



EUROPEAN COMMISSION  
HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL

## ASSESSMENT OF THE REPORT MADE BY THE IRISH FARMERS' ASSOCIATION OF THEIR VISIT TO BRAZIL IN MAY 2007

### Summary

The Irish Farmers Association (IFA) report describes a visit to Brazil which covered numerous farms in a short period of time. The farms visited were located in two States, Paraná and Mato Grosso do Sul, which are currently banned from exporting beef to the EU, and in a third State (Mato Grosso) only part of which is authorised for export. It is unclear from the report how many farms authorised for export were visited by the IFA, if any.

In addition, the IFA report does not describe any visit to slaughterhouses, laboratories, official veterinary offices or certifying bodies. For this reason, the IFA mission team was unable to assess the full system of controls and safeguards applied in Brazil for the export of beef to the EU. In particular, as their report does not mention many aspects of the EU requirements (for example maturation, de-boning, and 90 and 40 days residence prior to slaughter), or of the Brazilian system for beef production (for example cattle passports, movement documents, and slaughterhouse controls), it appears that these fundamentally important aspects of the regime in place were not assessed.

When the Commission's Food and Veterinary Office (FVO) carries out an inspection in Brazil (and 7 inspections on Brazilian beef production systems have taken place in the last two and half years), a representative sample of farms, slaughterhouses, laboratories, official veterinary offices and certifying bodies are inspected by trained inspectors.

The IFA report states that:

- Brazilian cattle are not identified or registered in the same way as European cattle and full traceability of all cattle in Brazil cannot be achieved.
- There is foot and mouth disease (FMD) present in Brazil.
- There is movement of cattle between FMD-infected and non-infected States of Brazil.
- Brazilian controls on veterinary medicines are not the same as European controls.

This information is not new and is misleading, as the EU cannot impose the full range of its internal legislative measures on third countries. The EU can and does require measures that ensure the protection of animal and public health in the EU, in accordance to the principles and rules of the World Trade Organisation Agreement on the Application of Sanitary and Phytosanitary measures (SPS agreement).

Indeed, the EU animal health import conditions for bovine meat do not require that:

- all Brazilian cattle should be fully traceable;
- FMD must be absent from the whole territory of Brazil;
- movements of cattle from States/zones that are not FMD-free into FMD-free States/zones should be banned.

However, in accordance with a "double fencing" approach, the EU does require that:

- any cattle from which meat is destined to the EU market has to be resident in an EU recognised FMD-free State/zone for 90 days and on an authorised farm for 40 days immediately prior to slaughter; this period of traceability ensures that animals which may pose any FMD risk are not slaughtered for export;
- the slaughter of animals whose meat is destined to the EU must be carried out in slaughterhouses approved by the EU and located in FMD-free States/zones where the above traceability requirements are checked;
- only matured and de-boned meat is allowed for export as this treatment would ensure the destruction of any FMD virus should it still be present in the beef, if for any reasons the above requirements are not fulfilled and an FMD infected animal is slaughtered.

With regard to the issue of **residues and veterinary medicines controls** in Brazil, the Brazilian residues control plan has been deemed to offer guarantees equivalent to those provided for by Community legislation. In common with the EU Member States, the Brazilian authorities exercise controls on the authorisation and wholesale/retail sale of veterinary medicines. It is true that many veterinary medicines are available in Brazil without a veterinary prescription, which is different from the situation in the EU Member States. However, for cattle, meat from which is eligible to be exported to the EU, there is now a requirement under the Brazilian cattle tracing system (SISBOV) mandating the maintenance of medicines records on those eligible farms. The FVO has inspected Brazil for compliance with veterinary residue requirements in Spring 2007. The FVO did not find any evidence of use of growth promoting hormones, and was broadly satisfied with the controls of the Brazilian authorities. Consequently, many of the conclusions on residues and veterinary medicine issues in the IFA report are not valid.

The attached table (Annex I) provides a point-by-point reply to the sections of the IFA report dealing with "tagging, traceability and movement controls", "movement and border controls and biosecurity", "animal medicines and illegal growth hormones", and "inadequate foot and mouth disease controls". These comments are based on facts recorded by successive FVO missions to Brazil over many years. No comments have been made on the sections of their report dealing with environmental and social issues.

Further details on the EU requirements which apply to Brazilian beef and the actions undertaken by the Commission after recent FVO missions in Brazil are given in Annex II.

## Annex I – FVO Comments on the Irish Farmers’ Association report on their mission to Brazil.

### Section 5.1 TAGGING, TRACEABILITY AND MOVEMENT CONTROLS

IFA Finding	FVO Comment
GENERAL COMMENTS	<p>The IFA report does not describe any visit to a slaughterhouse, laboratory, official veterinary office or certifying body. However, these all play crucial roles in the production and certification of meat for export to the EU.</p> <p>The IFA does not provide any information concerning the EU eligibility of the farms visited. This is an important criterion, as the EU requirements are not applicable in non EU eligible farms.</p> <p>It would have been helpful if the IFA had provided a more detailed programme of their visits.</p> <p>The IFA refers to 331.436 tonnes of beef imported from Brazil. This quantity of meat represents around 2.500.000 live animals to be slaughtered. The cattle population in Brazil is around 200.000.000 animals of which 16.500.000 are registered in SISBOV. This means that the vast majority of cattle in Brazil are not EU eligible and are, therefore, not subject to EU export requirements.</p> <p>The IFA's statement that the three States of Mato Grosso do Sul, Paraná and Sao Paulo produced 60% of the Brazilian beef for export to the EU before they were banned is not correct. This figure is biased by the fact that those three States had a very large slaughtering capacity, but they depended on other States for the supply of live animals for slaughter. In addition, exports of beef from Brazil frequently went through Sao Paulo for fiscal reasons. These are just some examples to explain that the figures provided on the provenance of the beef do not accurately reflect the situation of the Brazilian beef exports to the EU.</p> <p>Movement of cattle between States in Brazil is only allowed with movement permits (GUIA) issued by the local veterinary unit of origin. The GUIA contains information on the latest FMD vaccination of the animals. A copy of the GUIA is forwarded by the local veterinary unit of origin to the local veterinary unit of destination. In addition cattle from non EU approved areas can be moved to EU approved areas and after a period of residence of at least 90 days be slaughtered for the EU market if the remaining requirements of EU legislation are fulfilled (Council Decision 79/542/EEC as specifically amended as regards Brazil by Commission Decision 2005/753/EC requires that imports of</p>

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	<p>bovine meat from restricted States in Brazil are suspended).</p> <p>The IFA appears to have evaluated Brazilian tagging, traceability and movement controls against compliance with EU internal rules, which are not directly applicable in third countries.</p>
<p><b>Tagging, traceability and movement controls</b></p> <p>1. Following the mission to Brazil in 2006, the IFA reported that the vast majority of farms visited had no system of tagging or traceability. Branding or ear notching was the main form of identification.</p> <p>One year on, nothing has changed.</p>	<p>Information is missing on the type of farms visited.</p> <p>Individual cattle identification and registration in SISBOV (tagging and traceability) is only compulsory in Brazil for animals intended to be slaughtered for the export of beef to certain markets, including the EU. A number of conditions must be fulfilled before the animals can be considered as EU eligible before sending to slaughter.</p> <p>It is, therefore, not unexpected that in the vast majority of farms in Brazil no tagging or traceability is in place, and that in those farms branding is the identification system in place. However farmers using brands to identify cattle must register the brand used at the local veterinary units (LVU) and municipalities.</p>
<p>2. Of the 15 farms subject to in-depth observations, none of them had a full traceability system in place.</p> <p>11 of the farms had no tags in any of the livestock on the farms.</p>	<p>Beef produced from the vast majority of Brazilian cattle is intended to be consumed inside Brazil or exported to countries where individual identification and traceability is not a requirement.</p>
<p>3. On 7 farms, there was clear evidence of official SISBOV tags having been removed or cut out.</p> <p>On these farms, cut out or removed</p>	<p>Animals from which tags have been removed, and are thus without individual identification and registration in the SISBOV system, are not allowed to be slaughtered for export of their meat to the EU. The finding of removed ear tags does not, therefore, prove anything in relation to the fulfilment of EU requirements in Brazil</p>

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<p>SISBOV tags were littered around the cattle handling facilities. On a number of farms the IFA observed boxes and bags of tags, many of them SISBOV tags which were cut out or removed from animals.</p> <p>On almost all of the trading farms visited, particularly in the States of Parana and Mato Grosso, the IFA found boxes and bags of cut out and removed tags, including official SISBOV tags.</p> <p>In addition, the IFA observed many cattle on farms with holes in their ears and split ears as a result of tag removal.</p> <p>From discussions with a number of farmers, it is clear that the practice of tag removal is driven by the “regionalisation export ban” on beef from the States of Parana and Mato Grosso Do Sul.</p>	<p>If the IFA could provide information on the individual tag numbers and corresponding farms they have visited, this can be clarified with the Brazilian authorities.</p> <p>In addition it is important to bear in mind that SISBOV tags comply with the same requirements as EU legislation in relation to being tamper proof and non re-usable. Checks are carried out at slaughterhouses on arrival and during slaughter (identification controls on cattle and checks in the bovine database) to ensure that meat from animals not complying with EU requirements is not certified for the EU market.</p> <p>The last conclusion is invalid, as animal movements from non-authorised to authorised states are allowed under specific conditions (see above). There is, therefore, no economic incentive to remove tags for this reason.</p>
<p>4. A number of observers alleged the movement of both young cattle and beef cattle from Parana, a state currently banned from export to the EU, into the state of Rio Grande Do Sul, a state eligible for export.</p> <p>Farmers in Parana alleged that processors in Rio Grande Do Sul, who have EU</p>	<p>Movements between states are allowed, including for animals which will eventually be finished in an approved state to be slaughtered for export of their meat to the EU. However, certain conditions have to be fulfilled (see above and Annex II, point 4).</p> <p>The movement of cattle from Parana to Rio Grande do Sul is allowed under certain animal health conditions, including pre-movement testing for FMD. In addition, animals should remain in Rio Grande Do Sul and be individually identified and registered in the SISBOV database for</p>

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<p>export licences, were renting facilities in Parana to facilitate the supply of beef to their export customers as supplies were becoming very tight in Rio Grande Do Sul.</p>	<p>90 days, and for 40 days on the holding, before they are considered EU eligible and their meat can be certified to the EU market (as prescribed in Council Decision 79/542/EEC).</p> <p>There is no reason why processors with approved facilities in Rio Grande do Sul should not arrange supplies of cattle from Parana, as long as those cattle meet the EU requirements. The IFA report does not present any evidence that they do not meet the conditions.</p>
<p>5. The practice of tag removal and movement of cattle between the state of Mato Grosso Do Sul (banned from EU) and Mato Grosso (open to EU) was also alleged.</p>	<p>See remarks above.</p>
<p>6. Based on animals observed and discussions with farm owners and managers, in Brazil traceability or tracking is seen as a practice of simply tagging cattle a few days or weeks before slaughter. This practice allows farmers to sell cattle as tracked and claim a price premium equivalent to €10 - €15 per animal.</p>	<p>Animals eligible for the export of their meat to the EU market must be registered in the SISBOV database at least for 90 days prior to slaughter, otherwise they will be declassified on arrival at the slaughterhouse. That means that these cattle must be individually identified (with tamper-proof tags) more than 90 days prior to slaughter (see Annex II point 4). Several FVO missions found compliance with this requirement at slaughterhouses. The IFA did not visit slaughterhouses.</p>
<p>7. In all of the farm visits and discussions, no farmer made any reference to a farm register of the animals on the farm, to any system of effective movement controls or to any form of</p>	<p>A farm register is compulsory only for holdings with animals identified and registered in the database system SISBOV. They represent a small minority of the cattle holdings in Brazil.</p> <p>The Certificadoras (approved bodies) are responsible for the supervision of the tasks performed by farmers in relation with the SISBOV system, which includes individual identification,</p>

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<p>inspection or control of tagging or traceability by any authority.</p>	<p>respecting the deadlines of 40 and 90 days and movement of animals. In addition, audits are carried out by the Brazilian competent authorities in order to check compliance of farmers and Certificadoras with the legislation in force. Sanctions are applied in case of non-conformities detected during audits.</p> <p>Previous FVO missions found evidence that this system has improved over recent years.</p> <p>The statement of the IFA is that no farmer interviewed referred to these matters. However, the report does not claim that farmers denied the existence of registers and controls on SISBOV farms, or even whether these matters were raised with them.</p> <p>See comments on point 6 (above).</p>
<p>8. Based on the farms visited and discussions held, it is clear the Brazilian livestock sector has not bought into the concept or importance of cattle tagging, traceability or movement controls.</p>	
<p><b>Conclusions</b></p> <p>9. There is no proper system of tagging or identification of cattle in Brazil</p> <p>Traceability is either non-existent or meaningless.</p> <p>Where tagging was observed, there is widespread illegal removal and cutting out of official SISBOV tags.</p> <p>The tagging and traceability situation has not improved at all in the last year. Due to the widespread practice of tag removal</p>	<p>There has been a system of tagging or identification of cattle in Brazil (SISBOV) since 2002. This system is only compulsory in animals intended to be slaughtered for the export of meat to countries requiring traceability.</p> <p>The vast majority of cattle and bovine holdings are not registered in SISBOV as they are intended to be slaughtered for the internal market or to countries where individual tagging and traceability is not required. However these cattle holdings are registered at the Local veterinary units (LVU) and animals are marked by a system of registered brands.</p> <p>For the movement of animals from both types of holdings (registered and not registered in SISBOV) the issuing of a movement document (GUIA) by the LVU is compulsory. In addition,</p>

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<p>and cutting out, the situation has deteriorated.</p> <p>Widespread illegal movement of cattle was discussed and alleged by many observers.</p> <p>The Brazilian livestock sector has not bought into the concept or importance of cattle tagging, traceability or movement controls and farmers do not take the monitoring of the system seriously.</p> <p>The EU policy of regionalisation as applied in Brazil cannot work in the absence of an effective tagging, traceability and movement control system.</p> <p>The failure of Brazil to apply and operate an effective system completely undermines the credibility of the EU regionalisation policy and certification process for beef exports to Europe.</p> <p>The failure of Brazil on tagging, traceability and movement controls demonstrate that the EU’s claim that standards in Brazil are equivalent to those applied in the EU, does not stand up to scrutiny.</p> <p>The facts based on the evidence at farm</p>	<p>SISBOV registered cattle are accompanied by a passport (DIA), confirming their date of registration in the database.</p> <p>Controls on the movement of animals are carried out throughout the country in fixed control posts between States and mobile control post. Sanctions are applied in case of illegal movement of animals.</p> <p>Animals are eligible for slaughter for the EU market after a minimum residence period in the EU approved area of at least 90 days and residence of 40 days in the last holding. This is officially controlled before slaughter by checking the data of the cattle concerned in the SISBOV database and the date of issuing of the DIA. Non compliant animals, such as those from which tags have been removed, are declassified and their meat cannot be certified for the EU market.</p> <p>In addition, at slaughterhouses EU eligible animals are officially checked during the ante-mortem and post mortem inspection for FMD signs and lesions and their meat must undergo a maturation process, which is also officially controlled.</p> <p>The system operated in Brazil in holdings registered in SISBOV (the only ones from where individually identified animals are potentially eligible for export to the EU market) allows the certification of beef to the EU.</p> <p>The FMD control policy applied in Brazil has prevented disease spread into the States/zones that are currently authorised for export to the EU.</p> <p>Shortcomings have been detected during the FVO missions in Brazil. Recommendations have been made to the Competent Authorities, action plans to correct deficiencies proposed, follow-up on implementation carried out and Decisions taken whenever considered to be necessary to</p>

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<p>level are that standards in Brazil are not equivalent to those applied in the EU, and the EU Commission cannot assure imports based on existing deficiencies.</p>	<p>protect the EU.</p> <p>It should also be emphasised that the EU requirements are not based on any concept of equivalence of Brazilian national systems of animal identification, registration or traceability with those in force in the EU. On the contrary, it is because the Brazilian national systems are not equivalent that the EU requires Brazil to meet, in a controlled part of the Brazilian production system, specific additional conditions in respect of animals whose meat is destined for the EU market.</p>

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IFA Finding	FVO Comment
<p><b>Movement and border controls, and bio-security</b></p> <p>1. Without a proper system of tagging and traceability, it is impossible to control or monitor the movement of animals in Brazil.</p> <p>2. The movement control on animals between states in Brazil is proving impossible. The totally inadequate cattle tagging and traceability system is simply not capable of monitoring movement controls.</p> <p>The IFA observed massive movement of cattle on a daily basis in Brazil across state boundaries with convoys of trucks constantly on the roads. With no effective traceability, the origin or destination of these animals cannot be established.</p> <p>At state border checkpoints on the main routes, the controls were very limited and focused on taxation verification with no livestock traceability or movement controls.</p> <p>Many farmers farm on both sides of the State border. In addition, the network of</p>	<p>This is true in respect of the movement of animals generally. However, a special regime is in place for animals intended for slaughter for EU export. As noted above, the system in place in Brazil for animals intended to be slaughtered for the export of their meat to the EU is based on individual identification and registration of the animals at SISBOV for at least 90 days before slaughtering in EU approved area and 40 days on the last holding. This allows for traceability through their registration in SISBOV, and for compliance with the requirements on certification to the EU.</p> <p>As mentioned earlier, the key issue for the EU policy is that the animals to be slaughtered for the EU market have to remain for 90 days in an EU approved area and for 40 days in an approved farm before slaughter, in addition to being registered in the SISBOV system. These requirements were systematically checked during FVO inspections in Brazil. Although the preliminary findings of a recent mission of the FVO indicate that there are some practical difficulties in the general implementation of the system of animal identification and the control of animal movements, they were generally found to be satisfactory.</p> <p>The statement of the IFA that the origin or destination of these animals cannot be established is incorrect. All cattle, whether or not individually identified, are accompanied by the compulsory GUIA.</p> <p>The IFA report does not mention the GUIA, leading one to question if they were aware of its existence.</p> <p>The IFA should be asked to provide information on the inter-state control points visited and what they have checked during their visits.</p> <p>There are also no border crossing controls within the EU, where reliance is placed on controls at origin and at destination.</p>

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IFA Finding	FVO Comment
<p>dirt tracks and unofficial roads are impossible to patrol, leaving any form of movement control impossible in practice. Bio-security at state border crossings, even from FMD restricted states (Parana and Mato Grosso Do Sul) to unrestricted states (Mato Grosso) is non-existent in Brazil.</p> <p>There was no bio-security controls crossing from Parana to Mato Grosso Do Sul, or from Mato Grosso Do Sul (restricted) into Mato Grosso (unrestricted).</p> <p>In 2006, there was some small level of bio-security at official state border crossings. However this year, all bio-security controls have been completely removed.</p>	<p>As noted in a previous FVO mission report, bio-security controls between States were lifted in Brazil as the last outbreak was notified in April 2006.</p>
<p>3. A high threat to the animal health status of the Brazilian livestock herd is the uncontrolled land border of over 3,000km with Paraguay and Bolivia, where FMD is reported to be a major problem and uncontrolled. With cattle prices significantly higher in Brazil compared to Paraguay, cattle smuggling between the two countries is</p>	<p>See first the comments as above in point 2; imported animals would still have to meet the residency requirements. No objective evidence is provided that FMD is a major problem or uncontrolled in the area at the border between, Bolivia, Paraguay and Brazil, even though FMD outbreaks have been recently reported in Santa Cruz in Bolivia.. Issues related to land borders between Brazil and these countries have been the subject of recommendations in previous FVO reports. In addition, even if smuggling takes place at the borders, the EU policy as currently designed is robust enough to cope with this situation and to maintain our appropriate level of protection.</p>

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<p>alleged to be widespread. This problem is further compounded by the fact that many Brazilian farmers own farms on both sides of the international border and move cattle from one country to the other. In addition, the vast majority of the border is a land border and no official border controls exist in practice. In crossing at the official border control point into Paraguay, there was no bio-security controls. Bio-security was non-existent.</p>	
<p><b>Conclusions</b> 4. Livestock movement controls in Brazil are impossible because of no effective tagging or traceability.</p>	<p>Livestock movement controls in Brazil are carried out as stated above, with cattle being identified and accompanied by the movement document (GUIA). FVO missions have noted tagging and traceability systems adequate to ensure respect of the EU requirements for 90 day and 40 day residence.</p>
<p>5. There is widespread movement of cattle between states (restricted and unrestricted states).</p>	<p>It is a normal procedure, and unobjectionable from the EU point of view, to move animals between states restricted (non-EU approved) and not restricted (EU approved States), under certain animal health conditions and with movement documents (GUIA) issued by the LVU as described before.</p>
<p>6. Bio-security between states (restricted and unrestricted states) was non-existent on our visit. Without movement controls and bio-security, the policy of regionalisation</p>	<p>See comments to points 2 and 3 (above).  In relation to international border controls, an agreement has been signed between Brazil, Paraguay, Bolivia and Argentina in order to cooperate and implement common measures to eradicate FMD. During previous FVO missions in South American countries, it has been noted</p>

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<p>cannot work in Brazil. Cattle smuggling between Brazil and Paraguay is alleged to be widespread. There were no bio-security controls observed between Brazil and Paraguay, a high risk FMD region. Without effective international border controls and bio-security from high-risk FMD countries like Paraguay and Bolivia, Brazil will remain a high risk FMD country and further outbreaks of FMD are inevitable.</p>	<p>that some actions have already been implemented.</p>

Section 5.3. ANIMAL MEDICINES AND ILLEGAL GROWTH HORMONES

IFA Finding

FVO Comment

**General comments: Legal basis of FVO residues missions in third countries.**

**1. Residues Plans**

Community legislation on residues in food of animal origin (Council Directive 96/23/EC) has the aim, *inter alia*, of detecting all illegal treatment of animals (with banned substances) and the misuse of authorised veterinary medicinal products. Veterinary medicinal product authorisation and controls thereof are covered by other Community legislation (Directives 90/167/EEC and 2001/82/EC).

Third countries may only be approved for exporting certain food commodities to the EU on submission of a residues monitoring plan to the Commission Services which is assessed satisfactorily. Essentially, plans which are approved are *de facto* deemed to offer guarantees equivalent to those provided for by Directive 96/23/EC. Countries so approved are listed. In respect of beef and several other commodities, the Brazilian residue control plan is approved and Brazil is listed in the above Decision. It should be noted that the Brazilian plan is much improved relative to that seen in either 2003 or 2005 and that for those commodities where the plan was not judged to offer equivalent guarantees, delisting was carried out by the Commission services (e.g. honey, farmed game etc).

**2. Veterinary medicines**

As one of the causes of residues in food producing animals, how veterinary medicines are authorised, distributed and used is also a major focus of residues missions. In the Member States, veterinary medicines fall under the framework of the Community Code on veterinary medicines (Directive 2001/82/EC) which lays down the conditions covering their manufacture, authorisation, distribution and recording of their use. For those veterinary medicines classified as ‘medicated premixes’ which are used to produce medicated feedingsuffs, they are covered by the medicated feedingsuffs Directive 90/167/EEC.

There are differences between the system for veterinary medicine distribution and control in Brazil and in the EU.

**(a) Medicines records:**

In the 2003 and 2005 residues missions it was found that there was no legal requirement in Brazil for farmers to keep records of the administration of veterinary medicinal products to food producing animals. In the EU of course the maintenance of medicines records is mandatory under Council Directive 96/23/EC. However, the veterinary medicines code) does not oblige farmers in the Member States to keep records of treated animals – Member States may (or may not) require it – farmers are merely required to provide and keep *inter alia* ‘proof of purchase’ of veterinary medicines. The 2007 residues mission found that, for cattle at least, there is now a requirement under the

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IFA Finding	FVO Comment
	<p>new animal identification system (SISBOV) for the maintenance of medicines records and this was functional on the SISBOV farms visited.</p> <p><b>(b) Prescription-only medicines</b></p> <p>The number of veterinary medicinal products which require a veterinary prescription in Brazil is much less than in the EU. Consequently the majority of medicines are available over-the-counter. This is one of the reasons why the Commission insisted that the scope of residues testing was increased to take greater account of those (over-the-counter) veterinary medicines which are commonly used in livestock production in Brazil – particularly organophosphates, carbamates and pyrethroids which are widely used for tick control. For the 2007 residues plan, these substances are included.</p> <p><b>(c) Control activities by the competent authorities</b></p> <p>The Community code on veterinary medicines does not specify the frequency or the precise nature of control activities in respect of veterinary medicines which are to be performed by competent authorities on farms. It merely makes reference to the fact that records should be available for inspection by the competent authorities at the different levels of the distribution chain (wholesalers, retailers, farms etc) and it specifies the minimum information which should be recorded. With regard to the controls or checks of veterinary medicine usage on-farm and at other points in the distribution chain (e.g. wholesalers, retailers), the Brazilian authorities did institute an inspection system of wholesalers and retailers after the 2003 residues mission. There are however currently no regular controls at the level of the farmer. However, with the introduction of changes to the SISBOV system, controls on those farms carried out by the third party certification bodies includes controls on the use of veterinary medicines.</p>
<p><b>Specific comments on the IFA report</b></p> <p>1. On one of the farms, the Mission team found growth hormones which are illegal in the European Union. A bottle of ‘Synovex S’ which contains two pure steroid hormones, progesterone and estradiol benzolite together with a pump action syringe gun were found on the</p>	<p>Hormonal Growth Promoters are not authorised for use in livestock in Brazil – irrespective of the destination of the beef derived from these animals. This is in accordance with Article 11 of Council Directive 96/22/EC.</p> <p>Synovex S is a trademark of Wyeth which owns the Fort Dodge trademark seen on the label of this bottle. Wyeth does not market Synovex in this form. It is formulated as an implant (pellet).</p>

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IFA Finding	FVO Comment
<p>cattle handling facilities on this farm. The label on the Synovex S growth hormone bottle states “this formulation provides a complementary amount of each hormone for maximum growth stimulation”. There was no expiry date or lot number marked on the bottle. It was clear from the location of the find, that this product was being used on the animals on the holding.</p>	<p>This product would therefore appear to be a black market preparation – an assumption supported by the absence of a lot number and expiry date. On the assumption that this preparation actually included estradiol, at most this finding suggests that there could have been illegal use on this farm.</p> <p>Successive FVO inspection missions have not, however, found any evidence that there is use of illegal hormones on SISBOV farms. These inspections have included unannounced farm visits. Furthermore, in common with the EU Member States, Brazil tests cattle for residues of hormones (see below). The results of this testing are comparable to those reported by the EU Member States</p>
<p>2. Controls on the use of antibiotics are non-existent in Brazil.</p>	<p>This is not correct. The issue of controls on veterinary medicine use has been covered in both the 2003 and 2005 FVO mission reports on residues.</p> <p>With regard to the controls or checks of veterinary medicine usage <i>on-farm</i> and at other points in the distribution chain (e.g. wholesalers, retailers), the Brazilian authorities did institute an inspection system of wholesalers and retailers after the 2003 residues mission where it was found that there were no controls at any stage. There was evidence both in the 2005 and 2007 missions that control activities were being carried out by the authorities at wholesale and retail levels.</p> <p>It is true however that there are no regular controls by the competent authority <i>at the level of the farmer</i>, and this is still the case in 2007. However, on the SISBOV farms which are solely permitted to supply beef to the EU market, third party certification bodies are required to check the medicines records which are obliged to be kept on these farms. So there is a level of control on these farms, albeit not carried out by the competent authority.</p> <p>With the introduction of the changes to the SISBOV system, records on veterinary treatment</p>

Annex I – FVO Comments on the Irish Farmers’ Association report on their mission to Brazil.

Section 5.3. ANIMAL MEDICINES AND ILLEGAL GROWTH HORMONES

IFA Finding	FVO Comment
<p>3. A wide range of antibiotics are available for sale in supply stores in all large rural towns without control.</p>	<p>have to be kept by the keepers at approved holdings and checks on the use of medicines are to be made by the third party certification bodies responsible for administering SISBOV. These bodies themselves are subject to audit by the Competent Authorities.</p> <p>Furthermore to put this in context, in the EU, the Community code on veterinary medicines does not specify the frequency or the precise nature of control activities in respect of veterinary medicines which are to be performed by competent authorities <i>on farms</i>.</p>
<p>4. The sale and use of insecticides without control is widespread.</p> <p>Insecticides are either applied by spray or can be fed with salt or minerals. When fed with salt, which is a widespread practice, they were being offered right up to point of slaughter.</p>	<p>It is correct to say that a wide range of antibiotics are available for sale in supply stores. It is incorrect to say that there is no control because, in previous FVO missions it has been seen that there <i>are</i> controls carried out by the competent authority at the level of these retail outlets.</p> <p>A key difference in the availability of veterinary medicinal products in Brazil compared to the EU Member States is that fact that the number of veterinary medicinal products which require a veterinary prescription in Brazil is much less than in the EU and consequently the majority of medicines are available over-the-counter. This is one of the reasons why the Commission insisted that the scope of residues testing was increased to take greater account of those medicines which are used in livestock production in Brazil.</p>
<p>Again, it is incorrect to say that the sale of insecticides is uncontrolled for the reasons stated above. However it is fair to say that the use (on-farm) is uncontrolled as farms are not subject to official controls on the use of veterinary medicines.</p> <p>The use of insecticides ‘up to point of slaughter’ may be acceptable if the residue depletion profile of the drug indicates that this practice will not result in residues exceeding the Maximum Residue Limit of the drug. If so, treatment up to slaughter would be in accordance with the label indications.</p>	<p>Again, it is incorrect to say that the sale of insecticides is uncontrolled for the reasons stated above. However it is fair to say that the use (on-farm) is uncontrolled as farms are not subject to official controls on the use of veterinary medicines.</p> <p>The use of insecticides ‘up to point of slaughter’ may be acceptable if the residue depletion profile of the drug indicates that this practice will not result in residues exceeding the Maximum Residue Limit of the drug. If so, treatment up to slaughter would be in accordance with the label indications.</p>

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**Section 5.3. ANIMAL MEDICINES AND ILLEGAL GROWTH HORMONES**

IFA Finding	FVO Comment
	<p>A lack of testing for residues of topically applied ectoparasiticides (e.g. carbamates, pyrethroids and organophosphate pesticides) was highlighted in the FVO inspections of 2003 and 2005. The Commission has raised this specific point with the Brazilian authorities and insisted that this testing is carried out. In the 2007 mission, it could be seen that testing for these residues is in the process of being implemented.</p>
<p>5. There was no system of recording the use of any drugs or monitoring withdrawal dates on any farm.</p>	<p>This is not correct. It is true that in the 2003 and 2005 missions it was found that there was no legal requirement in Brazil for farmers to keep records of the administration of veterinary medicinal products to food producing animals. The 2007 residues mission found that, for cattle at least, there is now a requirement under the animal identification system (SISBOV) for the maintenance of medicines records and this was functional on the farms visited.</p>
<p>6. FMD vaccine dumping is alleged to be widespread in Brazil. This involves the practice of obtaining a certificate for vaccination usage when purchasing the vaccine but dumping the product and not administering it to the livestock.</p>	<p>The IFA statement is not correct. There is a targeted programme of supervised vaccination in which Officers of the Local Veterinary Units are carrying out inspections in farms during the vaccination period. In addition there is a programme to monitor the efficacy of the vaccination by which blood samples are collected yearly at random in selected farms and FMD antibody titres are checked.</p>
<p>7. Conclusion: Growth promoting hormones which are illegal in the EU are being used in livestock production in Brazil.</p>	<p>There was evidence of possible illegal use on the single farm on which this apparently black-market preparation was found. The conclusion gives the impression of widespread abuse which can not be substantiated either by the IFA finding, the results of residues testing in Brazil for residues of hormones in cattle or the outcomes of the last three FVO residues missions.</p>
<p>8. Conclusion: There are no controls on the purchase or use of antibiotics and insecticides in livestock production in Brazil.</p>	<p>It is accepted that there are no competent authority controls on the use of veterinary medicines on farms and this has been pointed out in successive FVO residues mission reports. However, there are controls on wholesale distribution and retail sale.</p>

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**Section 5.3. ANIMAL MEDICINES AND ILLEGAL GROWTH HORMONES**

<b>IFA Finding</b>	<b>FVO Comment</b>
<p>9. Conclusion: There is no system of recording drug use or observing withdrawal dates in livestock production in Brazil.</p>	<p>This very sweeping conclusion is misleading since on those farms which are only authorised to supply beef to the EU market, there is a requirement for keeping medicines records. It is not clear if the IFA delegation visited non-SISBOV farms. If so, their observations would be correct but irrelevant for the export of beef to the EU.</p>
<p>10. Conclusion: FMD vaccine dumping is practiced and alleged to be widespread in Brazil.</p>	<p>See above on findings.</p>

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**Section 5.4 INADEQUATE FOOT & MOUTH DISEASE CONTROLS**

IFA Finding	FVO Comment
<p>General comments:</p> <p>This section of the report does not describe findings and conclusions made by the IFA during their visit to Brazil. It contains the personal opinions of Prof. Augusto Pinto. Furthermore, it addresses the overall problem of FMD in Brazil. Brazil has endemic FMD in some parts of the country, and this has been the case for many years. This situation is well known to the EU, and EU rules for import of beef accordingly contain measures to protect the EU from this threat. We are only concerned with the controls exercised in Brazil over animals and their meat destined for export to us. The specific EU measures are not addressed in this section.</p> <p>For these reasons there is little to add. However, for the sake of completeness, we have included comments to this section to clarify the situation as regards Brazil.</p> <p>1. In 2006, the IFA met with Professor Augusto Pinto who raised serious concerns regarding the diagnosis of FMD infected animals and the inadequacies of the controls methods adopted by the Brazilian authorities. IFA scheduled another meeting with Professor Pinto in May 2007 to establish if the FMD control situation had improved in Brazil. Professor Pinto has over 30 years experience in FMD controls, is a former advisor to the Brazilian Agricultural Minister and conducted part of his research work on FMD at Pirbright in the UK.</p>	<p>See general comments.</p>

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**Section 5.4 INADEQUATE FOOT & MOUTH DISEASE CONTROLS**

IFA Finding	FVO Comment
<p>Professor Pinto told the IFA that the inadequate controls on FMD and the failure of the Agricultural Ministry to provide sufficient funding to control the disease was increasing the risk of more outbreaks of FMD in Brazil.</p>	
<p>2. The Professor said he has real concerns about further outbreaks from control failures involving cattle movement across borders, vaccine dumping and disease cover ups.</p>	<p>Comment already made to point 5.2 of the IFA report.</p>
<p>3. He said there is a risk of an outbreak going undetected in Mato Grosso Do Sul and when detected being covered up.</p>	<p>Mato Grosso do Sul is not currently approved for export to the EU.</p>
<p>4. Professor Pinto condemned the practice of vaccine dumping which he said was widespread. This involves the purchase of the vaccine to get a certificate only and with no verification or proof that the vaccine was actually administered.</p>	<p>Vaccination carried out in Brazil by farmers is controlled by the LVU cross-checking the number of animals vaccinated against the number of doses of FMD vaccine purchased and the number of animals registered at the LVU databases.</p> <p>To verify that vaccine is administered correctly, a targeted programme of supervised vaccination in which officers of the LVU are present on farms during vaccination has been established. In addition some vaccination is done by officers of the LVU in risk areas/farms.</p>
<p>5. He said a vaccine programme without full tagging and traceability was not controlling FMD and was only</p>	<p>Brazil has a sero-surveillance programme in place to check for FMD virus circulation.</p>

**Annex I – FVO Comments on the Irish Farmers’ Association report on their mission to Brazil.**

**Section 5.4 INADEQUATE FOOT & MOUTH DISEASE CONTROLS**

IFA Finding	FVO Comment
<p>suppressing the problem. This ineffective method of vaccination was reducing the immunity of the national cattle herd to FMD.</p>	
<p>6. Professor Pinto said in his opinion the national cattle herd in Brazil will never be fully tagged and traceable. He said it would be impossible to implement a traceability system any further north than Mato Gross Do Sul.</p>	<p>Full tagging and traceability is not a requirement for export to the EU.</p> <p>States situated north of Mato Grosso do Sul and visited in previous missions (for example Mato Grosso, Goias, Minas Gerais, etc) have holdings with individually identified and traceable animals.</p>
<p>7. Professor Pinto said Brazil had learned no lessons on how to control FMD from the 2005 outbreaks.</p>	<p>Brazil has implemented a number of actions in response to recommendations on FMD control in FVO mission reports.</p>
<p>8. He said the Government adopt a ‘don’t want to know’ policy on FMD and the new Minister for Agriculture has no interest in FMD and ignored best scientific advice.</p>	<p>See previous comment.</p>
<p>9. Professor Pinto said Brazil will never get control of FMD until there is a change from the current policy and a new programme is implemented involving the following key points:</p>	<p>Comments already made to points 5.1 and 5.2 of the IFA report.</p> <p>Concerning the laboratory statements, according to information provided by the Brazilian authorities in a previous mission in 2006 a new FMD official laboratory was in the final phase of construction. Shortcomings detected in the laboratory testing system were not related to the</p>

**Annex I – FVO Comments on the Irish Farmers’ Association report on their mission to Brazil.**

**Section 5.4 INADEQUATE FOOT & MOUTH DISEASE CONTROLS**

<b>IFA Finding</b>	<b>FVO Comment</b>
<p>Building a new control laboratory similar to Pirbright in the UK to allow widespread serological testing as opposed to the current system of using inadequate test kits.</p> <p>Veterinary surgeons must be given the resources and responsibility to properly control vaccine administration at farm level in order to avoid vaccine dumping.</p> <p>The problem of inadequate border controls between Brazil, Paraguay and Bolivia and between states in Brazil must be resolved.</p> <p>The lack of bio-security and illegal cattle movements are major problems.</p> <p>Impossible to control FMD in Brazil until all animals are tagged and fully traceable and this has proved impossible.</p>	<p>use of “inadequate test kits”. It should be noted that national experts in FMD diagnosis from two renowned EU laboratories, Padova in Italy and Pirbright in UK, participated in two FVO missions to Brazil in 2006.</p>

## **Annex II**

### **Safeguards in EU legislation which apply to Brazilian beef and actions taken following recent FVO missions in Brazil**

1) At present, beef imports from third countries are only permitted if they satisfy a number of requirements, which are sometimes stricter than the OIE (World Organisation for Animal Health) standards, in order to ensure the EU an adequate level of protection against animal and public health risks. These requirements are science-based, proportionate and non-discriminatory, in accordance with the principles of the World Trade Organisation Agreement on the Application of Sanitary and Phytosanitary measures (SPS agreement).

2) In accordance with Community legislation, imports of products of animal origin are only permitted from Third Countries (TCs) or parts thereof that have been specifically authorised following the in-depth assessment of the performance of the Competent Authorities, and a favourable mission carried out by the Commission's Food and Veterinary Office (FVO). The approval is also dependent on the animal health situation within the TC in question, and the approval of its residue control plan.

In addition, the products of animal origin must comply with the requirements laid down in the appropriate public and animal health certificate. For bovine meat, the certificate lays down requirements at several levels including on the territory of origin, the holding of origin, the animals, the conditions at slaughter, and during meat production and storage. The territory of origin of the meat must be free from foot and mouth disease (FMD) and may have an official FMD vaccination programme in place (free of FMD with vaccination). The bovine animals, whose meat is destined to the EU market, must have remained within the territory for at least a 90 day residency period prior to slaughter. In addition, if imports are authorised from territories (such as those in Brazil authorised for export to the EU) where FMD vaccination is applied, there is also a 40 day residency period within the holding of origin prior to slaughter. This currently applies to territories within several TCs including for example Argentina, Botswana, Brazil, Namibia and Uruguay.

Furthermore, at the slaughterhouse the bovine animals cannot come into contact with other animals that do not comply with the above conditions, and the animals must undergo an ante-mortem health inspection and show no clinical signs of disease 24 hours prior to slaughter. The bovine meat must be obtained and prepared without coming into contact with other meats not complying with all the requirements mentioned above. To ensure that these requirements are complied with, individual cattle identification and traceability is compulsory for the 90 days prior to slaughter, for those animals whose meat is destined to the EU market. If the animals arrive at the slaughterhouse without the required ear tags and documentation, or are not registered in a database for at least 90 days, they are rejected and will not be slaughtered for export to the EU.

For those TCs which are free of FMD with vaccination, and in addition to the OIE requirements, EU eligible animals are officially checked at the slaughterhouses during the ante-mortem and post-mortem inspections and an additional more detailed inspection has to be carried out to detect FMD signs and lesions. In addition, their

meat must be de-boned after undergoing a maturation process to achieve the sufficient degree of acidity (monitored through the measurement of pH) which would inactivate the FMD virus, should it still be present despite all these measures.

Last but not least, imports of any other fresh beef products other than de-boned and matured meat are not permitted. Therefore imports of any other fresh beef products (offal) such as livers, kidneys, bladders, stomachs and intestines are not authorised. These requirements are stricter than the OIE standards, that do not foresee de-boning and maturation, when importing meat from FMD-free zones where vaccination is practised.

3) This policy has been assessed by the European Food Safety Authority (EFSA) and it has recognised that the measures in place are very effective to reduce the risk of introduction of FMD into the EU. EFSA's opinion was delivered in February 2006 and may be consulted at:

[http://www.efsa.europa.eu/en/science/ahaw/ahaw\\_opinions/1357.html](http://www.efsa.europa.eu/en/science/ahaw/ahaw_opinions/1357.html).

4) Based on these general requirements, a number of specific conditions have been set by EU legislation for imports of beef from Brazil. In Brazil, exports of bovine meat are only authorised from territories situated in those States that are considered to be free from FMD with vaccination. Following outbreaks of FMD in October 2005, the Brazilian States of Mato Grosso do Sul and Paraná and the bordering State of Sao Paulo, were removed from the list of Brazilian regions from which Member States are authorised to import bovine meat directly to the EU.

In Brazil, to ensure that the 90 days and 40 days residency periods are complied with the bovine animals whose meat is destined to the EU are identified with tamper-proof tags and registered through a system called SISBOV. The bovine animals must be kept for at least the 40 days residency period within a SISBOV registered holding. A longer 90 days standstill period is required for all animals kept within the holding, if animals from non approved territories are introduced within the SISBOV registered holding. Approved control bodies (Certificadoras) are responsible for the supervision of the tasks performed by farmers in relation to the SISBOV system. In addition, audits are carried out by the Brazilian competent authorities in order to check compliance of farmers and Certificadoras with the legislation in force. Sanctions are applied in cases of non-conformity detected during audits.

5) As regards the tag removal reported by the IFA, it is important to bear in mind that SISBOV tags comply with the same requirements as EU legislation in relation to being tamper proof and non re-usable. Checks are carried out at those slaughterhouses approved for the export of beef to the EU, on arrival and during slaughter (identification controls on cattle and checks in the bovine database) to ensure that meat from animals not complying with EU requirements is not certified for the EU market. Animals without individual identification and registration in the SISBOV system are not allowed to be slaughtered for export of their meat to the EU.

6) As regards the alleged smuggling of cattle from Bolivia and Paraguay, it should be clarified that while FMD outbreaks have been recently reported in Bolivia, there has been no outbreak in Paraguay for some years, and Paraguay is considered by the OIE to have a zone that is FMD-free with vaccination. However, even if smuggling takes

place at the borders, the EU policy as currently designed is robust enough to cope with this situation and to maintain our appropriate level of protection.

7) However, some of the shortcomings highlighted by the IFA have already been recognised in the most recent mission reports of the Commission's Food and Veterinary Office (FVO). The FVO currently has an intensive inspection programme in Brazil to determine whether the requirements of EU food safety and veterinary health legislation are complied with. FVO inspections are carried out in a professional, transparent, and impartial manner by Commission officials who are experts in the fields of animal and public health.

8) The most recent FVO mission to Brazil, in March 2007, aimed to evaluate the animal health controls in place, in particular over FMD and public health controls systems and certification procedures. Although it has not yet been finalised, the preliminary conclusions of the report do not justify an urgent change of EU policy vis-à-vis Brazil, as far as beef imports are concerned. However, some of the preliminary findings of the FVO indicate that there are some practical difficulties in the general implementation of the system of animal identification and the control of animal movements. The FVO report will be made available to the European Parliament and to the public in accordance with the standard procedures.

9) As regards hormones, hormonal growth promoters are not authorised for use in beef production in Brazil – irrespective of the destination of the beef derived from these animals. Recent FVO inspection missions have not found any evidence that there is use of illegal hormones on SISBOV holdings. These inspections have included unannounced visits of these holdings.

10) With regard to the issue of residues and veterinary medicines controls in Brazil, the Brazilian residues control plan has been assessed and approved as it offers guarantees equivalent to those provided for by Community legislation. In common with the EU Member States, the Brazilian authorities exercise controls on the authorisation and wholesale/retail sale of veterinary medicines. It is true that many veterinary medicines are available in Brazil without a veterinary prescription, which is different from the situation in EU Member States. However, there is now a requirement under the new SISBOV system mandating the maintenance of medicines records on those SISBOV holdings that produce bovine animals whose meat is destined to the EU market.

11) In light of certain shortcomings identified during recent missions, the Commission has requested that the Brazilian authorities provide auditable evidence of the rectification of the remaining deficiencies until the end of the year. Otherwise the Commission will reconsider the authorisation of beef exports. The FVO has scheduled further missions to Brazil, within the year, to ensure that these deficiencies are correctly addressed by the Brazilian authorities.