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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

BRAZIL

FROM 15 TO 26 APRIL 2013

IN ORDER TO EVALUATE THE IMPLEMENTATION OF HEALTH RULES ON ANIMAL BY-
PRODUCTS AND DERIVED PRODUCTS

Executive Summary

This report describes the outcome of an audit carried out by the Food and Veterinary Office in Brazil from 15 to 26 April 2013.

The overall objective of the audit was to assess whether the animal by-products (ABP) and derived products not intended for human consumption intended for export to the European Union (EU) satisfy guarantees at least equivalent to those set out by Regulation (EC) No 1069/2009 and Regulation (EU) No 142/2011. In terms of scope, the audit concentrated on official controls on the main ABP and derived products exported to the EU, notably pet food and related products.

Overall, the report concludes that there is a system for official controls along the chain of ABP covering also production of pet food which can ensure that export of ABP (deep-frozen chicken livers) for production of pet food largely complies with the conditions laid down in the health certificates for export to the EU. However, the system cannot provide the same level of guarantees with respect to processed pet food, since gaps in official controls result in Category 2 ABP being used for the production of pet food. Moreover, weaknesses in the certification procedures result in some key conditions being certified without availing of the proper information. Therefore, the guarantees provided in this respect are not equivalent to those set out by EU legislation concerning ABP and derived products.

The report makes a number of recommendations addressed to the Brazilian competent authorities, aimed at rectifying the shortcomings identified and further enhancing the implementing and control measures in place.

Table of Contents

1	<u>INTRODUCTION</u>	1
2	<u>OBJECTIVES</u>	1
3	<u>LEGAL BASIS</u>	1
4	<u>BACKGROUND</u>	2
4.1	<u>LEGAL FRAMEWORK FOR IMPORTS</u>	2
4.2	<u>INFORMATION ON THE SECTOR OF ABP AND DERIVED PRODUCTS</u>	2
5	<u>FINDINGS AND CONCLUSIONS</u>	3
5.1	<u>SYSTEM FOR OFFICIAL CONTROLS</u>	3
5.1.1	<u>LEGISLATION AND COMPETENT AUTHORITIES</u>	3
5.1.2	<u>ORGANISATION OF OFFICIAL CONTROLS</u>	6
5.1.3	<u>HEALTH CERTIFICATES</u>	7
5.2	<u>OFFICIAL CONTROLS ON REQUIREMENTS ALONG THE CHAIN</u>	10
5.2.1	<u>PLANTS' APPROVAL / REGISTRATION AND OFFICIAL CONTROLS</u>	10
5.2.2	<u>OFFICIAL CONTROLS ON PRODUCTION REQUIREMENTS</u>	11
6	<u>OVERALL CONCLUSIONS</u>	14
7	<u>CLOSING MEETING</u>	14
8	<u>RECOMMENDATIONS</u>	14
	<u>ANNEX 1 - LEGAL REFERENCES</u>	16

ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
ABP	Animal by-products
Category 1, 2 and 3 material	Different Categories of ABP as defined, respectively, in Articles 8, 9 and 10 of Regulation (EC) No 1069/2009
DFIP	Department of Livestock Input Inspection – <i>Departamento de Fiscalização de Insumos Pecuários</i>
DIPOA	Department of Inspection of Products of Animal Origin – <i>Departamento de Inspeção de Produtos de Origem Animal</i>
EU	European Union
FVO	Food and Veterinary Office
HACCP	Hazard analysis and critical control points
MAPA	Ministry of Agriculture, Livestock and Food Supply – <i>Ministério da Agricultura, Pecuária e Abastecimento</i>
SDA	Secretariat of Animal and Plant Health and Inspection – <i>Secretaria de Defesa Agropecuária</i>
SFA	Federal Agricultural Superintendence – <i>Superintendência Federal de Agricultura</i>
SFIP	State Service of Livestock Inputs Inspection – <i>Serviço de Fiscalização de Insumos Pecuários</i>
SIPOA	State Inspection of Service of Products of Animal Origin Inspection – <i>Serviço de Inspeção de Produtos de Origem Animal</i>
SRM	Specified risk material
UVAGRO	State Units of Agricultural Surveillance – <i>Unidade de Vigilância Agropecuária</i>
VIGIAGRO	General Coordination for International Agricultural and Livestock Surveillance – <i>Coordenação-Geral do Sistema de Vigilância Agropecuária</i>

1 INTRODUCTION

The audit took place in Brazil from 15 to 26 April 2013.

The audit team, which comprised two auditors from the Food and Veterinary Office (FVO) was accompanied throughout the audit by representatives from the Ministry of Agriculture, Livestock and Food Supply (*Ministério da Agricultura, Pecuária e Abastecimento* – MAPA).

An opening meeting was held on 15 April 2013 with the central competent authorities, during which the objectives, itinerary and the standard reporting and follow-up procedures of the audit were confirmed, and additional information necessary for the satisfactory completion of the audit was requested.

2 OBJECTIVES

The overall objectives of the audit were to assess whether the animal by-products (ABP) and derived products not intended for human consumption intended for export to the European Union (EU) satisfy guarantees at least equivalent to those set out by Regulation (EC) No 1069/2009 of the European Parliament and of the Council and Commission Regulation (EU) No 142/2011.

In terms of scope, the audit concentrated on official controls on the main ABP and derived products exported to the EU, namely raw material for the production of pet food, processed animal proteins and pet food (raw and processed) including dogchews.

In pursuit of the above objectives, the audit itinerary included the following visits:

Visits		No.	Comments
Competent authorities	Central	√	Opening and closing (de-briefing) meetings
	Regional	1	Meeting with SFA authorities in the states visited
	Local	3	Discussions with local State services held in the course of site visits
Operators' sites			
Slaughterhouses	3	Two slaughtering poultry and one slaughtering bovine	
Processing plants	3	All attached to the slaughterhouses visited	
Pet food plants	4	Three exporting pet food to the EU and one producing on other, non-EU markets	

3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation, in particular Article 50 of Regulation (EC) No 1069/2009, which specifies that Article 46 of Regulation (EC) No 882/2004 of the European Parliament and of the Council shall apply to EU controls in third countries carried out to verify compliance with legislation on ABP and derived products.

A full list of the legal instruments referred to in this report is provided in the Annex and refers, where applicable, to the last amended version.

4 BACKGROUND

This was the first FVO audit to Brazil concerning ABP and derived products exported to the EU.

4.1 LEGAL FRAMEWORK FOR IMPORTS

Article 41 of Regulation (EC) No 1069/2009 lays down requirements for the importation of ABP and derived products into the EU. Specific requirements for imports are laid down by Article 25(3) of Regulation (EU) No 142/2011 and set out by its Annex XIV. In particular, this Annex sets out the list of third countries or their parts from which consignments can be imported into the EU. Brazil is listed, amongst others, for ABP and derived products under the scope of this audit.

4.2 INFORMATION ON THE SECTOR OF ABP AND DERIVED PRODUCTS

According to the central competent authority there are 86 pet food plants in the country of which 7 are approved for export to the EU (6 process pet food and 1 only flavouring innards). Pet food plants source poultry meal (feather and viscera meal) and bovine or pig meat and bone meal ⁽¹⁾ from processing plants which are either attached to slaughterhouses (341) or self-standing (in which case, they process ABP originating from various slaughterhouses and cutting plants).

According to the central competent authority only slaughterhouses approved for export to the EU can supply ABP to be used as ingredients in pet food exported to the EU. In addition, only such slaughterhouses can export directly ABP to the EU as raw material for pet food production. According to the central competent authority there are 104 such slaughterhouses (56 for bovine, 36 for poultry and 12 for pigs) supplying ABP for production of pet food.

In slaughterhouses with attached processing plants, the transfer of ABP from the slaughterhouse to the processing facilities is carried out through pipes and pneumatic systems. If ABP are collected from more distant locations, processing plants' operators use vehicles belonging to sub-contracted transport companies or their own transport. These vehicles are usually dedicated for transport of ABP only. Most of the ABP are delivered to processing plants within a few hours after being harvested in slaughterhouses, therefore the majority of the vehicles are not equipped with chilling systems. The design of vehicles with compartments allows for transport of blood, feathers and other ABP separately. According to the central competent authority there are no entities acting as intermediate collection points for ABP.

Specified risk material (SRM) as defined in Annex V to Regulation (EC) No 999/2001 of the European Parliament and of the Council is considered to be Category 1 and, as such, it cannot be used for the production of pet food and related products. Brazil is recognised as a country of negligible BSE risk by Commission Decision 2007/453/EC and, therefore, does not generate SRM (this material originates only from Member States and from third countries of a controlled or undetermined BSE risk). Nevertheless, the Brazilian competent authorities have put in place rules for the separation, handling and disposal of SRM, so that it is not used in the production of pet food and related products. According to the competent authority ruminant slaughterhouses and cutting plants separate and collect SRM, which is disposed of either by incineration in slaughterhouses or buried as unprocessed material on approved landfill sites.

¹ EU legislation allows the use of processed animal protein for the production of pet food. However, for ease of reference and in order to retain the terminology used in Brazil, the terms “animal meal” (or “poultry meal”, etc.) are used throughout the report.

The central competent authority declared that fallen bovine and pigs (either dead at farm or during transport) are not used for production of meat and bone meal. These animals are either buried or burned at farms or, if death occurs during transport, they are incinerated at slaughterhouse premises following a pathological examination.

The following table presents the figures provided by the competent authority concerning the production of ABP and the volume of animal meal obtained per species in 2011 and 2012.

species	2011 (in tonnes)		2012 (in tonnes)	
	ABP	meals	ABP	meals
poultry	2,965,055	807,311	2,872,896	782,803
bovine	836,129	240,392	978,113	291,767
pigs	6,145	1,629	18,238	4,993
bovine / pigs (mixed)	3,239,819	895,147	3,528,385	976,592
other	2,289	557	696	171

* the data does not reflect the quantities of blood and feather meal

According to the data presented by the competent authority, in 2011 and in 2012, the export to the EU, respectively amounted to:

- 2,260 and 2,590 tonnes of processed pet food, dispatched in packagings intended for the final customer, and
- 19,640 and 34,342 tonnes of ABP destined for production of pet food, mainly in blocks of deep-frozen material of poultry origin.

5 FINDINGS AND CONCLUSIONS

5.1 SYSTEM FOR OFFICIAL CONTROLS

5.1.1 Legislation and competent authorities

Legal requirements

Article 46(1)(a), (b), (c) and (d) of Regulation (EC) No 882/2004 lays down that EU controls in third countries shall have particular regard to the legislation and competent authorities of the third country.

Findings

5.1.1.1 Legislation

National legislation lays down some requirements for harvesting, handling, processing and use of ABP and derived products, including production of pet food. Moreover, it stipulates what models of health certificates should be used for export of processed pet food and ABP destined for pet food production in the EU.

- The competent authority declared that national legislation does not provide distinction between various categories of ABP as it is foreseen in EU legislation. Therefore, with the exception of SRM, all other ABP originating from slaughterhouses and cutting plants are used for production of derived products (animal meal) which are subsequently used as an ingredient for pet food.

- The audit team noted that national legislation does not provide a list of materials that are not eligible for production of pet food exported to the EU (because in accordance with EU legislation they are defined as Category 2 – see section 5.2.2.1). Moreover, national legislation sets out processing requirements and parameters only for ABP of ruminant origin; for other species there are no requirements in the legislation and no provisions on the validation and monitoring of the processing methods, which compromises the validity of the information certified in the export health certificates (see section 5.2.2.2).

5.1.1.2 Structure and organisation of the competent authorities

There are three levels of government administration (federal, state and municipal) involved in planning and executing of official controls on the area of ABP and in the production of pet food.

MAPA is the central competent authority responsible for legislation, enforcement and organisation of official controls covering, amongst the others, handling of ABP and production of pet food.

One of the five secretariats of MAPA, namely the Secretariat of Animal and Plant Health and Inspection (SDA) is the main body responsible for issues related to ABP and pet food. Within SDA, two departments share responsibilities in these areas: the Department of Inspection of Products of Animal Origin (DIPOA) and the Department of Livestock Input Inspection (DFIP).

- DIPOA is responsible for public health matters. As regards ABP and derived products DIPOA is responsible for: a) ABP generated in establishments from the meat sector, b) processing plants, and c) the use of derived products (other than for feeding purposes).
- DFIP is responsible for controls in the field of veterinary medicines and animal feedstuffs, including the production of pet food and the use of animal meals for production of feedingstuffs.

At State level, the Federal Agricultural Superintendencies (SFAs) are responsible for the coordination and supervision of municipal bodies and also for carrying out some official controls in the area of ABP and production of pet food. Within SFAs, both DIPOA and DFIP are represented by the State Inspection of Products of Animal Origin (SIPOA) and the State Livestock Input Inspection (SFIP), respectively.

At municipal level, official controls are carried out by federal inspectors from SIPOA or SFIP. In slaughterhouses, cutting plants and processing plants SIPOA inspectors work on a permanent basis and are assigned to individual establishments, and in pet food plants SFIP inspectors carry out regular but periodical controls.

SDA has six coordinating services. One of these is the Coordination for International Agricultural and Livestock Surveillance (VIGIAGRO), responsible for issues related to import and export controls and certification of food, feed and other products of plant and animal origin. VIGIAGRO has its offices at border control points, ports and airports. Depending on export volumes, the offices are called either VIGIAGRO or the State Units of Agricultural Surveillance (UVAGRO).

Detailed information on the organisational structure of MAPA can be found at:

www.agricultura.gov.br

- The audit team noted that the roles of the different bodies in charge of controls on ABP, production of pet food and certification of these products for export to the EU were established and clearly understood by the officials met. No gaps or overlaps in the distribution of responsibilities between the control bodies were identified.

5.1.1.3 Powers and independence of the competent authorities

According to the competent authorities in case of non-compliances several measures are foreseen in legal acts, including warnings, fines, and confiscation of products, interdiction of activities and suspension or cancellation of approvals.

- The audit team noted that federal inspectors of all levels have all necessary legal powers to carry out inspections and control activities, including sampling, in all States throughout the country.
- The competent authority presented documentary evidence as regards measures taken in the case of non-compliances, which included warnings, fines and temporary suspensions.

5.1.1.4 Training of staff

The DIPOA and DFIP representatives met stated that federal inspectors receive regular training on EU legislation in the areas of food and feed hygiene, animal health and welfare, and certification of goods to be exported to the EU; they also attend periodical meetings during which they discuss issues concerning these areas.

- The competent authority presented documentary evidence of training sessions and meetings organised for the federal inspectors. However, the audit team noted that these trainings and meetings did not cover ABP related issues, in particular production of pet food and the requirements for its export to the EU. With the exception of one inspector, all the other federal inspectors met stated that so far they did not receive training concerning such issues. This negatively affected their understanding about the requirements for the material to be used for production of pet food and some other requirements set out in the health certificates for export to the EU (see sections 5.1.3 and 5.2.2).

5.1.1.5 Supervision to which the competent authorities are subject

According to the competent authority federal inspectors at different levels are subject to regular supervision.

The SFA federal inspectors in slaughterhouses, cutting plants and processing plants are subject to supervision by their superiors from SIPOA as well as by DIPOA officials. These supervision controls are carried out at least once a month and by assessing the way the establishment performs, they conclude on the performance of the federal inspector.

The DFIP representative stated that, the supervision system for DFIP and SFIP officials is not yet finally shaped and it is under ongoing development. Currently, as there is no permanent presence of the SFIP federal inspectors in pet food plants, the supervision on their performance is carried out by the DFIP officials with the minimum frequency of one control every six months. Also in this case supervision focuses on whether the plant operates in line with the legislation and an inspector carries his/her duties appropriately.

- The competent authority presented documentary evidence of supervision activities carried out in the meat sector establishments and in pet food plants. These were carried out regularly and followed the pre-set frequency. However, the audit team noted that supervision did not cover: a) the effectiveness official controls in processing plants by federal inspectors (see section 5.2.2), and b) conditions certified in the health certificates which should provide

guarantees concerning ABP and derived products used as ingredients for production of pet food exported to the EU (see section 5.1.3).

Conclusions

The competent authority in charge of official controls on ABP and derived products under the scope of this audit has been designated and has the necessary legal powers to carry out its attributed tasks effectively. However, national legislation does not set out conditions for the sourcing and processing of ABP used for the production of pet food exported to the EU. Moreover, the competent authorities have very limited awareness of the said conditions as laid down in EU legislation. All this affects negatively the ability of the competent authorities to ensure the reliability of official certification (see section 5.1.3).

5.1.2 Organisation of official controls

Legal requirements

Article 46(1)(e) and (g) of Regulation (EC) No 882/2004 lays down that EU controls in third countries shall have particular regard to official controls and the assurances that can be given regarding at least equivalence to EU requirements.

Findings

5.1.2.1 Documented control procedures

The competent authority representatives stated that official controls are planned and carried out in accordance with written procedures. DIPOA and DFIP have issued several procedures concerning official controls which instruct federal inspectors at State or establishments/plants level about how they should carry out official controls. These procedures contain templates of the inspection reports and check-lists.

- The federal inspectors met presented examples of inspection reports and check-lists for control activities they carried out in the slaughterhouses, ABP processing plants and pet food plants. The majority of the reports contained a description of the purpose of official controls, the elements checked during inspection, indication of conformities and non-conformities identified and, if necessary, requests for actions to be taken by the operator. However, the audit team noted that very little or no attention was given to the issues of the relevance for the conditions attested in the health certificates for pet food exported to the EU (see sections 5.1.3 and 5.2.2).

5.1.2.2 Operation of controls systems based on priorities

The competent authority stated that neither DIPOA nor DFIP have a formal system for prioritisation of official controls in place. The number of inspections for each year is determined at central level.

In slaughterhouses and ABP processing plants the SFA inspectors are present on a permanent basis, and carry out daily routine checks. Every month they perform more profound inspection following elements mentioned on the inspection check-list. Results of this inspection are reported to DIOPA though SIPOA. All slaughterhouses exporting to the EU are, four times a year, subject to controls carried out either by the officials from DIPOA or from SIPOA. The number and the scope of such inspections depends on the results of the monthly controls reported to DIPOA.

Depending on the availability of human resources and location of the establishments neither DFIP nor SFIP inspectors carry out control visits in feed establishments, including pet food plants. Every pet food plant is controlled regularly, according to a pre-set minimum frequency, of at least twice per year. The minimum frequency for inspections can be increased if non-conformities are identified during previous inspections.

- Both SIPOA and SFIP inspectors met carried out their inspections as planned. However, the audit team noted that SFIP inspectors usually announced their visits in pet food plants; SIPOA inspectors permanently based in slaughterhouses with attached processing plants carried out checks in the processing plants mainly if problems concerning operation were reported to them by the plant staff.

Conclusions

There is a system for official controls which are carried out according to documented procedures. Although the organisation of official controls is not priority-based, the competent authority can ensure that controls are regular and that they are carried out in all establishments and plants exporting ABP and derived products, under the scope of this audit, to the EU.

5.1.3 Health certificates

Legal requirements

Article 31 of Regulation (EU) No 142/2011 lays down, amongst others, that consignments of ABP and derived products for importation into the EU shall be accompanied by health certificates in accordance with the models set out in Annex XV. One of the requirements specified in this Annex is that the competent authorities of the exporting country ensure that principles of certification equivalent to those laid down in Council Directive 96/93/EC are followed.

Findings

The competent authority representatives stated that inspectors of different bodies such as SFA, SIPOA, VIGIAGRO and UVAGRO, are involved in the certification process for products exported to the EU, depending on whether it concerns processed pet food or ABP destined for pet food production.

The competent authority issued a circular providing the model of the health certificate for ABP and processed pet food destined for export to the EU. Operators of the plants and establishments exporting their products to the EU are obliged to fill a blank template of the export certificate with all necessary information as well as strike through on the certificate all statements which are not relevant for the specific product destined for export.

According to the competent authority, there is a national sanitary certificate for consignments of ABP or derived products transported within Brazil, which provides all the necessary information for issuing the required export certificates. Despite the fact that since 2008 the national sanitary certificate is not legally required, the competent authority stated that operators of slaughterhouses and processing plants supplying ABP and derived products for production of pet food still use it on a voluntary basis.

- In all the slaughterhouses and processing plants visited, supplying ABP (frozen livers) and derived products (animal meals of poultry and of bovine origin) for production of pet food to be exported to the EU, the SFA inspectors issued national sanitary certificates for all consignments leaving the slaughterhouses and, when appropriate, the processing plants. However, the audit team noted that a reliable attestation of the conditions set out in the

export health certificates for ABP or processed pet food destined to the EU cannot be made using the national sanitary certificates, as they do not contain the necessary information:

- national sanitary certificates accompanying ABP destined for processing did not contain any information about the type or category of ABP;
- national sanitary certificates accompanying (from processing plants to pet food plants) animal meal destined for production of pet food to be exported to the EU, did not contain information concerning the processing method used and the category or type of the material processed.
- In one of the poultry slaughterhouses visited, receiving also ABP originating from another poultry slaughterhouse, the national sanitary certificate accompanying the latter ABP did not indicate the category or type of ABP. The audit team noted that poultry animals dead during transport (which are Category 2 material) have been regularly received and dispatched for processing (see section 5.2.2.1).
- In all States visited, the export health certificates accompanying the consignments of ABP and processed pet food complied with the model required by the EU legislation.
- In one of the poultry slaughterhouses visited, directly exporting to the EU ABP (deep-frozen livers) for production of pet food, all livers were harvested from birds which passed ante- and post-mortem examination and were fit for human consumption. The audit team noted that the information inserted in the export health certificate in this respect was correct.
- In all pet food plants visited, exporting processed pet food to the EU, the statements included in the export health certificate were stroked through by the plants' staff. The audit team noted that although the staff always crossed-out the statements uniformly in each plant, it did not understand the meaning of the statements. The statements to be deleted were worked out once between the company and SFIP and after that all certificates were filled in in the same way as regards these statements.
- The competent authority stated that an export health certificate filled in with information by the operator (known at this stage a compliance certificate) has to be delivered to UVAGRO or VIGIAGRO officials to be signed and converted to a bi-lingual export health certificate which accompanies the exported consignment. In this respect the audit team noted the following:
 - In all pet food plants visited, exporting processed pet food to the EU, the operators met always supplied the compliance certificate prior the shipment. However, they provided additional documents, which could support confirmation of the information and statements contained in the export health certificates to be signed by the UVAGRO or VIGIAGRO officials, only following a direct request from these officials. The audit team confirmed that this request (for additional information) was made only in one of the three States visited. In that State the officials asked operators for documents confirming: a) the origin of ABP (national sanitary certificate), b) the parameters of the processing method used (operators' declaration or a copy of the processing records) and, c) the results of microbiological analyses. In the two other States visited the officials attested the guarantees of the export health certificates without any supporting documentation.
 - In the UVAGRO and VIGIAGRO offices visited, the audit team noted that compliance certificates and the relevant export health certificates (bi-lingual version) had sometimes different individual numbers not allowing for linking between the two certificates. The match was possible after use of some additional information extracted from invoices attached for fiscal reasons.

- In all visited plants and establishments exporting pet food to the EU, the audit team verified, at random, some consignments dispatched from the plants and noted that for traceability purposes the operators registered and kept all compliance certificates issued, which were easily accessible and complete.
- In the pet food plants visited the audit team noted that, even if operators did not provide the microbiological laboratory results to the certification officials, they carried out the analyses for products to be exported to the EU, and their results were available in the plants (see section 5.2.2.3). In all cases, the analyses were carried out in external private laboratories approved by the competent authority for this purpose.
- According to the competent authority only 104 slaughterhouses are approved for direct export of ABP for production of pet food in the EU (see section 4.2). However, the audit team noted that the list of approved establishments (published on 2 April 2013, Ref. No 00035) contains 189 slaughterhouses. According to the competent authorities this discrepancy may be due to delays in updating the list. The list is published on the page informing about the slaughterhouses eligible for export to the EU and is available also at:

https://webgate.ec.europa.eu/sanco/traces/output/BR/ABP-SH_BR_en.pdf

According to the competent authority only 7 pet food plants are approved for export of processed pet food to the EU. The audit team noted that the list of approved pet food plants (published on 5 April 2013, Ref. No 00046) contains 17 plants. The list is published on the page informing about the plants allowed for export to the EU and is available also at:

https://webgate.ec.europa.eu/sanco/traces/output/BR/ABP-FSB_BR_en.pdf

The audit team noted that the published lists are used both by the certifying authorities in Brazil (UVAGRO/VIGIAGRO) in order to issue export certificates, and by the competent authorities in EU Member States in order to accept imports of ABP and derived products under the scope of this audit.

Conclusions

The health certificates accompanying consignments of processed pet food and ABP for production of pet food destined for export to the EU are in line with the models set out in the Annex XV to Regulation (EU) No 142/2011, as required by Article 31 of the said Regulation.

The provision of the Annex requiring that certification follows the certification principles laid down in Directive 96/93/EC is complied with, as regards ABP (deep-frozen chicken livers) exported to the EU for production of pet food. However, this requirement is not met for processed pet food exported to the EU due to weaknesses in the certification chain, resulting in the attestation of conditions that are not authentic. In this respect, a) the information concerning the type of ABP used is neither verified nor recorded, resulting in Category 2 material being used for production of processed pet food exported to the EU, and b) the guarantees concerning the processing methods, processing parameters and the results of microbiological analyses were mostly produced without availing of the proper information (see section 5.2.2).

Finally, there are plants and establishments that appear in the list as approved for export to the EU, despite the fact that they are not approved by the Brazilian competent authorities for this purpose. Therefore, there is a risk that ABP and derived products under the scope of this audit are imported from non-approved premises. This has to be seen in a context where these plants and establishments are subject to the same official controls regardless of their status concerning exports to the EU (see section 5.2.1).

5.2 OFFICIAL CONTROLS ON REQUIREMENTS ALONG THE CHAIN

5.2.1 *Plants' approval / registration and official controls*

Legal requirements

The health certificates laid down by Article 31 of Regulation (EU) No 142/2011 and set out in Annex XV require, amongst others, that ABP and derived products exported to the EU have been prepared and stored in a plant approved, validated and supervised by the competent authority in accordance with Article 24 of Regulation (EC) No 1069/2009.

Findings

The competent authority issued the procedures for approval and listing of establishments and plants exporting to the EU. In the context of this audit, these are slaughterhouses directly dispatching ABP and some pet food plants.

The competent authority representatives stated that each slaughterhouse and pet food plant, irrespective of whether or not it is exporting to the EU, is subject to regular inspections which are carried out in slaughterhouses at least every month and in pet food plants at least twice a year.

According to the competent authority none of the processing plants is approved for export of derived products under the scope of this audit to the EU.

- All the slaughterhouses visited were approved for export of fresh meat to the EU. In addition they were also approved as suppliers of ABP for production of pet food. Only one of the slaughterhouses was approved for exporting unprocessed ABP to the EU and regularly exported ABP (deep-frozen chicken livers) directly to its customers in the EU.
- All the slaughterhouses visited had attached ABP processing plants but none of the plants was approved for export of derived products to the EU. The audit team noted that derived products from all the processing plants visited (irrespective of the type of the approvals issued for the attached slaughterhouses) were sent to pet food plants approved for production of pet food destined to the EU.
- All but one of the pet food plants visited were approved for export of processed pet food to the EU. The pet food plant without the EU export approval has not yet applied for such approval as it was not interested in placing its products on the EU market.
- In all state and federal offices visited officials met were familiar with procedures for approval and listing of the plants. The audit team verified several approval files and noted that these followed the procedures. However, in the SFA office visited the audit team noted that two slaughterhouses, which obtained their approvals for export of ABP for production of pet food in the EU, were still not mentioned on the list of establishments approved for export to the EU. One of the slaughterhouses obtained its approval in March and the other in November of 2012 (see section 5.1.3).
- All slaughterhouses and pet food plants visited were subject to regular controls by the competent authority and the number of official controls met the inspection target. Inspectors met documented results of their controls in a form of inspection reports, when appropriate, accompanied by check-lists. The reports contained a clear description of findings and non-compliances were summarised at the end of the report. The reports contained also, when appropriate, the requests for removal of shortcomings and the deadlines for these actions. The audit team noted that although inspectors informed operators about the results of official controls, they did not always leave them a copy of the inspection report.

- In the slaughterhouses, the processing plants and the pet food plants visited, the audit team noted that scope of official controls mainly focussed on the hygiene and general maintenance conditions. The audit team noted that although the check-lists used by inspectors for the purpose of the approval process reflect on the requirements laid down in national legislation, they do not request inspectors to verify: a) the type of ABP used for production of derived products, b) the processing parameters and their monitoring arrangements for ABP other than those of ruminants origin, and c) microbiological checks on final products in pet food plants. All these resulted in the said elements not being checked, even though all of them are relevant for processed pet food destined for export to the EU and are laid down in export health certificates (see sections 5.1.3 and 5.2.2).

Conclusions

The competent authority carries out regular and frequent controls in slaughterhouses and pet food plants exporting to the EU and have relevant procedures in place for approval of such premises. However, these controls do not reflect requirements which are, at a later stage, acknowledged in the export health certificates for ABP and processed pet food destined for export to the EU. This affects negatively the reliability of the official certification procedure (see section 5.1.3).

5.2.2 Official controls on production requirements

Legal requirements

The health certificates laid down by Article 31 of Regulation (EU) No 142/2011 and set out in Annex XV establish, amongst others, requirements for the production of ABP and derived products exported to the EU. These requirements concern, notably, the material used for production, processing standards, microbiological criteria, and storage conditions.

Findings

5.2.2.1 ABP used for production

Brazil is recognised, since 2012, as a country of negligible BSE risk (see section 4.2). The competent authority declared that a policy concerning SRM is in place and all slaughterhouses for ruminants must remove and dispose of SRM. Only ileum is considered as SRM from the entire intestinal tract, therefore all other parts of bovine intestines are considered fit for human consumption. These are harvested and placed on the local market or exported to other third countries.

- In the bovine slaughterhouse visited SRM was removed and placed, unmarked, in special containers for further disposal. Bovine animals that died during transport were examined and subsequently incinerated in the slaughterhouse's incineration facility. The SFA inspector responsible for official controls in this slaughterhouse stated that in 2012 there were 11 such animals. He also stated that bovine fetuses are regularly found during post-mortem examination of cows and, in such situations, they are collected together with other ABP and dispatched for processing in an attached processing plant. The audit team noted that the obtained animal meals were dispatched to pet food plants exporting processed pet food to the EU.
- In both poultry slaughterhouses visited, birds which died during transport to the slaughterhouses were mixed together with other ABP originating from the slaughtering process and were sent for processing. In one of the slaughterhouses, records showed that in

2011 and 2013 there were, respectively, 172,409 and 122,825 birds. In another slaughterhouse the volume declared by the operator met was approximately 480,000 birds per year. The operators met stated that the average weight of one bird ranged from 1.2 to 1.5 kg. The audit team noted that poultry meal obtained from the processing of mixed ABP is used for production of pet food in plants exporting processed pet food to the EU.

- In all the slaughterhouses visited, the material collected from the floor along the slaughtering and cutting lines was mixed together with other ABP and subsequently processed. The obtained animal meal are used for production of processed pet food in plants exporting pet food to the EU.
- In the processing plants visited the audit team noted that all ABP received from slaughterhouses were processed on the same lines and there was no arrangement in place allowing for separation between various categories of ABP.
- The audit team noted that federal inspectors present in slaughterhouses for supervising the processing do not pay attention to the category of ABP sent for processing and subsequently used for production of pet food. The inspectors explained that since neither the national legislation nor the check-lists contain provisions in this respect, they do not verify it.
- The audit team noted that neither officials nor operators of the processing plants visited were aware of the different categories of ABP and about the limitations that apply concerning ABP eligible for production of pet food destined to the EU.

5.2.2.2 Processing standards

- In the processing plants visited monitoring gauges such as thermometers and barometers allowing for visual monitoring of processing parameters were in place and in operation. The operators of these plants had in place arrangements for their regular calibration, supported by the corresponding calibration certificates.
- In the processing plants visited the records of the processing parameters were in place and were kept for a minimum two years. However, the following was noted:
 - In two poultry processing plants, the parameters were recorded manually either in pre-set time intervals or at the beginning, during and end of the process. In the third processing plant for bovine ABP, parameters were recorded constantly by a computer, as required by national legislation. However, although the plants' operators stated that, depending on the material used, at least 15 to 20 minutes were necessary to fill and to empty the cookers, the audit team noted that the processing records showed that the time between batches ranged from 1 to 5 minutes. The operators met could not explain these discrepancies, which were also overlooked by SFA inspectors.
 - In all plants the processing records reflected the time and temperature but only in two plants was the pressure reflected. The operators met explained that not always the time, pressure, temperature and particle size are considered critical for the process, therefore they are not always recorded. In one plant the pressure measured concerned the steam delivered from the boiler to the grid and not the pressure inside the cooker.
- In the pet food plants visited, processing parameters considered critical for the process were more stringent than the limits required by the EU export health certificate for processed pet food. However, only in one of the plants these parameters were reflected in the written control procedures. In all plants processing parameters were recorded manually. Operators had no written procedures in place for the staff concerning the critical values and the way

the parameters should be recorded. The operators explained that each person responsible for this task, prior to taking up duty, follows training and is briefed about the parameters.

5.2.2.3 *Microbiological criteria*

- In all pet food plants visited operators carried out microbiological analyses for their final products and had records of the results of these tests. The audit team noted all operators carried out sampling for the presence of *Salmonella*, and all but one for the presence of *Enterobacteriaceae*.
- The audit team noted that in one pet food plant the operator carried the above-mentioned analyses on a regular basis for each production batch, irrespective of whether the batch was destined for export to the EU or not. In two other plants the analyses was carried out with pre-set time intervals from batches produced just before or during the sampling day. The operators met explained that in their opinion the thermal treatment used for production of processed pet food is safe. Therefore, they mainly collect samples for the purpose of monitoring the effectiveness of the temperature treatment process rather than in order to meet the requirements from the export health certificate. This resulted in some batches exported to the EU not being effectively sampled and verified prior to their dispatch. This has been overlooked by federal inspectors during official controls.
- The audit team noted that all laboratory results for the presence of *Salmonella* and *Enterobacteriaceae*, presented by operators, complied with the limits laid down in the export health certificate for processed pet food to be exported to the EU. The operators stated that during recent years they had no non-compliant results.

5.2.2.4 *Storage conditions*

- In the slaughterhouses, processing and pet food plants visited, the storage of ABP (deep-frozen chicken livers), derived products (animal meals of poultry and bovine origin) and processed pet food were clean, covered and kept in satisfactory hygienic conditions. In all these premises operators had procedures and pest control programmes in place. Facilities prevented the access of unauthorised persons or workers from other sections.

Conclusions

Official controls can ensure that the requirements for the production of ABP and derived products exported to the EU, laid down in models of the health certificates set out in the Annex XV to Regulation (EU) No 142/2011 in accordance with Article 31 of the said Regulation are complied with as regards the storage conditions and general and hygienic requirements.

However, conditions at least equivalent to EU requirements concerning ABP used for production, the processing standards and microbiological criteria are not met, which is often overlooked by official controls. In particular: a) ABP used for the production of animal meal for subsequent use in the production of processed pet food contain Category 2 material, b) records of processing standards cannot ensure that the required parameters have been achieved, and c) for microbiological criteria in processed pet food, the scope of analyses does not always cover *Enterobacteriaceae* and sampling is not consistently carried out for exported consignments.

6 OVERALL CONCLUSIONS

There is a system for official controls along the chain of ABP covering also production of pet food which can ensure that export of ABP (deep-frozen chicken livers) for production of pet food largely complies with the conditions laid down in the health certificates for export to the EU. However, the system cannot provide the same level of guarantees with respect to processed pet food, since gaps in official controls result in Category 2 ABP being used for the production of pet food. Moreover, weaknesses in the certification procedures result in some key conditions being certified without availing of the proper information. Therefore, the guarantees provided in this respect are not equivalent to those set out by EU legislation concerning ABP and derived products.

7 CLOSING MEETING

A closing meeting was held on 26 April 2013 with the representatives of the central competent authorities. At this meeting, main findings and preliminary conclusions of the audit were presented by the audit team. The central competent authorities did not indicate any disagreement with these. During the meeting, additional information as requested by the audit team was provided by the central competent authorities as well as the information about the measures that the competent authority is going to undertake in order to ensure compliance with the conditions attested in the export health certificates for products exported to the EU.

8 RECOMMENDATIONS

The competent authority of Brazil is invited to provide details of the actions taken and planned, including deadlines for their completion, aimed at addressing the recommendations set out below, within 25 days after receipt of the report.

Nº.	Recommendation
1.	To ensure that information inserted and certified in the export health certificates for ABP and processed pet food destined for export to the EU, is accurate and is acknowledged on a credible basis following the certification principles equivalent to those laid down in Council Directive 96/93/EC.
2.	To ensure that lists of establishments and plants authorised to export unprocessed ABP and derived products to the EU and approved in accordance with Article 24 of Regulation (EC) No 1069/2009 are kept up-to-date.
3.	To ensure that ABP used for production of derived products exported to the EU comply with the requirements laid down in models of the health certificates set out in the Annex XV to Regulation (EU) No 142/2011 in accordance with Article 31 of the said Regulation.
4.	To ensure that processing standards used for production of processed pet food exported to the EU comply with the requirements laid down in models of the health certificates set out in the Annex XV to Regulation (EU) No 142/2011 in accordance with Article

N°.	Recommendation
	31 of the said Regulation.
5.	To ensure that processed pet food exported to the EU is analysed for microbiological criteria in accordance with the requirements laid down in models of the health certificates set out in the Annex XV to Regulation (EU) No 142/2011 in accordance with Article 31 of the said Regulation.

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

http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_inspection_ref=2013-6742

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
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. 142/2011	OJ L 54, 26.2.2011, p. 1-254	Commission Regulation (EU) No 142/2011 of 25 February 2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products and derived products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that Directive
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
Reg. 999/2001	OJ L 147, 31.5.2001, p. 1-40	Regulation (EC) No 999/2001 of the European Parliament and of the Council of 22 May 2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies
Dec. 2007/453/EC	OJ L 172, 30.6.2007, p. 84-86	2007/453/EC: Commission Decision of 29 June 2007 establishing the BSE status of Member States or third countries or regions thereof according to their BSE risk