompany the consignment as sanitary documentation to the destination country.

d. The request for the CSEP could be accepted or rejected automatically by SIGCER (e.g. if the request concerns the release of certificate for a country for which the establishment is not authorised, the system does not allow it).

135. National legislation prohibits the import into the country of fresh meat from countries and establishments not approved for the EU. Therefore, the fresh meat imported must be accompanied by an import certificate which specifies its origin and its eligibility, in respect of the establishments of origin.

136. At the establishments visited, the audit team obtained evidence that the system described above was properly implemented, the model of EU certificates used were in line with the ones laid down in EU legislation, the SIV were aware and understood the requirements to be met in order to release the CSEP, and all supporting documents needed for the issuance of the CSED were available.

Conclusions on official certification

137. The certification system and procedures in place are in line with the EU certification principles and are properly implemented. Moreover, officials involved in the certification chain are aware of EU requirements contained in EU certificates, in this way supporting the reliability of the EU health certificates accompanying consignments destined to the EU.

5.7 FOLLOW-UP OF RAPID ALERT SYSTEM FOR FOOD AND FEED (IRASFF) NOTIFICATIONS

Legal requirements

Article 120(1)(c) and (2)(h) of Regulation (EU) 2017/625.

Findings

138. In the last three years 25 out of 28 iRASFF notifications related to beef from Argentina were due to the presence of shigatoxin-producing *Escherichia coli*. No iRASFF notifications on ovine meat have taken place.

139. National measures and circulars regulate how the RASFF notifications received must be handled. Different directorates and services are involved in this process and a national contact point has been designated to deal with these types of notifications.

140. In brief, the procedures for the follow-up of iRASFF notifications is as follows:

    a. the contact point is responsible for sending an electronic file (EE), translated into Spanish, in order to launch an investigation. The EE must contain the relevant documentation, including all the information received from the country who launched the notification and, mainly, the following: Analytical results and methodology of the laboratory, export certificate linked to the sample, identification of each sample obtained, especially the box or package involved, the product sampled and the sample number and the lot and container data.

    b. The EE is notified to the RCA involved in the iRASFF notification, so they can launch inquiries about the possible causes at the origin of the notification. The SIV is responsible for carrying out the investigation. Once the EE is received by the SIV, the FBO is notified, requesting the corresponding actions to be taken, including the complete traceability analysis, the review of the corresponding safety programmes, and a conclusive report by the FBO.

    c. The conclusions of the investigation carried out by the SIV and RS must be reported in a technical report to DNICA, to be transmitted to the country that launched the iRASFF notification.

141. The audit team visited one establishment that had been involved in iRASFF notifications concerning presence of shigatoxin-producing *Escherichia coli*. At this establishment the audit team obtained evidence confirming that the above procedure had been followed as described. During the visit, the person responsible for dealing with iRASFF notifications:

    a. explained that they usually receive the alerts directly from the EU importer before the iRASFF notification is transmitted to the CCA, and they immediately initiate an investigation/traceability on a voluntary basis;

    b. provided evidence of the investigations and traceability exercise carried out by the establishment. The system in place also requires the inclusion of other consignments belonging to the same batch related with the iRASFF notification in the traceability exercise;

    c. noted that the cause of the alerts could not be found. However, additional measures (e.g. re-evaluation of the HACCP programme, increased the number of workers at lairage and monitoring posts, the frequency for verification of dressing of carcases passed from weekly to daily) were taken in order to avoid similar episodes; and

    d. expressed their puzzlement about the reasons for launching the iRASFF notifications and why, for the same findings, the risk decisions were different (i.e.

from "undecided" to "not serious" to "serious") and the classification of the measures taken at the EU border were equally different and inconsistent [i.e. in some cases the consignments were rejected at the border point and not in others (i.e. they were classified as "alert" or just "information for attention")].

e. expressed concern about the methodology used and the lack of serotyping from the Member states which launched the alerts, as well as in relation to the lack of response to the request of supplementary information/details concerning the RASFF notifications received.

142. The CCA also explained that in some situations they do not receive detailed information about the consignment involved in the RASFF alerts, and/or clarifications/legal basis supporting them, even if this has been explicitly requested through the official channels.

Conclusions on follow-up of iRASFF notifications

143. There is a system in place to respond to RASFF notification which requires the CAs to carry out investigations and to provide feedback to the national RASFF contact point in order to transmit this information to the Commission. The measures are adequate and implemented properly.

5.8 ADDITIONAL FINDINGS AND CONCLUSIONS ON OFFICIAL CONTROLS AT "*ACOPIOS*"

Findings

144. The audit team visited one *acopio*. During the visit it was observed that, despite the commitment from the CCA to restrict the movement of horses in and out of the *acopio*, the animals present at the facility had arrived recently, after the opening meeting day, and the ones kept before that day had been moved out. No issues were noted in respect of the horses present (i.e. all ear-tagged and in good shape/condition). Problems identified related to the absence of protection from the sun, and the limited amount of water available for the number of animals kept. The OV record of the last inspection (August 2019) did not document these issues.

145. The *acopio* visited sends around 600 horses per week to the slaughterhouse (30,000 horses per year). Despite both the large volume as well as the nature of many of these horses (at the end of their working lives), neither the operator's own controls nor the official controls in place had identified/documented any health and/or welfare issues for a prolonged period of time. Given both the volume and nature of the animals, the audit team considers the absence of any such cases, highly unlikely. The owner attributed the absence of such cases to date, to the policy of only buying fit and healthy animals.

146. The RCA, responsible for the supervision of the *acopios* and performance of the OVs at these facilities, informed the audit team that they rely on the reports drafted by the OVs during the official controls. Therefore, if no issues are reported by the OV, no supervisory visits take place. The numbers of horses through these facilities is not taken into consideration when allocating the supervisory visits.

147. The system in place does not require officials at the slaughterhouses to notify any animal welfare issues observed at AMI to staff responsible for controls at primary production level: Although the OVs record any animal welfare problems in SIGICA, the Senasa animal health colleagues do not receive this information, nor have they access to it.

148. The CCA understood the necessity to address the issue of animal welfare at primary production level, in a particular and exhaustive manner, agreeing to clear guidelines and objectives in this regard, as appropriate.

Conclusions on official controls at *acopios*

149. The system in place includes official controls at *acopios* and provides for supervision of these controls([9]). However, the issues identified during the audit show that these controls are not sufficiently effective in identifying and addressing shortcomings. In addition, the fact that the regularity of supervisory visits is entirely based on the outcome of the official controls and gives no priority to those facilities with high movements of horses calls into question their value in terms of ensuring effective controls and enforcement.

150. Moreover, the fact that valuable information on the animal welfare status of horses kept by the public health department is not transmitted/available to the animal health department represents a missed opportunity for the CCA to ensure that all relevant information is taken into account during the controls at the *acopios*.

([9]) *"In their response to the draft report the competent authority noted that the animal welfare at the level of primary production is addressed by SENASA Resolution No. 893/2018 — Regulatory framework for the provision of slaughter."*

6 OVERALL CONCLUSION

As regards the production of beef and ovine meat destined for the EU, the audit concludes that a well-designed official control system is in place and which is correctly implemented, thus providing an adequate basis to support the reliability of the attestations contained in the export certificates.

The requirements applicable to holdings and establishments involved in the production of beef and ovine meat are in line with EU standards, and are under official control. The controls were found to be overall effective, and allow the competent authorities to provide adequate assurances that products have been produced in accordance with the EU standards. In particular:

- at primary production level, the organization and implementation of the controls provide reliable assurances about the identification, movements and traceability of animals entering the EU production chain; and

- at establishment level, the official controls were effective: the structural conditions of the establishments as well as the hygienic practices observed were generally good. And, while some deviations from EU animal welfare standards that compromise the guarantees concerning the animal welfare attestation of the EU health certificates were noted at the slaughterhouses during the audit visits, the animals were properly handled and no signs of suffering were detected.

The audit also confirmed that the actions in response to the relevant recommendations from previous Commission audits in respect of bovina and ovine meat had been implemented, and were found to be effective in addressing the identified shortcomings.

Although the audit did not identify serious animal welfare issues during the visit to one acopio, apart from the lack of shade and insufficient access to water for the number of animals kept, the shortcomings identified in the operation and effectiveness of the control system at these facilities do not allow the CCA to provide guarantees that they are under adequate control, and thus to provide assurances that they meet relevant EU standards.

The report contains recommendations to the competent authorities to address the shortcomings identified.

7 CLOSING MEETING

A closing meeting was held on 10 March 2020 with CCA. At this meeting, the audit team presented the main findings and preliminary conclusions of the audit.

The representatives of CCA acknowledged the findings and conclusions presented by the audit team.

Concerning the findings and preliminary conclusions on the acopio visited the CCA stated that, in its view, the animal welfare legislation at these facilities is not covered by the statements contained in the EU health certificate. Therefore, they consider that the official guarantees provided by SENASA in the certification for exports of equine meat do not compromise EU standards. Nevertheless, the CCA recognized that the Argentinian legislation in this area is quite general and stated that, beyond what is established by the EU regulations, this topic is of great interest for their country

The CCA expressed its wish to move forward in the context of cooperation and transparency and referred to the commitments assumed within the framework of the "Administrative Arrangement on Technical Cooperation in Animal Welfare between the National Agri-Food Health and Quality Service of the Argentine Republic and DG Health and Food Safety the General Directorate of Health and Food Safety of the European Commission", signed on 22 May 2017.

8 RECOMMENDATIONS

An action plan describing the actions taken or planned in response to the recommendations of this report and setting out a timetable to correct the deficiencies found should be presented to the Commission within one month of receipt of the report.

No.	Recommendation
1.	In order to be able to support the animal welfare attestation of point II.3 of the BOV and OVI health certificates laid down in Regulation (EC) No 206/2010 the CCA should ensure that at the EU slaughterhouses the following requirements are met: a) For each pen, a visible sign should indicate the maximum number of animals to be kept, as required by point 2.3 of Annex III to Regulation (EC) No 1099/2009; b) the electrical stunning equipment must give a clearly visible and audible warning if the duration of exposure falls below the required level, as required by point 4.1 of Annex II to Regulation (EC) No 1099/2009; c) animals which are not slaughtered within 12 hours of their arrival must be provided an appropriate amount of bedding or equivalent material which guarantees a level of comfort appropriate to the species and the number of animals concerned, as required by point 1.2 of Annex III to Regulation (EC) No 1099/2009 and d) when the stunning method do not result in instantaneous death of the animal, it must be followed as quickly as possible by a procedure ensuring its death, as required by Article 4(1) of Regulation (EC) No 1099/2009. *Recommendation based on conclusion No. 122.* *Associated findings Nos: 76, 77 and* 78.
2.	The CCA should provide guarantees that the animal welfare of horses destined for EU slaughterhouses is not compromised. In particular, it should ensure that: a) when animal welfare issues are detected during the AMI at the arrival of horses at EU-slaughterhouses, this information is made available to and used by the CAs responsible for controls at facilities supplying horses to the EU establishments, in line with Article 39(2)(b) of Regulation (EU) 2019/627 and in order to allow measures aimed at preventing their recurrence and to ensure that

No.	Recommendation
	that EU animal welfare standards are met; b) the organisation and regularity of supervisory controls takes account of both the above information, as well as the animal movements through acopios; and c) that animal welfare at primary production level is addressed, as committed during the audit and at the final meeting. *Recommendation based on conclusions Nos 149 and 150.* *Associated findings Nos 144,146, 147 and 148.*

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=2020-6935

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
Dir. 98/83/EC	OJ L 330, 5.12.1998, p. 32-54	Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption
Reg. 1760/2000	OJ L 204, 11.8.2000, p. 1-10	Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97
Reg. 999/2001	OJ L 147, 31.5.2001, p. 1-40	Regulation (EC) No 999/2001 of the European Parliament and of the Council of 22 May 2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies
Reg. 178/2002	OJ L 31, 1.2.2002, p. 1-24	Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
Reg. 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Reg. 2073/2005	OJ L 338, 22.12.2005, p. 1-26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs

Reg. 2074/2005	OJ L 338, 22.12.2005, p. 27-59	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Reg. 1099/2009	OJ L 303, 18.11.2009, p. 1-30	Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing
Reg. 206/2010	OJ L 73, 20.3.2010, p. 1–121	Commission Regulation (EU) No 206/2010 of 12 March 2010 laying down lists of third countries, territories or parts thereof authorised for the introduction into the European Union of certain animals and fresh meat and the veterinary certification requirements

Reg. 2017/625	OJ L 95, 7.4.2017, p. 1–142	Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, amending Regulations (EC) No 999/2001, (EC) No 396/2005, (EC) No 1069/2009, (EC) No 1107/2009, (EU) No 1151/2012, (EU) No 652/2014, (EU) 2016/429 and (EU) 2016/2031 of the European Parliament and of the Council, Council Regulations (EC) No 1/2005 and (EC) No 1099/2009 and Council Directives 98/58/EC, 1999/74/EC, 2007/43/EC, 2008/119/EC and 2008/120/EC, and repealing Regulations (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council, Council Directives 89/608/EEC, 89/662/EEC, 90/425/EEC, 91/496/EEC, 96/23/EC, 96/93/EC and 97/78/EC and Council Decision 92/438/EEC (Official Controls Regulation)Text with EEA relevance.
Reg. 2019/624	OJ L 131, 17.5.2019, p. 1–17	Commission Delegated Regulation (EU) 2019/624 of 8 February 2019 concerning specific rules for the performance of official controls on the production of meat and for production and relaying areas of live bivalve molluscs in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council
Reg. 2019/625	OJ L 131, 17.5.2019, p. 18–30	Commission Delegated Regulation (EU) 2019/625 of 4 March 2019 supplementing Regulation (EU) 2017/625 of the European Parliament and of the Council with regard to requirements for the entry into the Union of consignments of certain animals and goods intended for human consumption

Reg. 2019/627	OJ L 131, 17.5.2019, p. 51–100	Commission Implementing Regulation (EU) 2019/627 of 15 March 2019 laying down uniform practical arrangements for the performance of official controls on products of animal origin intended for human consumption in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council and amending Commission Regulation (EC) No 2074/2005 as regards official controls
Reg. 2019/628	OJ L 131, 17.5.2019, p. 101–194	Commission Implementing Regulation (EU) 2019/628 of 8 April 2019 concerning model official certificates for certain animals and goods and amending Regulation (EC) No 2074/2005 and Implementing Regulation (EU) 2016/759 as regards these model certificates