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DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis

DG(SANTE) 2017-6261

**FINAL REPORT OF AN AUDIT
CARRIED OUT IN
BRAZIL
FROM 02 MAY 2017 TO 12 MAY 2017
IN ORDER TO
EVALUATE THE OPERATION OF CONTROLS OVER THE PRODUCTION OF BEEF,
HORSE AND POULTRY MEAT, AND PRODUCTS DERIVED THEREFROM
INTENDED FOR EXPORT TO THE EUROPEAN UNION**

Executive Summary

The report describes the outcome of an audit carried out by Directorate-General for Health and Food Safety in Brazil from 2 to 12 May 2017. The objectives of the audit were to evaluate the operation of official controls over the production of beef, horse and poultry meat and products derived therefrom destined for export to the European Union, the certification procedures the measures taken by the Brazilian authorities in response to Rapid Alert Notifications as well as in response to the recent police investigations in the meat sector, in particular in EU approved export establishments. Where relevant, the audit evaluated the follow-up actions taken by Brazilian authorities in response to the recommendations made in previous DG SANTE audit reports related to the scope of this audit.

As designed, the Brazilian official control system for the production of beef, horse and poultry meat, and products derived therefrom to be exported to the EU has the capacity to provide the necessary guarantees. However, the shortcomings detected during the audit demonstrate that, for all sectors with the exclusion of beef, the system is not fully or effectively implemented and this compromises the reliability of export certification. In particular:

- CCA has put in place audit and supervision systems aimed at verifying the effectiveness of the official controls in establishments approved for EU exports. However, because of the shortcomings in the implementation of these systems, they were found not to be effective in detecting and acting on significant non-compliances in the performance of the CAs at State/local level.*
- The competent authorities have failed to ensure that all poultry meat slaughterhouses approved for EU exports are under the supervision of official veterinarians and/or official duties have been carried out in accordance with relevant EU rules;*
- While detailed procedures exist for the de-listing of establishments intending no longer to export to the EU, the implementation of the system in place does not guarantee that the list of establishments approved for EU export and communicated to the Commission is accurate and kept up-to-date.*
- In some cases the arrangements in place do not ensure that staff performing official tasks is free from conflict of interest.*
- The competent authorities are signing export certificates despite being unable to ascertain the veracity of certain statements therein. For instance:*
 - statements in relation to horses are signed in the absence of adequate arrangements in place for traceability and absence of records of treatment of horses with veterinary drugs for the required period of six months;*
 - similarly, statements are signed in relation to poultry meat despite the absence of official veterinarian during ante and post mortem inspection in line with EU requirements and*
 - meat products are certified for export to the EU despite a lack of procedures to ensure EU-eligibility of raw materials.*

Concerning the follow up of the RASFF notifications, the system has been improved since previous DG SANTE audits and now the competent authority is able to react quickly. However, there are

lacunae with regard to:

- *rejected consignments, for which no procedures are in place to ensure that they are not subsequently re-dispatched to EU; and*
- *products from the same batch concerned by a RASFF notification for which no procedures exist to ensure that they cannot be exported before proper action is taken to ensure that food safety risks have been controlled.*

The central competent authority was found to have reacted swiftly to the police investigations, including suspension of production and certification from the export listed establishments, preventing export of non-compliant product to the EU. However, their actions were limited to the 21 establishments under police investigation and the staff involved: they carried out no investigations of linked establishments (e.g. belonging to the same food business operator) or into official staff subject to investigation working at other locations. At the time of the DG SANTE audit the central competent authority had not considered any long term actions to prevent similar situations in the future.

It is of particular concern that most of the shortcomings detected during this audit were the subject of recommendations in previous DG SANTE audits. The Brazilian competent authorities had provided written guarantees that the issues concerned by the previous recommendations had been addressed. However, the findings of this audit demonstrate that those previous guarantees were not reliable on some key EU requirements.

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

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
CCA	Central Competent Authority
CA	Competent Authority
DG(SANTE)	Directorate-General for Health and Food Safety of the European Commission
DIPOA	Department of Inspection of Products of Animal Origin (<i>Departamento de Inspeção de Produtos de Origem Animal</i>)
EC	European Community
EU	European Union
FBO	Food Business Operator
DSA	Department of Animal health (<i>Departamento de Saúde Animal</i>)
FMD	Foot-and-Mouth Disease
GTA	Transport document for animals (<i>Guia de transporte animais</i>)
HACCP	Hazard Analysis of Critical control Points
MAPA	Ministry of Agriculture, Livestock and food Supply (<i>Ministério da Agricultura, Pecuária e abastecimento</i>)
SFA	<i>Superintendência Federal de Agricultura</i>
SIGSIF	Brazilian Certification database (<i>Sistema de Informações Gerenciais do Serviço de Inspeção Federal</i>)
SIPOA	Federal Inspection Service of Products of Animal Origin (<i>Serviço de Inspeção de Produtos de Origem Animal</i>) at State level
SDA	<i>Secretaria de Defesa Agropecuária</i>
SIF	Federal inspection service (<i>Serviço de Inspeção Federal</i>)
SISBOV	Brazilian Cattle and Buffalo identification and certification system (<i>Sistema Brasileiro de Identificação e certificação de Bovinos e Bubalinos</i>)

1 INTRODUCTION

The audit took place in Brazil from 2 to 12 May 2017. This audit was added to the planned audit programme of the Directorate-General for Health and Food Safety (DG SANTE).

The audit team comprised six auditors, in three sub-teams from the DG SANTE. The audit team was accompanied during the whole audit by at least one representative of the federal competent authorities involved in the implementation of the controls covered under the scope of the audit. In addition, the availability of representatives of other (local or central) authorities involved in the control systems was ensured during the relevant part of the audit

An opening meeting was held on 2 May 2017 with the central competent authorities, the Ministry of Agriculture, Livestock and food Supply ((Ministério da Agricultura, Pecuária e Abastecimento, MAPA). 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.

2 OBJECTIVES AND SCOPE

The objectives of the audit were:

- To evaluate whether the official controls systems for poultry meat, meat preparations and products derived therefrom destined for export to the European Union (EU) can provide the guarantees required by EU legislation, in particular Commission Regulation (EC) No 798/2008 and Commission Decisions 2007/777/EC and 2000/572/EC;
- To evaluate whether the official controls systems for beef and horse meat, meat preparations and products derived therefrom destined for export to the European Union (EU) can provide the guarantees required by EU legislation, in particular Commission Regulation (EU) No 206/2010 and Commission Decisions 2007/777/EC and 2000/572/EC;
- To verify if the implementation of the official controls is effective and suitable in providing guarantees that the production of those commodities are in line with the requirements laid down in EU legislation and, in particular, are able to support the attestations contained in the relevant health certificates;
- To evaluate if the certification rules and principles offer guarantees at least equivalent to those laid down in EU legislation;
- To evaluate the measures taken by the Brazilian authorities in response to Rapid Alert Notifications (RASFF) , where relevant;
- To evaluate the measures taken by the Brazilian authorities at various levels in response to the recent police investigation in the meat sector, in particular in EU approved export establishments; including the corrective actions planned especially in relation to audits from central level; and

- Where relevant, to evaluate the follow-up actions taken by Brazilian authorities in response to the recommendations made in previous DG SANTE audit reports related to the scope of the audit.

The scope of the audit covered beef, horse meat, poultry meat, meat preparations and meat products derived therefrom.

In terms of scope, the audit focused on:

- The organisation and performance of the competent authorities, including official controls, supervision and internal audits at various levels and authority for enforcement;
- The export certification procedures; and
- The official control system in place covering the production, processing and distribution chains applicable to meat and product derived therefrom to be exported to the EU.

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

COMPETENT AUTHORITY		
Central	1	Opening and closing meetings
Regional	6	States of Goiás, Paraná, Santa Catarina, Mato Grosso, São Paulo, Minas Gerais
Local	15	In all establishments visited
FOOD BUSINESS ESTABLISHMENTS		
Slaughterhouses	13	6 for beef, 2 for horses, 5 for poultry
Cutting plants	13	Integrated to slaughterhouses
Meat preparations establishments	5	All integrated in poultry slaughterhouses
Meat products establishments	6	Two standalone and four integrated in slaughterhouses (two of them for cooked stomachs).

3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation and, in particular, Article 46 of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

A full list of the EU legal instruments referred to in this report is mentioned in the Annex to this report. Legal acts quoted refer, where applicable, to the last amended version.

4 BACKGROUND

On 17 March 2017 Brazilian Press reported of a police operation in the main meat producing States and affecting important and big companies, as well as official inspection staff of MAPA. The Commission services were immediately informed by the EU-Delegation in Brazil on the results of a two-year investigation by Brazilian police named "*Carne Fraca*" on illegal activities in the meat sector. The investigations were linked to a corruption scheme involving the MAPA. The main accusations referred to interference by some officials in facilitating or preventing official controls, in return for pecuniary and other advantages. Practices ranging from the use of ineligible meat and additives in meat products, the use of meat unfit for human consumption, non-hygienic practices, manipulation of sampling and certification, providing full access to the centralised system to issue export certificates (SIGSIF), to poultry meat with water content above the limits were, amongst others, identified. MAPA was not party to this investigation.

Following an urgent request by the Commission, the Brazilian authorities provided information on the fraudulent activities: 21 food producing establishments, of which four were listed for EU export of meat and products, in three different states were involved in the police investigation. MAPA suspended the activities in all of them and the four approved for EU exports were delisted from the EU list. Another establishment, an EU exporter of honey and apiary products, was also suspended. At the time of the current audit the police investigations in Brazil are still on-going.

Previous Audits

Previous audits covering the commodities of the current audit took place in Brazil in 2013, 2014, 2015 and 2016 (ref. DG(SANCO)/2013/6886, DG(SANCO)/2013/6703 DG(SANCO)/2014/7234, DG(SANCO)/2015/7585, DG(SANCO)/2015/7639 and DG(SANTE)/2016/8827) and the reports are published on the Commission's website at http://ec.europa.eu/food/audits-analysis/audit_reports/index.cfm.

The audits highlighted deficiencies in the control systems and made a number of recommendations to the competent authority (CA):

- In relation to horse meat, they concerned animal welfare, supervision (horse identification and traceability – Food Business Operators (FBO) own-checks), certification, swiftness and accuracy of RASSFs. Written guarantees have been received from the CA in relation to the implementation of those recommendations.
- In relation to poultry meat, problems were noted on *Salmonella* testing, ante-mortem and post-mortem inspection, Hazard Analysis of Critical control Points (HACCP) controls, animal welfare, accreditation of official laboratories, listing of establishments and actions in cases of RASFF notifications. Written guarantees were received from the CA in relation to the implementation of those recommendations and, on paper, they were considered satisfactory.

- In relation to beef meat products problems were noted on the use of ineligible meat and meat unfit for human consumption, listing of establishments not up-to-date and sampling of meat products for microbiological criteria. Written guarantees have been received from the CA in relation to the implementation of those recommendations and, on paper, they were considered satisfactory.
- In relation to beef meat, problems were noted on the implementation of the approval conditions, animal welfare and the Food Chain Information. Written guarantees have been received from the CA in relation to the implementation of those recommendations and, on paper, they were considered satisfactory.

5 FINDINGS AND CONCLUSIONS

5.1 LEGISLATION AND IMPLEMENTING MEASURES

Legal requirements

Article 46 (1) (a) of Regulation (EC) No 882/2004

Findings

5.1.1 Legislation

1. The national legislation applicable to the production and certification of products of animal origin to be exported to the EU largely remain the same as described in previous audit reports and overall they are in line with relevant EU rules.
2. However, the audit team noted some differences between Brazilian and EU requirements regarding ante-mortem, post-mortem inspections and the microbiological criteria applied for *Salmonella* on poultry meat. Some of these disparities (i.e. veterinarian ante-mortem and post-mortem inspection: tasks to be carried out by and presence of official veterinarian) were also detected during the audits in 2011 and 2013. The additional necessary administrative arrangements (e.g. instructions to staff, sometimes linked to certification instructions) are not in place to ensure that exported products meet the importing countries' requirements.
3. MAPA informed the audit teams that a new Regulation on industrial and sanitary inspection of products of animal origin (Decree No 9.013 of 29th March 2017 - RIISPOA), entered into force on 3rd April 2017. Article 73 of this Regulation stipulates that FBOs are obliged to make their staff available to assist in the official inspection, in accordance with specific rules established by the MAPA. Such rules have not been drafted yet and FBO staff currently operates in *post-mortem* inspection under an official supervision. According to the CCA, this Article provides the legal basis for the use of FBO staff to perform some official tasks in poultry, beef and horse processing establishments.

Conclusions on legislation and implementing measures

4. The Brazilian national laws and implementing measures applicable to exports to the EU are in general equivalent with the EU requirements. However, additional necessary administrative arrangements are not in place to ensure that exported products meet the importing countries' requirements and therefore, for these commodities, it cannot be guaranteed that the relevant requirements set out in the health certificate provided for in Regulation (EC) No 798/2008 are met.

5.2 COMPETENT AUTHORITIES

Legal requirements

Article 46 (1) of Regulation (EC) No 882/2004

Findings

5.2.1 Structure and organisation

Central level

5. MAPA is responsible for official controls and certification for EU export of products of animal origin.
6. By means of Decree 8.701 of 31 March 2016, the *Secretaria de Defesa Agropecuária* (SDA) and its subordinated department the Department of Inspection of Products of Animal Origin (DIPOA) were restructured. DIPOA is responsible for establishing instructions, providing training and carrying out audits over the staff operating at State (federal unit) level.

State level

7. At State level the competences of MAPA are ensured by the *Superintendência Federal de Agricultura* (SFA). The Inspection Service of Products of Animal Origin (SIPOA) is the federal level of the MAPA in the different States, acting under the structure of the SFA. The SIPOA is responsible for the organisation of the operation of inspections to be carried out by the local level (see paragraph 8) and for their supervision. It is also responsible for organising the official control programs, including determination of frequency of inspection and samplings at State level, for training of their supervisors, for compiling statistical data, calculation of risk factor for each establishment to determine the frequency of controls. In some medium sized States such service integrates additional responsibilities, such as control of food of non-animal origin.

Local level

8. At local level, the Federal inspection service (SIF) is responsible of carrying out the daily inspection tasks at establishments, which receive a SIF number when approved.

9. The organisation of the supervision in an approved SIF establishment depends on the obligation of the permanent presence of an official veterinarian (OV) or not (see paragraph 29) and therefore varies for each establishment. A team might be composed of one or more OV and official auxiliary staff when permanent presence is legally required. In the case of establishments that do not require permanent presence, an OV is designated to carry out the inspections at the determined frequency and to certify products for export.

5.2.2 Legal powers, independence and authority for enforcement

10. The Brazilian rules give the CA the necessary powers, independence and authority for enforcement of legislation and the CA can initiate proceedings for serious non-compliances. In the establishments visited the audit team found evidence of enforcement actions taken by official staff (for example, suspension of certification and detention of products). However, the findings cited in this report (see paragraph 19 and section 5.4), demonstrate that these powers are not always used effectively.
11. National rules are in place that require that staff carrying out official controls, are free from any conflict of interest. However, in two poultry slaughterhouses the audit team found that this requirement was not met (see paragraphs 33.ii, 37, 68). In addition, in some beef and horse slaughterhouses, it was also found that FBOs' staff were carrying out official tasks without supervision by the OV (see paragraph 38).

5.2.3 Resources

12. Under Brazilian rules, the permanent presence of an OV in certain establishments (e.g. red meat slaughterhouses) is required in order to guarantee that certain official tasks are carried out by him/her and certain operations are under permanent supervision. In these cases, SIF teams are assigned to the establishments for the performance of the daily inspection tasks, including pre-operational and operational checks, ante- and post-mortem inspections, etc. In plants where permanent inspection is not required (e.g. cold stores, meat processing establishments, honey establishments, etc.) the frequency of presence of an OV is sometimes limited by the availability of staff.
13. Nationally SIF carries out controls in 4849 establishments (of which 325 listed are for export to the EU) with the greatest concentration in the States of São Paulo, Minas Gerais, Mato Grosso, Santa Catarina and Mato Grosso do Sul. SIF employs 704 official veterinarians, 1616 inspection agents (official auxiliaries), 218 seconded veterinarians from States and Municipalities and 542 agents seconded from MAPA. In accordance with Article 73 of the new RIISPOA, 12,827 slaughterhouse staff are hired from the FBOs to support the SIF and they can perform official tasks, if needed, under the supervision of the SIF inspection services; these latter are also responsible for training such staff.
14. Following the police investigation, the SFA of Paraná (SFA/PR) lost 29 staff in different positions; the Superintendent was replaced by an official from MAPA of Brasilia

(appointed for 3 months) while other management and medium level positions have been provisionally filled internally. Discussions are currently on-going on how to efficiently re-organise the SFA in Paraná, in order to ensure they have enough human resources.

15. Circular (No 014/2005/DIPOA) authorises SFAs to conclude technical cooperation agreements with Municipal authorities for hiring veterinary and auxiliary staff. Both, veterinarians and auxiliaries, are considered official staff and form part of the SIF teams, working under the responsibility of the OV in charge of the SIF team. However, these veterinarians cannot issue international certificates.
16. A SIPOA service informed the audit team that the actual numbers of OVs designated in poultry establishments authorised to EU exports were insufficient for the adequate performance of SIFs' units (20 instead of 66 needed) and therefore, the presence of OVs during all the working shifts at poultry slaughterhouses cannot be guaranteed. They also noted that this problem had been repeatedly reported to DIPOA services.
17. A proposal to run a recruitment competition for 700 official staff needed for the whole Brazil is currently under discussion at MAPA level, but no decision has been taken yet.

5.2.4 *Supervision and audits*

18. DIPOA developed a system for supervision and audits as described below:
 - According to Circular No 088/2015/CGI/DIPOA/SDA of 6 November 2015, DIPOA has the obligation to carry out audits on the performance of SIPOA services at the frequency of at least two Federal States/year (out of 26 Federal States and the federal district). The audits have to include visits to establishments. The audit team noted that between 2010 and 2014 the audits carried out focused almost exclusively on the conditions at establishment level and not on the SIPOAs' performances. Audit of States has resumed since 2015. Since then, DIPOA has audited seven states; four out of them were also visited by the DG SANTE audit team (Goiás, Mato Grosso, Santa Catarina and Minas Gerais). The DIPOA audits evaluated the performance of FBOs rather than the performance of the staff performing official controls. DIPOA explained that in the future the audits will target performance of both SIPOA and SIF.
 - Memorandum No 2/2016/CGCOA/DIPOA/SDA/GM/MAPA of 18 May 2016 provides a report template to be used during the audits, and specifies also the type of establishments (e.g. beef processing establishments approved for export to the EU) to be audited together with SIPOA.
 - The SIPOA is responsible of supervising the performance of SIF staff and the supervision includes also visits at establishments in order to evaluate their conditions.
 - The supervision frequency at establishment level is the following:
 - For national market: slaughterhouses yearly, other establishments once every three years.
 - For the EU market: slaughterhouses and other establishments (beef, horse and fish sector) must be supervised minimum biannually in accordance

with Memorando Circular n. 26/2016/CGI/DIPOA/SDA/GM/MAPA of 16th March 2016. For poultry establishments, the same frequencies as for the national market are applied.

- Norma Interna DIPOA/SDA n. 02 of 8th March 2017 establishes the template to be used during SIPOA supervision in export listed establishments and their evaluation of the official controls.
- The audit team noted that different approaches are taken in the organisation of the supervisory activities carried out in the different States: SFA in Sao Paulo had instructed its teams of supervisors to make unannounced visits to establishments (both FBO and local SIF must be unaware of the date of inspection), while SFA in Minas Gerais and SFA in Paraná only inform the local SIF.
- The SIPOA supervisions cover also the certification system. However, supervision is mainly focused on traceability for a given certificate issued and it is not always able to identify the problems (see section 5.5).

19. The SANTE audit team identified the following shortcomings:

- In three of the States visited (Goiás, Minas Gerais and Santa Catarina): the planned frequency of supervision was met in 2016; in another State visited (Paraná), the planned frequency of supervision was not met in 2016 and there are strong indications that the planned frequency will not be met in the first semester of 2017 (out of 35 supervisions planned in the first quarter of 2017, only eight were carried out of which six are establishments authorized to EU exports).
- In another establishment the supervision did not cover some of the activities approved for EU export such as cooked stomachs and processing/storage of animal by-products category 3. Consequently the SIPOA did not identify that the SIF had insufficient control over the production of meat products (see paragraph 43).
- SIPOA's supervisions did not detect that the SIF failed to report that one slaughterhouse with co-located cutting plant ceased their activities in 2011 and 2015 respectively and remained included on the SIPOA and EU Commission lists of establishments authorised for EU exports. The meat products' department remained active and listed. Inspection reports were still referring to compliance for all activities. (see paragraphs 26.b and 32).
- The audit team noted that SIPOA did not ensure that sufficient enforcement actions were in place at SIF level for non-compliances identified. Non-compliances regarding SIF supervision were either not, or inadequately addressed in several establishments visited:
 - i. In one horse meat establishment the audit team noted that the SIPOA's supervision had identified non-compliances in the SIF control over the production without follow-up of the corrective actions regarding the SIFs' supervision. Consequently the same issues were identified during a next supervisory visit by SIPOA and during this audit.
 - ii. In another establishment producing canned meat products, the supervision reports by SIPOA showed that they had identified the lack of, or

inappropriate follow up related to the non-compliances detected by SIF staff during their inspections. However, no actions were taken to address all the issues (some were outstanding since 2009) (See paragraph 32). The DG SANTE audit team identified several significant non-compliances in the official control both at SIF as at SIPOA level. As a consequence of the DG SANTE audit, DIPOA suspended the certification, instructed the training of the OV and the SIPOA, and instigated a detailed follow-up of the outstanding issues in the establishment.

- SIPOA supervision reports seen by the audit team often did not mirror the real situation seen in the establishments visited: in particular, in one horse slaughterhouses, relevant structural and hygiene deficiencies, together with a serious underperformance of the local SIF team have not been adequately followed up. These deficiencies had led the SIPOA representatives accompanying the audit team to suspend production and certification for all markets. In other establishments visited, some production areas were not evaluated (e.g. meat products as cooked stomachs, casings, etc.), structural and operational (thermometers not indicating the right temperature) non-compliances were not identified or follow-up of previous non-conformities were not properly executed. (see paragraphs 43, 44, 45, 46, 47, 50 and 51).

Conclusions on competent authorities

20. The CAs responsible for the official control system over the production of bovine, horse meat and poultry meat and products thereof are clearly designated
21. The CCA has put in place audit and supervision systems aimed at verifying the effectiveness of the official controls in establishments approved for EU exports. However, these systems are not always properly implemented and therefore are not effective in detecting and acting on significant non-compliances in the performance of the CAs at State/local level.
22. The system in place grants the officials the necessary authority and powers for carrying out official controls and for taking enforcement actions in cases of non-compliances detected. However, the enforcement actions taken were not always appropriate or sufficient to ensure correction of deficiencies detected during official controls.
23. Even if measures are in place for avoiding conflict of interest of officials performing controls, the evidence gathered during the audit demonstrates that the system does not offer sufficient guarantees concerning respect of this principle.
24. The CCA has not ensured that the appropriate official staff resources are available at establishments approved for EU exports and therefore cannot guarantee that products exported to the EU have been produced in accordance with EU requirements.

5.3 LISTING OF ESTABLISHMENTS

Legal requirements

Article 12 of Regulation (EC) No 854/2004 of the European Parliament and of the Council

Findings

25. According to Circular No 029/2015/CGI/DIPOA/SDA of 26th August 2015, the procedure for delisting an export-approved establishment includes specific deadlines to be complied with. The SIF must notify the SIPOA when formally informed by the operator of any suspension (total or partial) of the activities. When 90 days have elapsed without resumption of activities, the SIPOA must notify DIPOA at central level and ask for a suspension of the export approval. If, in the following 90 days, production has not resumed, SIPOA must apply for the delisting of the premises.
26. MAPA does not keep the list of EU-approved establishment up-to-date. The DG SANTE audit team found evidence demonstrating that the communication of the changes in activities and the verification of the eligibility of establishments is deficient, both at SIF as SIPOA level:
 - a. In the State of Paraná the audit team was informed that an establishment had suspended the production in 2011 and that the operator has applied for the delisting on 1st September 2011; however, the establishment was still on the EU-list published on 6th March 2017. The CA stated that notification to the Commission services was sent on 28th April 2017 and provided documentation in regard to deletion of the plant from the national register dated 19th April 2017.
 - b. In the State of São Paulo, although the activities of slaughter and cutting were halted in 2011 and 2015 respectively, the establishment producing only canned meat products was still listed for all the activities. This situation had been identified once in the past during a SIPOA audit, but no further attention was given to inform DIPOA.
 - c. In another establishment processing horse meat and involved in the police investigation, the certification and production for export in the plant was suspended on 18th September 2015 and SIPOA performed a supervisory visit on 4-5th November 2015, requesting corrective action to be implemented by 15th January 2016. The FBO did not comply with the request and the production never resumed. SIPOA applied for the delisting of the establishment only on 10th March 2017.

In light of the above shortcomings, the implementation of procedure for (de)listing of establishments does not provide appropriate guarantees with regard to requirements of Article 12(3) of Regulation (EC) No 854/2004 which sets out that the lists of establishments be kept up-to-date and communicated to the Commission.

Conclusions on listing of establishments

27. While detailed procedures exist for delisting of establishments intending to export to the

EU, the implementation of the system in place does not guarantee that the list of establishments approved for EU export and communicated to the Commission is accurate and kept up-to-date.

5.4 OFFICIAL CONTROLS AT ESTABLISHMENT LEVEL

Legal requirements

Article 12 of Regulation (EC) No 854/2004 of the European Parliament and of the Council

Article 10 of Regulation (EC) No 852/2004 of the European Parliament and of the Council

Points II.1, II.2 and II.3 of the model certificate 'POU' of part 2 of Annex I to Commission Regulation (EU) No 798/2008

Points II.1, II.2 and II.3 of the model certificate 'BOV' of part 2 of Annex I to Regulation (EU) No 206/2010

Points II.1, II.2 and II.3 of the model certificate 'EQU' of part 2 of Annex I to Regulation (EU) No 206/2010

Points II.1 II.2 and II.3 of the model certificate MP-PREP for meat preparations of Annex II to Commission Decision 2000/572/EC

Points II.1 and II.2 of the model certificate for certain meat products and treated stomachs, bladders and intestines of Annex III to Commission Decision 2007/777/EC

Findings

5.4.1 Organisation of official controls

Based on the information provided by the competent authorities, the official controls at establishments approved for export to the EU follow the organisation described below:

28. The OV in charge of each establishment (SIF) is responsible for the implementation of an official control plan, management of work of his/her team, notification to the FBO of non-conformities detected during inspections and verification of the corrective actions taken by the FBO. During inspections standardised checklists are used.
29. A number of changes reflecting the reorganisation of the SIF and official controls has been introduced in the national law, forming the legal basis for the organisation of official controls at establishment level: With the introduction of *Norma Interna DIPOA/SDA* n. 01 of 8th March 2017 the frequency of inspections has been changed towards a risk based approach: specific frequencies are also set for verification of FBOs' own-check programmes (fortnightly for on-site verification and quarterly for documentary verification). In meat product establishments the frequency is a minimum of once every two weeks. DIPOA informed the audit team that a transitional period is currently applied to implement the new procedure. This was confirmed, on the spot, by the audit team that noted that the new frequency of inspections was not yet followed in most of the establishments visited.

30. In cases where non-compliances are detected during the official controls, SIF has to request an action plan to the FBO with agreed deadlines for its completion. If the non-compliances are detected during the SIPOA supervisory visits, the SIF has to ensure their follow-up (i.e. that the FBO implement corrective actions) and must notify the SIPOA.

The audit team identified the following:

31. In the establishments visited by the audit team, regular inspections at the minimum inspection frequency requirements have been carried out and inspection reports were available. When deficiencies were identified by the CA during an inspection visit and corrective measures were imposed, often a proper follow-up was conducted by the CA to verify that the FBO had corrected the non-compliances.
32. In one meat product establishment, the official veterinarian failed to identify certain non-compliances and to follow-up the outstanding issues since 2009 (see also paragraph 19). In addition, the use of raw material ineligible for EU production was not identified or acted upon.
33. In the case of poultry slaughterhouses the obligation for certain FBOs responsible of establishments authorised for EU exports to operate under permanent official supervision is not always met. In some establishments official veterinarians have not been assigned and in others ones they were not permanently present on site during slaughter. This not in line with Regulation (EC) No 854/2004 which requires the presence of the OV at the slaughterhouse during the ante-mortem and post-mortem inspection in order to carry out the tasks established in Annex I to this Regulation. This issue was already identified in the 2013 audit on poultry meat after which the CCA had informed the audit team that a budget authorisation was to be issued in order to recruit new additional official staff for SIFs:
- in one of the SIPOA offices visited, the audit team reviewed the data kept and noted that, as regards the official controls in the poultry sector, there was a considerable lack of resources, in particular as regards official veterinarians in SIF services. Based on the data reviewed in this office, in the establishments approved for EU exports (2 out of 16 establishments), the SIF teams do not include an OV and therefore official supervision could not be ensured. The SIPOA services explained that in these establishments OVs from establishments located in their proximity, visit these slaughterhouses when necessary (e.g. certification). However, the audit team also noted that in the majority of the poultry slaughterhouses located in this State, the number of OVs assigned was not sufficient to cover the total number of working shifts. In this regard, SIPOA noted that they were aware of the problem and DIPOA has been informed (see paragraph 16).
 - The audit team visited four poultry slaughterhouses eligible for EU exports: two under the competence of the above mentioned SIPOA office and two located in a different State. During these visits it was noted that:
 - i. in three of the slaughterhouses, the OV was not permanently present on site during slaughter (usually he/she was present for half of the working shifts);

- ii. in one of these three slaughterhouses, the SIF team comprised one OV who was replaced, during the absence periods, by a private veterinarian of the slaughterhouse company. The audit team was informed that this veterinarian, employed and paid by the company, formed part of the SIF team on a permanent basis. It was explained that they can perform official duties (e.g. ante mortem and post mortem inspection, HACCP controls) only under the supervision of the OV. It was noted that there was no official contract or other document clarifying their duties and no procedures followed in order to avoid any potential problems of conflict of interest. It should be highlighted that this slaughterhouse was one of the biggest exporters worldwide of poultry meat to the EU in 2016. As regards the use of the slaughterhouse company's veterinarian, DIPOA informed the audit team that they were unaware of such a practice and, also, that it was not in line with their national rules as it would involve problems of conflict of interest. DIPOA requested all SIF teams to exclude such private veterinarians from SIF teams and from carrying out official duties. However, it was not stated when these veterinarians (who carry out several practical duties at establishment level) would be replaced by official staff.
34. In the one of the two stand-alone meat product establishments visited, evidence was seen of the good performance of the OV, however, in the other one, in the same State, many deficiencies in the official controls were identified by the audit team in relation to identification, reporting and follow-up of deficiencies, knowledge of export requirements, certification, eligibility of raw meat to be used for production for EU. Such issues in the performance of the OV had not been identified during DIPOA/ SIPOA audits/supervision, although such audits had been carried out in this establishment (see paragraph 51).

5.4.2 *Specific requirements for slaughterhouses*

Ante-mortem inspection

35. *Ante-mortem* inspections in beef and horse slaughterhouses are usually carried out late in the afternoon, after arrival of animals, and repeated the following morning before commencing slaughter operations with “pre-clearance” by FBO staff immediately after unloading. At the slaughterhouses visited the audit team noted that generally *ante mortem inspection* was carried out appropriately by official veterinarians.
36. As regards *ante-mortem* inspections in poultry slaughterhouses, the audit team noted that it is performed by official auxiliaries or slaughterhouse staff who perform a visual inspection of the batch and not by an official veterinarian as required by Regulation (EC) No 854/2004. The OV evaluates the documentation (animal transit document - GTA) and the health bulletin and intervenes (clinical inspection of birds) only in case of problems/deficiencies being detected.
37. In relation to the above paragraph, the audit team was informed during this audit that the National legislation requires that the GTA always be signed by an accredited veterinarian

(a private veterinarian certified by MAPA for certain official tasks). However, this does not apply for the health bulletin which can be signed by a non-accredited farm veterinarian. The audit team further noted that under Brazilian legislation (Normative 20 of 2016) the accredited veterinarian is not required to visit the farm within 72 hours before slaughter in order to sign the Transport document for animals (GTA). It must be noted that the same disparities between Brazilian and EU requirements regarding ante-mortem had been detected during the audits in 2011 and 2013.

Post-mortem inspection

38. The *post-mortem* inspection in the beef and horse slaughterhouses visited was generally carried out appropriately, by auxiliary staff hired from Municipalities supervised from time to time by the OV. In addition, FBO staff gives assistance, mainly to do preparatory tasks. However in some cases FBO staff was carrying out post mortem inspection of offal.
39. The *post-mortem* inspection in poultry slaughterhouses visited is carried out by slaughterhouse staff under supervision of the OV. The audit team noted that the OV does not personally carry out a detailed inspection of a random sample, from each batch of birds having the same origin, of parts of birds or of entire birds declared unfit for human consumption as required by Regulation (EC) No 854/2004. According to the national rules such a detailed inspection needs to be carried out once per shift. The audit team further noted that this inspection could not be carried out by the OV as, in all the slaughterhouses visited, the carcasses declared unfit by the slaughterhouse staff are immediately removed from the slaughter line and are destroyed. The same finding was detected during the audits in 2011 and 2013. In the action plan provided by the CCA in response to the 2013 audit, written guaranties were provided as regards the disparities on post mortem inspection. In particular, in the reply provided to the Commission services it is written: "*DIPOA thus asserts that it maintains a permanent team in all poultry slaughterhouses that are inspected by SIF, headed by an OV who guarantees control over post mortem inspection by permanent participation in 100% of birds slaughtered.*".
40. Concerning horse meat the audit team noted that in the horse slaughterhouse visited the *Trichinella* testing equipment used did not allow for the 60 to 100 times magnification for the evaluation of suspect areas or parasite-like shapes as required by Annex I, Chapter I (o) of Regulation (EU) No 2015/1375.

Animal welfare controls

41. An Animal Welfare Officer was in charge of controls over welfare requirements in each establishment visited, carrying out random verification of the set parameters for stunning and bleeding. The audit team did not detect non-compliances. Verification of the signs of proper stunning was systematically carried out by staff in charge of hoisting stunned animals.

42. In the action plan provided by the Brazilian CA in response to one of the recommendations made on the 2013 audit on poultry meat, where animal welfare issues were identified, they informed the Commission services that MAPA had proposed a draft amendment of a National instruction. The audit team was informed during the current audit that it is at the final stage of preparation and is expected to be issued at the end of June 2017.

5.4.3 General requirements applicable to all establishments

General hygiene requirements in red meat establishments:

43. The red meat establishments visited had in general adequate facilities and equipment. Operational practices were in most cases adequate. The state of cleaning was in all establishments satisfactory with the exception of one cutting room and facilities for cooked stomachs in a beef slaughterhouse.

The audit team noted the following shortcomings:

- Maintenance issues (for example, rusty equipment, rusty overhead structures and ceilings, worn-out floors) were noticed in some of the establishments visited (two horse and one beef slaughterhouse, two beef cutting departments and two co-located facilities for cooking stomachs). One beef establishment visited presented more general maintenance deficiencies which have been partially addressed in a maintenance programme validated by the local SIF.
 - In two establishments visited, the processing area for stomachs was congested, with floor damage and condensation. These problems had been, in most cases, identified by the FBOs and by the CAs. The deficiencies in the cooking area for stomachs in one establishment were addressed shortly after the on-the-spot visit of the audit team.
 - Significant non-compliances were identified regarding maintenance of the room and equipment for producing cooked stomachs in the two establishments visited. Moreover, there was insufficient control over the production process in one of them. In both establishments, the use of hydrogen peroxide was not under control. These deficiencies have been already noted in previous Commission audits.
 - The storage facilities of another establishment were not up to EU standards.
44. Concerning the slaughter hygiene:
- It was in general satisfactory in beef slaughterhouses. However, the final washing of the carcasses was performed in a way leading to splashing and risk of cross-contamination of nearby carcasses in two slaughterhouses visited. This had been consistently overlooked by the SIF at establishment level and at the time of SIPOA supervisory visits.
 - In the horse slaughterhouses visited, the audit team noted that the search for signs of *melanosis* and *melanomata* was systematically performed on all slaughtered horses after loosening the attachment of one shoulder, where shoulders and various other

parts of the carcasses were touching platforms and equipment and giving rise to serious hygienic deficiencies.

General hygiene requirements in poultry meat establishments:

45. The audit team visited five poultry slaughterhouses of which four were listed for EU exports. The fifth one had been delisted as a consequence of the carne fraca operation. All the establishments visited were found by the audit team to be overall in line with EU hygiene requirements. However, some shortcomings were noted that had not been previously detected during SIF inspections, SIPOA supervision visits or DIPOA audits (please note that not all findings were identified in all establishments):

- maintenance problems with ceilings, walls, floors in specific areas
- potential cross-contamination of carcasses in scalding and plucking room due to inadequate separation lines between lines of feathered and already plucked carcasses,
- lack of adequate number of wash-hand-basins in cutting rooms (in all the establishments visited),
- bad hygiene practices applied by the personnel during handling of chicken meat fillets (in two establishment visited).

46. It was also noted that a system for preventing the use of food additives unauthorized in the EU, which included the examination and the approval of the production recipes used by the FBO, was implemented by the SIF. However, in one of the establishments visited the audit team noted that for the production of salted chicken fillets (meat preparations) destined for EU, a low quantity of unauthorised food additives, phosphates (0.28% of the total mix of meat in the tumbler), was used.

Hazard Analysis of Critical Control Points based systems (HACCP)

47. Evidence was available for the establishments visited that official controls cover also HACCP-based systems:

- In all establishments visited programmes based on HACCP principles were implemented.
- Verification of absence of contamination on beef carcasses and heat-treatment of the meat products was considered as a critical control point (CCP). The monitoring of the CCPs/CPs was adequate as well as the documentation of it.
- For cooked stomachs the lower limit of the CCP/CP was at least 80° C (core temperature of the product). However, a significant discrepancy (difference up to 32° C) between the thermographic and manually measured temperatures, (higher than 80° C) of the water for cooked stomachs, was noted by the audit team. Neither the FBO nor the OV had identified this situation.

Own-check sampling

48. With regard to microbiological criteria, the CA has aligned its microbiological testing frequencies and parameters for fresh bovine meat with those set out in Regulation (EC)

No 2073/2005 (Amendment of Circular No 835/2006/CGPE/DIPOA by Memorandum 371/CGPE/DIPOA/2014 of 24 October 2014).

49. In the red meat slaughterhouses visited, the OV verified the microbiological sampling of carcasses and endorsed the records provided by the FBO. The FBOs performed a trend analysis of the results. The audit team noted that there is no official instruction on how to verify the reliability and plausibility of the results presented by the FBOs. As a consequence, in one beef slaughterhouse, it was observed that the OV had not reacted when, for 15 consecutive samples for Total Viable Counts (TVC), the result was 0, which is an implausible sequence of results.
50. In all the poultry establishments visited the audit team noted that a sampling plan for *Salmonella* is carried out by the FBO in order to define the safety of the daily production. When a consignment needs to be certified for EU export the results of this plan are provided to the SIF team. It was explained to the audit team that this sampling plan is provided for in Brazil's "Program for Pathogens Reduction" (PRP) as updated with Normative 20 of 2016. The sampling plan comprises five samples of meat cuts (e.g. poultry fillets) and five samples of meat preparations (e.g. salted fillets), which are randomly collected during the day. This is not in line with Chapter 3.2 of Annex I to Regulation (EC) No 2073/2005, which requires, for fresh poultry meat other than poultry carcasses, the collection of five samples of the same batch, in order to define the acceptability of the batch. The audit team was further informed by the SIF teams in the establishments visited that in their opinion the daily production comprise several batches (usually four batches per day as a batch is defined per line and per shift).

Separation of EU and non-EU eligible animals and products

51. In all establishments systems to separate of EU and non-EU eligible animals and products are in place. However, in two meat producing establishments visited the control system did not ensure that in all cases only EU eligible raw material is used for the production of meat products intended for export to the EU. For example:
 - the segregation of the production of raw material to be used for the production of EU eligible meat products was not ensured;
 - the EU eligibility of the meat and mechanically separated meat used was not always verified;
 - the exclusion of ineligible types of meat (kidneys and trimming of the sticking point) was not ensured; and
 - mistakes on EU eligibility in the national sanitary certificates were made.

These deficiencies were not reported in any SIPOA or SIF control reports but were identified during previous Commission audits.

Identification marking and labelling

52. In all establishment visited, packages of meat were marked with an identification mark in accordance with Section I of Annex I to Regulation (EC) No 853/2004. All boxes of chilled and frozen product are sealed with a sticker which contains the identification number of the establishment and a serial number for control purposes. It was also noted that the intermediate products were identified and the final products correctly labelled.
53. In all establishments visited where raw meat was received from other slaughterhouses, the internal health certificates were present, indicating if the meat was eligible for EU production, including the code of the origin in relation to the regionalisation as per Commission Decision 2007/777/EC and if its use was limited to production, with a few exceptions and human errors.

Traceability

54. The audit team verified the traceability of meat and products thereof covered by the scope of this audit at different establishments visited. It was noted that all FBOs have traceability procedures in place. The traceability was generally ensured for the production of fresh beef, horse and chicken meat and chicken meat preparation. However, the following deficiencies in the control system, which were not reported in any SIPOA or SIF control reports, were identified by the audit team:
- a. In one slaughterhouse, the control system did not ensure that only “high quality beef” was included for export.
 - b. With regard to traceability of live horses received by both slaughterhouses visited, the reliability of the information available concerning the origin of the animals, records of medical treatments, time of identification and residency requirements could not be demonstrated.

Conclusions on official controls at establishment level

55. As designed, the Brazilian official control system for the production of beef, horse and poultry meat, and products derived therefrom to be exported to the EU could be capable of providing the necessary guarantees. However, the shortcomings detected during the audit demonstrate that, for all sectors with the exclusion of beef, the system is not fully or effectively implemented and this compromises the reliability of export certification, in particular:
- The system in place does not guarantee that establishments exporting poultry meat to the EU are under the supervision of an official veterinarian or that ante mortem and post mortem inspection is performed in accordance with EU rules, nevertheless the CA was signing certificates confirming the EU requirements have been completed which were factually incorrect.
 - Enforcement measures are not always properly applied.
 - Traceability of live horses and the separation of EU and non-EU eligible products was not reliable.

- The sampling plans used for *Salmonella* detection in poultry meat are not in line with relevant EU requirements.
- *Trichinella* examination in horse meat is not carried out in line with EU requirements due to failures in the technical equipment and the CA was signing the EQU export certificates despite this.

56. As a result the CA is not in a position to guarantee that the relevant export requirements are met.

57. In general, official controls can guarantee that EU animal welfare requirements are met for animals entering the EU production chain.

5.5 OFFICIAL CERTIFICATION

Legal requirements

Article 6 of Directive 96/93/EC.

Article 14 of Regulation (EC) No 854/2004.

Article 4.1 of Regulation (EU) No 798/2008, Articles 14 and 18 of Regulation (EU) No 206/2010, Article 4 of Decision 2000/572/EC, Article 4 of Decision 2007/777/EC.

Findings

58. The DIPOA issued Memorandum No 138 GAB/DIPOA/2014 of 15 April 2014, which has revised/updated the manual for the application, verification and issuance of international and national sanitary certificates and transit documents through the Federal Inspection Service Management Information System (SIGSIF). The manual explains step by step the procedure to follow for the application, verification and issuance of certifications and transit documents. According to this procedure, FBOs wishing to export products to the EU must apply for health certification to the SIF. The request should include all the relevant supporting documentation related to the consignment to be exported including the ante-mortem and post-mortem inspection documentation, sampling results, temperature sheets, packing lists, weight, traceability information and notification of loading.

59. SIGSIF allows the production of two prints of the certificate: one to be stamped as 'original', the other as 'copy'. The audit team noted that although the SIGSIF does not allow for more than one copy of the issued certificates to be printed, the OV may electronically save a copy outside the system as PDF document. This was the case in one establishment visited. This practice is not officially foreseen in the concept of SIGSIF.

60. SIGSIF does not allow changes to issued certificates and in such cases the certificates must be cancelled and replaced. The official who issues the EU certificate must manually

enter the certificate number. For other export markets, however, such as the USA and Canada, the system automatically generates the certificate number.

61. Amendments to commercial parts of the certificates e.g. incorrect container number may be made by means of corrective letter. This modified information on the consignments is not available in the SIGSIF system. These corrective letters may be issued by other officials, than those assigned to issue certificates in the SIGSIF system. As a consequence, by consulting the SIGSIF system before signing, it is not apparent that modifications took place and have been validated.
62. The certificates are no longer printed on security paper; instead authentic codes are allocated systematically to the signed certificates once the certificate is signed. A contingency procedure for issuing certificates outside the SIGSIF system, which includes the allocation of authentic codes, is in place in case the SIGSIF system is off-line. In case access is technically not possible, the DIPOA may authorise the issuing of certificates outside the SIGSIF system.
63. SIPOA/SISI/SIFISA assigns only official veterinarians to issue certificates in the SIGSIF system. The assignment may be for one or more SIF establishments. The assigned officials could therefore sign certificates remotely. Official model certificates are also available on line and could be completed at any time.

Certification of beef

64. In the beef processing establishments visited the certification was in line with the requirements, with good traceability and reconciliation of quantities of beef cuts. However, the pre-loading verification of the consignment being certified was sometimes done by FBO's staff, and not by an OV/Official auxiliary as required.

Certification of Horse meat

65. The certification procedures observed during the audit team visits to the both horse slaughterhouses were satisfactory from the point of view of internal traceability and reconciliation of quantities of meat cuts, including average yields.
66. However, the guarantees provided about the six months medical treatments records were not supported by the documentation provided by the farmers (out of ten affidavits on medical records checked by the audit team, in nine cases the statement that the horses have been kept in the same holding for six months before dispatch could not be confirmed by the queries carried out in the database of the official services). Thus, the CA was signing EU-export certificates for horse meat containing statements it was not in a position to verify.
67. The FBO representatives stated that audits on suppliers have started to be carried out in 2017, instructing them how to provide the necessary supporting documentation: currently, about 12 suppliers (farmers) have been audited out of ca. 60. On-the-spot, both the FBO and the CA committed to urgently correct the deficiencies starting from the next

consignments of live horses. However, the guarantees provided to the audit team at the time of the closing meeting were not satisfactory and the CCA suspended the certification of horse meat destined to the EU with immediate effect.

Certification of Poultry meat/poultry meat preparations

68. In one poultry slaughterhouse visited, the audit team noted that the preparation of the required documentation was carried out by the private slaughterhouse veterinarian (see also paragraphs 33.i and 36) who was responsible for verifying the accuracy of the data when the OV was absent. These certificates were signed later by SIPOA based on this documentation. This is not in line with Article 3(4)(a) of Directive 96/93/EC as certifying officers must not certify on the basis of data ascertained by a person not authorized by the competent authority (see paragraphs 33.i and 36) and, moreover, who was not acting under the control of the official veterinarian. Moreover, the certifying officer could not verify the accuracy of the data.
69. The audit team noted that in some establishments authorised to export poultry meat to the EU the presence of the OV is not always guaranteed (see paragraphs 16, 33 and 36). Therefore, in these situations the certifying officers are not in a position of certifying the relevant statement contained in the export certificate.

Certification of meat products

70. Multiple errors were identified in issuing certificates at one establishment producing canned meat products. The majority of the certificates with mistakes were for commercial samples only. More than one original certificate was issued for the same consignment.
71. In addition, errors were identified in other establishments: certificates for meat products were issued mentioning the wrong heat treatment, or in absence of supporting documentation from the establishment of origin for the meat used in the production. The certificates were issued once the consignment had already left Brazil, or the wrong model certificate was used for export to one Member State. None of these issues were reported in the 2016 and 2017 supervisory reports of SIPOA, although being included in the standard report template.

Conclusions on certification

72. Brazilian rules on certification are generally in line with the EU certification principles and a procedure for issuing of EU health certificates has been developed. However, the shortcomings observed in their implementation result in a situation where the CA was signing certificates containing statements it was not in a position to verify or which were not true in particular concerning:
- The reliability of the traceability and absence of records on treatment of horses with veterinary drugs for the period of six months.
 - The veterinary presence of an official veterinarian during slaughter of poultry and

the duties in regard to ante and post mortem inspection.

- The official status of the person signing the certificate.
- The eligibility of the raw material for meat products.

5.6 REACTION TO RASFF NOTIFICATIONS

73. Brazil has a history of numerous RASFF notifications in the past years, mainly in poultry meat preparations, with presence of *Salmonella spp.* The reaction and follow-up in the past was slow and did not lead to a significant reduction in the number of RASFF, in particular for poultry meat preparations.

	2015	2016	2017 until 20/3/2017 ¹
Poultry meat (mainly meat preparations)	37	24	23
Bovine meat (mainly fresh meat)	15 (of which 4 for corned beef)	6	0
Horse meat	0	2	0

74. DIPOA informed the audit team that a new manual of procedures for follow up to International Notifications is applied as of Circular No 1/2016/DIPOA/SDA/MAPA to enable the CAs to respond quickly. According to it, when a RASFF notification is received by the DIPOA services, it is transmitted to the SIF authority responsible for the official controls of the implicated establishment via the SFA. The SIF immediately requires the FBO of the establishment to carry out an investigation in order to identify the causes of the notification with a deadline of 10 days. The results of this investigation and the corrective measures adopted are evaluated by the SIF, before being transmitted and further assessed by the SIPOA and the DIPOA services. A final report is provided to the International Notification body (e.g. EU) in a timeline of 20 days in case of microbiological risks and within 30 days for physical and chemical risks.

75. The audit team was informed that in cases of establishments with an increased number of RASFF notifications, the DIPOA or the SIPOA schedule inspection visits on the spot. The audit team saw evidence of such inspection visit carried out by DIPOA in 2016 in reaction to a significant number of RASFF notifications (*Salmonella spp.* in poultry meat preparations) in the establishment involved. Significant findings in their report seen, did not justify the positive conclusion on the end of the report.

¹ Before the start of reinforced sampling procedure at the EU Border inspection posts, as per Article 24 of Council Directive 97/78.

76. The audit team reviewed the actions taken by the CA in one EU-listed beef establishment that was involved in 2015-2016 nine RASFF notifications for presence/suspected presence of shigatoxin-producing *Escherichia coli* in beef. The action plan proposed and implemented by the FBO received a favourable opinion from the local SIF inspection team, and was then forwarded through DIPOA to the EU Commission services. The establishment has not been implicated any further RASFF notification since January 2017.
77. In three poultry establishments visited, with a high number of recent RASFF notifications, the audit team reviewed the documentation of the new procedures and noted that they are followed as described. As regards the action plans provided by the FBOs, it was noted that:
- A comprehensive investigation had been carried out by the FBOs in order to confirm the causes of the contamination. In all the cases examined the main cause identified was related to the farm level and the identification of the positive *Salmonella* flocks.
 - In two out of the these three establishments, the FBOs did not carry out further investigations at slaughterhouse level in order to identify other possible sources of contamination, in response to the repeated cases of RASFF notifications. In both cases the FBO reviewed the cleaning plan of the processing plant. The audit team noted that in these slaughterhouses some important contamination points exist (e.g. close proximity between feathered carcasses after slaughter and carcasses after de-feathering and washing, carcasses that came in contact with surface of equipment, bad hygiene practices). These issues were not detected neither during the SIF inspections nor during the SIPOA annual supervision visits.
 - In two out of the three poultry establishments, no further interventions in order to mitigate the risk of *Salmonella* contamination of final products in the process line (e.g. to reducing the speed of the slaughter/process line, emptying/cleaning of the cooling immersion tanks between the work shifts, increasing the number of samples analysed) were considered necessary.
 - In one poultry establishment, the FBO had decided to suspend the export to the EU of specific products (meat preparations) by his own initiative and to increase the number of samples taken before the dispatch of other exported products.
78. In relation to actions taken by the SIF in these three establishments, the audit team noted that:
- All the FBO's' action plans had been evaluated positively. The verification of the implementation of these plans was part of the routine inspection of the establishment as no additional official controls had been initiated by SIFs in response to the increased number of RASFF notifications.
 - In one establishment, the SIF team had imposed, on a temporary basis, the analysis of FBO's samples to be carried out in official laboratories, in order to ensure the validity of results. This is line with the new procedures issued by the DIPOA regarding the prevention of *Salmonella* contaminated exported products. DIPOA

carried out also an audit on the spot and a specific action plan was requested by the FBO in response to the RASFF notifications. Due to the several non-compliances detected, the DIPOA decided to impose a precautionary suspension of exports to EU. This suspension lasted 12 months until corrective actions were implemented. However, the audit team noted that the export suspension imposed did not include the existing stock of products produced before the date of suspension, allowing the FBO to dispatch products to the EU during the suspension period. As a result, additional RASFF notifications were issued and consignments were rejected (as *Salmonella* positive) during the suspension period (and for a period of 4 months). The audit team further noted that suspension of exports was also imposed in 2014 and 2015 and, at that time, the stock was included in the suspension decisions. The CAs explained to the audit team that there are no specific instructions on this issue and it is up to the inspection team to decide on a case by case basis.

79. The audit team reviewed the actions taken by the CAs in the case of consignments of poultry meat and meat preparations rejected at the EU border controls due to a RASFF notification. It was noted that:
- the procedures followed, based on Ordinance No 183, consider these consignments as products imported in Brazil. The SIF teams explained that these consignments are physically checked and are sampled when necessary (e.g. when contaminated with *Salmonella*). If the consignment is found to be in compliance, it comes again in the possession of the FBO;
 - there were no specific legislation/instructions for official staff and/or FBOs on how to treat these consignments. It is up to the OV, based on their own technical knowledge, to take decisions. Re-dispatch to the EU would be possible and, in this case, a new International Certificate needs to be issued.
 - It was noted that the SIF cannot take actions on the rest of the products belonging to the same batch as the one subject to the RASSF. When these products had been dispatched to other establishments (e.g. cold stores) the SIF cannot impose their recall.
 - In one establishment, 10 consignments had been rejected from the EU border controls recently and, after having been released by the SIF, these consignments had been dispatched to several cold stores (without the issuance of new National Certificates) waiting for an FBO's decision regarding their final destination. These consignments still bore information on their packages stating that they were destined for EU export. The audit team was further informed that an authorisation for market re-direction is only needed when the product is to be re-dispatched to the same establishment where it was originally produced. When it is to be dispatched to another establishment (e.g. a cold store) such authorisation is not required.
80. The DIPOA services informed the audit team that they have acknowledged the above mentioned problems in the system and would consider introducing a new procedure in order to improve it (e.g. blocking the re-dispatch of these products through SIGSIF). In the meantime, as a reactive response, the DIPOA services has issued the circular No

9/2017 (dated 9 May 2017) according to which the FBO involved in RASFF notifications, must notify to the SIF, in a timeline of 72 hours, all the products of the same batch and must recall them in case they had been already dispatched.

Conclusions on reaction to RASFF notification

81. Recent improvements in the system for communication, investigation and reporting of RASFF notification have allowed to reduce the response time and to structure and verify the actions to be taken.
82. While several actions have been taken by DIPOA concerning *Salmonella* RASFF notifications, the shortcomings in CA controls at slaughterhouse level, the CA does not verifies that the FBO identifies all the possible causes of contamination and that comprehensive actions to prevent recurrences of *Salmonella* contamination in meat preparations are consistently taken.
83. The CA cannot provide guaranties that rejected consignments will not be re-dispatched to the EU. Moreover, the system does not guarantee that products, that are part of the same batch rejected, will not be exported to the EU. The CAs acknowledged the problem and initial corrective actions are being taken/planned to address the situation, but it is too early to assess the effectiveness of this response.

5.7 COMPETENT AUTHORITIES' RESPONSE TO THE RECENT POLICE INVESTIGATIONS IN THE MEAT SECTOR

84. After the communication from the police, MAPA verified the technical aspects of the "*Carne Fraca*" investigations, offering clarifications and correcting technical mistakes and/or misunderstandings.
85. The official measures taken by MAPA focused mainly on the 21 establishments under police investigation and on the persons involved in the police investigation:
 - Four out of these 21 establishments were authorised for exports of meat/meat products to the EU. On 20th March MAPA communicated to all the local SIF services SIF that the certification for products produced and processed from raw material originating in all the 21 establishments under investigation was suspended. Products were allowed to be freely circulated in Brazil accompanied by certificates for the national market and after a favourable test result.
 - On the administrative side 33 competent authority officials from different levels of the hierarchy (super-intendants, heads of inspection services, local inspectors) have been dismissed/suspended and replaced. The majority were in the State of Paraná (29), and the Head of SIPOA of Goiás. Currently 87 persons, including industry personnel, are the subject of police investigations.

86. On the technical side the CA has taken the following measures since the investigation became public:

- The CA created a special task force to organise, guide, and perform the specific tasks in an independent way, separate from their normal activities. They are carrying out audits in all the 21 establishments under police investigation including the four exporting to the EU, carrying out case file investigations. More than 600 official samples of products produced in these establishments have been, taken - mainly at retail level, and analysed in official laboratories. Non-compliances were identified in 10% of the cases.

87. The audit team was informed that:

- The current system in place, as such, provides some measures to mitigate such events like unannounced supervisory visits by State level auditors (SIPOA) or agreement from central level to change inspectors to prevent replacement on demand of third parties (e.g. food business operators- FBOs).
- Since 2015 a system of administrative measures has been initiated to increase the integrity, internal compliance and ethical conduct in all Brazilian government ministries. It covers internal audits, rules for identifying and avoiding conflict of interest, developing codes of conduct, penalties and sanctions for staff. In addition, partnerships with industry in this Pro-Ethic programme (very recently including agro-alimentary associations) are stimulated. Between 2015 and 2016 MAPA services has audited eight states, but, although deficiencies had been identified, in particular in the Paraná State, no measures were taken.
- Measures to resume certification for export will be based on a favourable audit result, a fully implemented corrective action plan, sampling of products and the appointment of a new local CA team where relevant.
- In three out of the four meat establishments exporting to the EU, the CA identified no irregularities.
- Considering that the police investigation questioned the reliability of one in-house laboratory in a poultry slaughterhouse, which was operating also for another establishment from the same group, MAPA decided, from 17/3/2017, that the testing for *Salmonella* could no longer be carried out in this laboratory neither for own-checks nor for the official sampling.

88. The audit team noted:

- The CCA has not initiated fundamental changes in the organisation of the official controls and supervision to ensure that the problems could be identified in other establishments and do not arise again in the future. Neither was information or guidance given to the staff to enhance awareness of the underlying problems.
- Limited additional specific measures have been taken, such as revision of some decisions taken by officials under police investigation. A Provisional Revision of the Decree to increase the level of fines in case of illegal activities has been issued.

89. The CCA concluded that the irregularities uncovered by the police investigations were the result of the illegal behaviour of a limited number of official staff in a limited number of establishments. As a consequence the CCA did not consider it necessary to launch additional investigations into linked establishments (e.g. belonging to the same food business operator or through official staff subject to investigation working also in other locations).

Conclusions on competent authorities' response to the recent police investigations in the meat sector

90. The CCA reacted swiftly to the police investigations. However, the actions were limited to the establishments under police investigation and the staff involved-

91. The-CCA deemed it unnecessary to investigate further in other establishments or to take measures to prevent similar situations in the future. Long term actions involving the whole meat sector and staff have not been considered.

6 OVERALL CONCLUSIONS

As designed, the Brazilian official control system for the production of beef, horse and poultry meat, and products derived therefrom to be exported to the EU could be capable of providing the necessary guarantees. However, the shortcomings detected during the audit demonstrate that, for all sectors with the exclusion of beef, the system is not fully or effectively implemented and this compromises the reliability of export certification. In particular:

- CCA has put in place audit and supervision systems aimed at verifying the effectiveness of the official controls in establishments approved for EU exports. However, these systems are not always properly implemented and therefore are not effective in detecting and acting on significant non-compliances in the performance of the CAs at State/local level.
- The competent authorities have failed to ensure that all poultry meat slaughterhouses approved for EU exports are under the supervision of official veterinarians and/or official duties have been carried out in accordance with relevant EU rules;
- While detailed procedures exist for the approval and listing of establishments intending to export to the EU, the implementation of the system in place does not guarantee that the list of establishments approved for EU export and communicated to the Commission is accurate and kept up-to-date.
- In some cases the arrangements in place do not ensure that staff performing official tasks are free from conflict of interest;
- The competent authorities are signing export certificates despite being unable to ascertain the veracity of certain statements therein. For instance:
 - statements in relation to horses are signed in the absence of adequate arrangements in place for traceability and absence of records of treatment of

- horses with veterinary drugs for the required period of six months;
- similarly, statements are signed in relation to poultry meat despite the absence of official ante and post mortem inspection and
- meat products are certified for export to the EU despite a lack of procedures to ensure EU-eligibility of raw materials.

The Brazilian national laws and implementing measures applicable to exports to the EU, are in general equivalent with the EU requirements. However, additional necessary administrative arrangements are not in place to ensure that exported products meet the exporting countries' requirements and therefore, for these commodities, it cannot be guaranteed that the relevant requirements set out in the health certificate provided for in Regulation (EC) No 798/2008 are met.

Concerning the follow up of the RASFF notifications, the system has been improved since previous DG SANTE audits and now the competent authority is able to react quickly. However, there are lacunae with regard to:

- rejected consignments, for which no procedures are in place to ensure that they are not subsequently re-dispatched to EU; and
- products from the same batch concerned by a RASFF notification for which no procedures exist to ensure that they cannot be exported before proper action is taken to ensure that food safety risks have been controlled.

The central competent authority was found to have reacted swiftly to the police investigations, including suspension of production and certification from the export listed establishments, preventing export of non-compliant product to the EU. However, their actions were limited to the 21 establishments under police investigation and the staff involved: they carried out no investigations of linked establishments (e.g. belonging to the same food business operator) or into official staff subject to investigation working at other locations. At the time of the DG SANTE audit the central competent authority had not considered any long term actions to prevent similar situations in the future.

It is of particular concern that most of the shortcomings detected during this audit were the subject of recommendations in previous DG SANTE audits. The Brazilian competent authorities had provided written guarantees that the issues concerned by the previous recommendations had been addressed. However, the findings of this audit demonstrate that those previous guarantees were not fully reliable.

7 CLOSING MEETING

A closing meeting was held on 12 May 2017 with MAPA. At this meeting, the audit team presented the main findings and preliminary conclusions of the audit and advised the central competent authorities of the relevant time limits for the production of the report and their response.

The representatives of MAPA acknowledged the findings and conclusions presented by the audit team. In addition, information on action already taken and planned, in order to address particular findings in the establishments visited, was provided, in particular the delisting and suspension of the certification of two establishments, correction of maintenance problems in two other establishments.

8 RECOMMENDATIONS

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

No.	Recommendation
1.	<p>To re-inforce the audits/supervision at all levels of administration in order to ensure that the guarantees given by the CA while signing the certificates are correct.</p> <p><i>Recommendation based on conclusions Nos. 21, 22, 24, 56 and 72</i></p> <p><i>Associated findings Nos. 18,19, 32, 33, 34, 43, 51, 54</i></p>
2.	<p>To ensure that measures in place for avoiding conflict of interest of officials performing controls, offer sufficient guarantees to respect this principle.</p> <p><i>Recommendation based on conclusions No. 23</i></p> <p><i>Associated findings Nos. 33ii, 37 and 68</i></p>
3.	<p>To ensure that the raw material used for meat products destined for EU export meet the requirements for fresh meat as stipulated in Section VI of Annex III to Regulation (EC) No 853/2004 and does not include meat unfit for human consumption, as defined in Chapter V of Section II of Annex I to Regulation (EC) No 854/2004.</p> <p><i>Recommendation based on conclusions No. 55</i></p> <p><i>Associated findings No. 51</i></p>
4.	<p>To ensure that official supervision and permanent presence during slaughter by an official veterinarian and that ante mortem and post-mortem inspection is carried out in accordance with Regulation (EC) No 854/2004. In particular, requirements laid down in point B.1. (a) Chapter II Section I of Annex I and paragraph 1 Part B Chapter V, Section IV of Annex I to Regulation (EC) No 854/2004 shall be taken into account (checks to be carried out personally by the official veterinarian).</p> <p><i>Recommendation based on conclusions No. 55</i></p> <p><i>Associated findings Nos. 12, 16, 33, 36 and 39</i></p>

No.	Recommendation
5.	<p>To ensure that appropriate measures are taken to avoid that consignments part of batch subject to RASFF are re-exported and certified as being compliant without verification and corrective action.</p> <p><i>Recommendation based on conclusions No. 82, 83</i></p> <p><i>Associated findings No. 78, 79</i></p>
6.	<p>To ensure that all the elements necessary to guarantee the requirements for certification of live horses destined for slaughter for export to the EU, as laid down in Model "EQU" in Part II of Annex II to Regulation (EU) No 206/2010, are available and verified by the certifying officer. In particular, official controls over dealers and holdings supplying horses for slaughter shall be carried out regularly, to ensure that the sworn statement in regard to medical treatments of live horses in their six months preceding slaughter is authentic.</p> <p><i>Recommendation based on conclusions Nos. 55 and 56</i></p> <p><i>Associated findings No. 19 and No. 54, 66</i></p>
7.	<p>To ensure that Trichinella testing equipment is brought in line with the requirements of Regulation (EU) No 2015/1375.</p> <p><i>Recommendation based on conclusion No. 55</i></p> <p><i>Associated findings No. 40</i></p>
8.	<p>To ensure that the lists of approved establishments exporting to the EU are kept up-to date.</p> <p><i>Recommendation based on conclusion No. 27</i></p> <p><i>Associated finding No. 26</i></p>
9.	<p>The CCA should ensure that the sampling plan for Salmonella in poultry meat intended for export to the EU is equivalent to that in points 1.28 of Annex I to Regulation (EC) No 2073/2005.</p> <p><i>Recommendation based on conclusion No. 55</i></p> <p><i>Associated finding No. 50</i></p>

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=2017-6261

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
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. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Reg. 882/2004 - Article 46 (TC)	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
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. 1664/2006	OJ L 320, 18.11.2006, p. 13-45	Commission Regulation (EC) No 1664/2006 of 6 November 2006 amending Regulation (EC) No 2074/2005 as regards implementing measures for certain products of animal origin intended for human consumption and repealing certain implementing measures
Reg. 1881/2006	OJ L 364, 20.12.2006, p. 5-24	Commission Regulation (EC) No 1881/2006 of 19 December 2006 setting maximum levels for certain contaminants in foodstuffs
Reg. 798/2008	OJ L 226, 23.8.2008, p. 1-94	Commission Regulation (EC) No 798/2008 of 8 August 2008 laying down a list of third countries, territories, zones or compartments from which poultry and poultry products may be imported into and transit through the Community and the veterinary certification requirements
Reg. 1069/2009	OJ L 300, 14.11.2009, p. 1-33	Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (Animal by-products Regulation)

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. 1169/2011	OJ L 304, 22.11.2011, p. 18-63	Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004
Reg. 2015/1375	OJ L 212, 11.8.2015, p. 7–34	Commission Implementing Regulation (EU) 2015/1375 of 10 August 2015 laying down specific rules on official controls for <i>Trichinella</i> in meat
Dir. 96/22/EC	OJ L 125, 23.5.1996, p. 3-9	Council Directive 96/22/EC of 29 April 1996 concerning the prohibition on the use in stockfarming of certain substances having a hormonal or thyrostatic action and of beta-agonists, and repealing Directives 81/602/EEC, 88/146/EEC and 88/299/EEC
Dir. 96/23/EC	OJ L 125, 23.5.1996, p. 10-32	Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC
Dir. 96/93/EC	OJ L 13, 16.1.1997, p. 28-30	Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products
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

Dir. 2002/99/EC	OJ L 18, 23.1.2003, p. 11-20	Council Directive 2002/99/EC of 16 December 2002 laying down the animal health rules governing the production, processing, distribution and introduction of products of animal origin for human consumption
Dec. 97/747/EC	OJ L 303, 6.11.1997, p. 12-15	97/747/EC: Commission Decision of 27 October 1997 fixing the levels and frequencies of sampling provided for by Council Directive 96/23/EC for the monitoring of certain substances and residues thereof in certain animal products
Dec. 2007/777/EC	OJ L 312, 30.11.2007, p. 49-67	2007/777/EC: Commission Decision of 29 November 2007 laying down the animal and public health conditions and model certificates for imports of certain meat products and treated stomachs, bladders and intestines for human consumption from third countries and repealing Decision 2005/432/EC
Dec. 2000/572/EC	OJ L 240, 23.9.2000, p. 19-24	2000/572/EC: Commission Decision of 8 September 2000 laying down animal and public health conditions and veterinary certification for imports of minced meat and meat preparations from third countries and repealing Decision 97/29/EC