



United States Department of Agriculture

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Food Safety and  
Inspection Service

MAR 20 2020

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

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

Dear Ing. Carlos Paz,

The United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS) conducted an on-site verification audit of Argentina's inspection system from December 2 through December 6, 2019. Enclosed is a copy of the final audit report. The comments received from the Government of Argentina are included as an attachment to the report.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michelle Catlin".

Michelle Catlin, PhD  
International Coordination Executive  
Office of International Coordination

Enclosure

FOLLOW-UP REPORT OF AN AUDIT CONDUCTED IN

ARGENTINA

DECEMBER 2–6, 2019

EVALUATING THE FOOD SAFETY SYSTEMS GOVERNING

MEAT

EXPORTED TO THE UNITED STATES OF AMERICA

March 20, 2020

Food Safety and Inspection Service  
United States Department of Agriculture

## Executive Summary

This report describes the outcome of a targeted on-site equivalence verification audit conducted by the United States Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) from December 2 - 6, 2019. The purpose of the audit was to verify the implementation of the Central Competent Authority (CCA) proposed corrective actions in response to FSIS' February 25 – March 15, 2019 audit findings, in order to determine whether Argentina's food safety inspection system governing meat remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. Argentina currently exports raw intact and fully cooked, not shelf stable ready-to-eat (RTE) beef to the United States.

The targeted follow-up audit focused on two system equivalence components which had systemic findings documented in the prior FSIS audit: (1) Government Oversight (e.g., Organization and Administration) and (5) Government Chemical Residue Testing Programs.

The FSIS auditor concluded that Argentina's meat inspection system is organized to provide ultimate control, supervision, and enforcement of regulatory requirements. The CCA has implemented measures to ensure the use of government employees for all post-mortem inspection of livestock intended for export to the United States. In addition, the CCA has implemented measures to ensure system-wide controls prohibiting the analysis of counter-samples following a violative chemical residue testing result.

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## I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) conducted an on-site audit of Argentina’s food safety system from December 2 - 6, 2019. The audit began with an entrance meeting held on December 2, 2019, in Buenos Aires, Argentina, during which the FSIS auditor discussed the audit objective, scope, and methodology with representatives from the Central Competent Authority (CCA) – the National Service of Animal Health and Agro-Food Quality (SENASA). Representatives from SENASA accompanied the FSIS auditor throughout the entire audit.

## II. AUDIT OBJECTIVE, SCOPE, AND METHODOLOGY

This was a targeted follow-up on-site equivalence verification audit. The audit objective was to verify the implementation and effectiveness of the CCA’s proposed corrective actions in response to the February 25 - March 15, 2019, FSIS audit’s systemic findings to determine whether the food safety system governing meat remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. As a result of the targeted approach of this audit to verify implementation of corrective actions, not all aspects of the SENASA inspection system were audited. Argentina is eligible to export the following categories of products to the United States:

Process Category	Product Category	Eligible Products <sup>1</sup>
Raw – Intact	Raw intact beef	Boneless manufacturing trimmings; carcass (including halves or quarters); cuts (including bone in and boneless meats); edible offal; other intact; and primals and subprimals.
Raw – Non-Intact	Raw ground, comminuted, or otherwise non-intact beef	Beef patty product; bench trim from non-intact; formed steaks; ground beef; hamburger; non-intact cuts; sausage; and trimmings from non-intact.
Fully Cooked – Not Shelf Stable	Ready-to-eat (RTE) fully-cooked meat	Diced/shredded; ham patties; ham, not sliced; ham, sliced; hot dog products; meat and non-meat component; nuggets; other fully cooked not sliced product; other fully cooked sliced product; parts;

<sup>1</sup> All source meat used to produce products must originate from eligible countries and establishments certified to export to the United States. For processed meat products, meat includes the following species: beef, goat, lamb, mutton, pork, and veal.

Process Category	Product Category	Eligible Products <sup>1</sup>
		patties; salad/spread/pate; and sausage products.
Fully Cooked – Not Shelf Stable	RTE Meat Fully-Cooked Without Subsequent Exposure to the Environment	Diced/shredded; ham patties; ham, not sliced; ham, sliced; hot dog products; meat and non-meat component; nuggets; other fully cooked not sliced product; other fully cooked sliced product; parts; patties; salad/spread/pate; and sausage products.

The USDA’s Animal and Plant Health Inspection Service recognizes Argentina as negligible risk for bovine spongiform encephalopathy. The regions consisting of the areas of Patagonia South and Patagonia North B are the only regions recognized as free of foot-and-mouth disease, as specified in Title 9 Code of Federal Regulations (CFR) 94.1(a)(1); however, the importation of meat and other animal products from these regions into the United States is subject to restrictions specified in 9 CFR 94.11. Importation of fresh (chilled or frozen) beef from the northern region of Argentina into the United States is allowed if requirements specified in 9 CFR 94.29, in addition to other applicable requirements, are met.

Prior to the targeted follow-up on-site equivalence verification audit, FSIS reviewed and analyzed Argentina’s responses to the 2019 FSIS audit findings and supporting documentation. During the audit, the FSIS auditor conducted interviews, reviewed records, and made observations to verify implementation of Argentina’s proposed corrective actions in response to the prior 2019 FSIS audit findings. Determinations concerning program effectiveness focused on performance within the following two equivalence components with systemic audit findings identified in the prior 2019 FSIS audit: (1) Government Oversight (e.g., Organization and Administration) and (5) Government Chemical Residue Testing Programs.

The FSIS auditor reviewed administrative functions at the CCA headquarters and two local inspection offices within the audited establishments. The FSIS auditor evaluated the control systems in place that ensure the national system of inspection, verification, and enforcement is being implemented as intended.

The FSIS auditor visited a sample of two beef slaughter and processing establishments from a total of 15 establishments certified as eligible to export to the United States. The products these establishments produce and export to the United States include fully cooked, not shelf stable RTE beef and raw intact beef. During the establishment visits, the FSIS auditor paid particular attention to verifying that only government inspection personnel are assigned to perform all inspection activities including post-mortem inspection.

Additionally, FSIS audited one chemical residue laboratory to verify its ability to provide adequate technical support to the food safety inspection system. The FSIS auditor focused on

verifying that official chemical residue results are final, and that no retesting of confirmed violative samples is performed.

Competent Authority Visits	#	Locations
Central Competent Authority	1	<ul style="list-style-type: none"> <li>• SENASA, Buenos Aires</li> </ul>
Laboratories	1	<ul style="list-style-type: none"> <li>• Laboratorio Xenobióticos (private residue), Buenos Aires</li> </ul>
Beef slaughter and processing establishments	2	<ul style="list-style-type: none"> <li>• Establishment No. 189, Sociedad Anonima Importadora y Exportadora de la Patagonia, Salto</li> <li>• Establishment No. 1920, Frigorifico Rioplatense S.A.I.C.I.F., Tigre</li> </ul>

FSIS performed the audit to verify the food safety inspection system met requirements equivalent to those under the specific provisions of United States’ laws and regulations, in particular:

- The Federal Meat Inspection Act (21 United States Code [U.S.C.] Section 601 *et seq.*); and,
- The Meat Inspection Regulations (9 CFR Parts 301 to the end).

The audit standards applied during the review of Argentina’s inspection system for meat included: (1) all applicable legislation originally determined by FSIS as equivalent as part of the initial review process, and (2) any subsequent equivalence determinations that have been made by FSIS under provisions of the World Trade Organization’s *Agreement on the Application of Sanitary and Phytosanitary Measures*.

### III. BACKGROUND

Except for export volume, there were no changes noted in the background information provided in the October 7, 2019, final FSIS audit report. From August 1, 2016 to August 31, 2019, FSIS import inspectors performed 100 percent reinspection for labeling and certification on 1,393,476 pounds of beef exported by Argentina to the United States. FSIS also performed reinspection on 192,440 pounds at point-of-entry for additional types of inspection, including testing for chemical residues and microbiological pathogens including Shiga toxin-producing *Escherichia coli* (STEC), *Listeria monocytogenes*, and *Salmonella* species, of which a total of 18,600 pounds were rejected for detection of STEC O26.

Each of the two components that was assessed during this targeted follow-up on-site audit includes a description of the equivalence criteria, the findings from the February 25 - March 15, 2019, on-site audit, and the FSIS auditor’s verification results and observations from the December 2019 follow-up audit. The FSIS auditor verified that the corrective actions in response to the previously reported findings were implemented and effective in resolving the findings.

The previous audit in 2019 identified the following findings:

<b>Summary of Findings from the 2019 FSIS Audit of Argentina</b>
<b>Component One: Government Oversight (e.g., Organization and Administration)</b>
<ul style="list-style-type: none"><li>The CCA uses designated establishment personnel (nongovernment employees) to conduct post-mortem inspection examination. These personnel are assigned by the establishment to work under the direct supervision of a government veterinary inspector, but the designated personnel are establishment employees whose salaries are paid by the establishment. The number of government employees is determined by how many government employees are available to work. If the government has enough staff, they will staff with government inspectors. If they do not have enough government inspectors, they will use the designated establishment employees for the vacant positions.</li></ul>
<b>Component 5: Government Chemical Residue Testing Programs</b>
<ul style="list-style-type: none"><li>The CCA's national chemical residue plan has provisions in place that allows chemical residue samples with confirmed violative or unacceptable test results to be re-analyzed to negate previous confirmed violative or unacceptable test results.</li></ul>

The FSIS auditor verified that the corrective actions for the previously reported findings were implemented and effective in resolving the findings.

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

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

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

The FSIS February 25 - March 15, 2019, audit identified the following finding:

- The CCA uses designated establishment personnel (nongovernment employees) to conduct post-mortem inspection examination. These personnel are assigned by the establishment to work under the direct supervision of a government veterinary inspector, but the designated personnel are establishment employees whose salaries are paid by the establishment. The number of government employees is determined by how many government employees are available to work. If the government has enough staff, they will staff with government inspectors. If they do not have enough government inspectors, they will use the designated establishment employees for the vacant positions.

As a result of the audit finding, FSIS sent a letter to SENASA on April 29, 2019, requesting that SENASA provide documentation that demonstrated the use of government inspection personnel to perform inspection activities. In response, on May 31, 2019, SENASA sent a letter and supporting documentation demonstrating the authority to hire new official veterinarians and official auxiliaries for the performance of inspection verification activities and post-mortem inspection in all establishments certified as eligible to export to the United States.

SENASA's response to the draft final audit report on July 31, 2019, included *Service Order N° 01/2019*, issued on July 1, 2019, that provided instructions for the assignment of assistants provided by the establishments to ensure government oversight, and *Circular N° 4361*, issued on July 16, 2019, that addressed staff coordination during official controls. FSIS review of the submitted documents was followed with a bilateral technical teleconference on August 30, 2019. On September 9, 2019, SENASA submitted additional clarifying documents and records demonstrating the requirement for the exclusive use of government inspection personnel in the performance of ante-mortem inspection, post-mortem inspection, and all other verification activities in establishments certified to export to the United States.

SENASA has submitted updated instructions to its inspection personnel and establishments certified to export to the United States requiring that only government inspection personnel perform inspection activities in establishments certified to export to the United States during the production of product intended for export to the United States. SENASA also submitted supporting documentation demonstrating that all establishments certified to export to the United States now have the necessary official staffing to guarantee that only government inspection personnel are performing inspection activities during the production of products intended for export to the United States.

At SENASA headquarters, the FSIS auditor verified implementation of newly issued circulars, staffing rosters at all establishments certified to export to the United States, training materials, and training records for newly hired employees. The FSIS auditor reviewed records in SENASA's document management system, *Gestión Documental Electrónica* (GDE), that demonstrated regional supervisors had received and follow the new requirements for exclusive use of government inspection personnel in establishments certified to export to the United States. During site visits of two establishments certified to export to the United States, the FSIS auditor reviewed inspection personnel records, staffing records, and training records. In addition, the FSIS auditor observed and verified the proper implementation of post-mortem inspection examinations by newly hired government inspection personnel.

The FSIS audit confirmed that SENASA has implemented the corrective actions described to FSIS to ensure that all post-mortem inspection activities are performed exclusively by government inspection personnel. The FSIS auditor concluded that the CCA's food safety inspection system has the organizational structure to provide ultimate control, supervision, and enforcement of regulatory requirements for this component.

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

This component was not assessed during the current targeted follow-up audit because no systemic audit findings were identified during the previous audit.

**VI. COMPONENT THREE: GOVERNMENT SANITATION**

This component was not assessed during the current targeted follow-up audit because no systemic audit findings were identified during the previous audit.

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

This component was not assessed during the current targeted follow-up audit because no systemic audit findings were identified during the previous audit.

**VIII. COMPONENT FIVE: GOVERNMENT CHEMICAL RESIDUE TESTING PROGRAMS**

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

The FSIS February 25 - March 15, 2019, audit identified the following finding:

- The CCA's national chemical residue plan has provisions in place that allows chemical residue samples with confirmed violative or unacceptable test results to be re-analyzed to negate previous confirmed violative or unacceptable test results.

In response to the FSIS audit finding, SENASA submitted a revised *IP03v04, Sampling on Animals Intended For the USA*, that includes reference to *Circular Letter N° 4011/2012*, from the Directorate for Health and Quality of Products of Animal Origin. Both documents explicitly state that every violative test of products to be exported to the United States is final and livestock producers will not be able to request analysis of the counter sample.

FSIS concluded that the documentation submitted by SENASA demonstrated that every chemical residue sample with a violative test result that is taken in establishments certified to export to the United States during the production of product intended for export to the United States will be considered final and will not be eligible to be re-analyzed with the potential to negate the confirmed positive result.

The FSIS auditor reviewed records and interviewed personnel at the CCA headquarters to verify that SENASA implemented the corrective actions in response to the FSIS audit finding. The FSIS auditor confirmed distribution and receipt of the revised procedures by reviewing records in the GDE. In the event a residue sample is violative, SENASA headquarters is immediately informed and a dossier is initiated to ensure implementation of a follow-up investigation and action. Further, in the event the farmer who supplied the livestock requests analysis of the counter sample, authorization must be provided by the SENASA national residue laboratory to conduct analysis of the counter sample. Therefore, SENASA has direct control over approval of any analysis of counter samples. The revised documents make clear throughout the system that analysis of counter samples is not allowed for any products intended for export to the United States.

The FSIS auditor visited a private chemical residue laboratory that is SENASA-approved network laboratory and responsible for performing analyses of samples from establishments certified to export to the United States. The FSIS auditor reviewed records, sample receiving, and interviewed laboratory and SENASA personnel. The FSIS auditor confirmed that laboratory personnel are aware of, and adhere to, the requirement that results obtained from analysis of the primary sample are final. Further, the FSIS auditor observed sample receipt and verified the submission form and sample seals that designate samples as the primary sample.

The audit confirmed that SENASA has implemented the corrective actions provided in response to the previous audit finding to ensure that analytical results from the primary sample analysis are final and no counter sample analysis is allowed for any samples with confirmed violative results from slaughter production intended for export to the United States. Argentina's meat inspection system has regulatory requirements for a chemical residue testing program that is organized and administered by the national government.

## **IX. COMPONENT SIX: GOVERNMENT MICROBIOLOGICAL TESTING PROGRAMS**

This component was not assessed during the current targeted follow-up audit because no systemic audit findings were identified during the previous audit.

## **X. CONCLUSIONS AND NEXT STEPS**

An exit meeting was held with SENASA on December 6, 2019, in Buenos Aires, Argentina. At this meeting, the FSIS auditor presented the observations from the follow-up audit.

The FSIS auditor concluded that Argentina's meat inspection system is organized to provide ultimate control, supervision, and enforcement of regulatory requirements. The CCA has implemented measures to ensure the use of government employees for all post-mortem inspection of livestock intended for export to the United States. In addition, the CCA has implemented measures to ensure system-wide controls prohibiting the analysis of counter-samples following a violative chemical residue testing result.

# APPENDICES

## **Appendix A: Individual Foreign Establishment Audit Checklists**

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Sociedad Anonima Importadora y Exportadora de la Patagonia Salto Buenos Aires	2. AUDIT DATE 12/03/2019	3. ESTABLISHMENT NO. 189	4. NAME OF COUNTRY Argentina
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	Raw intact beef (cuts)

60. Observation of the Establishment

55. The audit verification activities were limited to verification of post-mortem inspection by official government employees. No findings were identified.

61. AUDIT STAFF

OIEA International Audit Branch (IAB)

62. DATE OF ESTABLISHMENT AUDIT

12/03/2019

United States Department of Agriculture  
Food Safety and Inspection Service

## Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION FCO. Rioplatense S.A.I.C.I.F. General Pacheco Buenos Aires	2. AUDIT DATE 12/04/2019	3. ESTABLISHMENT NO. 1920	4. NAME OF COUNTRY Argentina
	5. AUDIT STAFF OIEA International Audit Branch (IAB)		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

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

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

Establishment Operations:	Beef slaughter and processing.
Prepared Products:	Raw intact beef (cuts, primals and subprimals)
	RTE fully-cooked beef (not sliced)

60. Observation of the Establishment

55. The audit verification activities were limited to verification of post-mortem inspection by official government employees. No findings were identified.

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



República Argentina - Poder Ejecutivo Nacional  
2020 - Año del General Manuel Belgrano

### Nota

**Número:**

**Referencia:** ESTADOS UNIDOS - Auditoria por carne bovina / Informe Borrador

En respuesta a: ME-2020-16501487-APN-DNIYCA#SENASA

**A:** Melinda M. Meador (EMBAJADA DE LOS ESTADOS UNIDOS),

**Con Copia A:** Maria Florencia Venticinque (PRES#SENASA), Hernan Galarza (PRES#SENASA), María Paula Kupferberg (PRES#SENASA), Jose Domingo Molina (DNMAI#MPYT), Gabriela Celeste Alvarez (DREAN#MRE), Gustavo Oscar Infante (DNREB#MRE), Jose Antonio Viceconte (DREE#MRE), Melisa Galvano Quiroga (DNMAI#MPYT), Santiago Bonifacio (DNMAI#MPYT), Silvina Ines Rivero (DNAI#MPYT), Juan Maximiliano Moreno (DNMAI#MPYT),

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### De mi mayor consideración:

Tengo el agrado de dirigirme a usted en respuesta a la Nota del Servicio de Seguridad e Inspección Alimentaria (FSIS) del Departamento de Agricultura de los Estados Unidos (USDA), del 12 de febrero, mediante la cual se remite el Informe Borrador de la auditoria llevada a cabo durante el mes de diciembre de 2019.

Al respecto, este Servicio Nacional agradece las conclusiones plasmadas en dicho informe e comunica que, habiendo evaluado el mismo no presenta comentario, y queda al aguardo del documento final.

Sin otro particular saluda atte.



Argentina Republic - National Executive  
2020 - Year of the General Manuel  
Belgrano

**Note**

**Number:** NO-2020-16651643-APN-PRES # SENASA

BUENOS AIRES CITY  
Friday 13 March 2020

**Reference:** UNITED STATES - Audit for beef / Draft Report Replying to:

ME-2020-16501487-APN-DNIYCA # SENASA

**TO:** Melinda M. Meador (EMBASSY UNITED STATES),

**With copy to:** Maria Florencia Venticinque (PRES # SENASA), Hernan Galarza (PRES # SENASA), Maria Paula Kupferberg (PRES # SENASA), Jose Domingo Molina (DNMAI # MPYT), Gabriela Celeste Alvarez (DREAN # MREs), Gustavo Oscar Infante (DNREB # MRE), Jose Antonio Viceconte (DREE # MREs), Melisa Galvano Quiroga (DNMAI # MPYT), Santiago Bonifacio (DNMAI # MPYT), Silvina Ines Rivero (INAD # MPYT), Juan Maximiliano Moreno (DNMAI # MPYT)

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Esteemed colleagues:

I am pleased to write to you in response to the Note from the Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA), dated February 12, that provided the draft report of the audit that took place during the month of December 2019.

In this regard, SENASA thanks you for the conclusions reflected in the report and responds that, having evaluated the same, has no further comment and awaits the final report.

Without further ado greets atte.

Digitally signed by ELECTRONIC DOCUMENT MANAGEMENT - GDE  
Date: 2020.03.13 9:34:09 -03:00

Miguel Donatelli  
Technical  
Professional  
Presidency  
National Health and Agrifood Quality