

## ANNEX

Response of the Competent Authorities of Brazil to the recommendations of Report ref. DG(SANCO)/2013-6703 -MR of an audit carried out from 09 September 2013 to 20 September 2013 in order to evaluate the control systems in place governing the production of poultry meat and products derived therefrom intended for export to the European Union .

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N°	Recommendation	Action Proposed by the Competent Authority
1	<p>The CA should ensure that ante-mortem inspection is carried out in accordance with Regulation (EC) 854/2004. In particular, requirements laid down in point B.1. (a) Chapter II Section I of Annex I to Regulation (EC) No 854/2004 shall be taken into account (the official veterinarian is to carry out ante-mortem inspection of all animals before slaughter).</p>	<p>DIPOA believes that ante-mortem inspection is carried out in accordance with Regulation (EC) 854/2004, in particular with requirements laid down in point B.1.(a) Chapter II Section I of Annex I to Reg. (EC) 854/2004, through the permanent participation of the official veterinarian (OV) in carrying out <i>ante mortem</i> inspection of all animals before slaughter.</p> <p>This ante mortem inspection, carried out by the OV, begins with an assessment of the health information pertaining to a given lot of birds provided in the Health Bulletin by the veterinarian in charge (VC), working for the Ministry of Agriculture (MAPA)'s Animal Health Service. This analysis enables the OV to determine the slaughter conditions of lots showing any abnormality and/or signs of some health change in such a way as to prevent slaughter of suspect poultry alongside healthy poultry. In addition to the document check, all birds arriving at the slaughterhouse are visually inspected by a duly trained Inspection Auxiliary (IA) who is permanently supervised by the OV. In addition to the visual checks carried out by the inspection team headed by the OV, where there is an observed need for a more accurate examination of the birds, the OV in charge of the inspection team carries out the necessary clinical examination, <u>thus assuring by means of this ante mortem inspection, total control over birds that will be approved for slaughter, or otherwise</u>. DIPOA thus reiterates that Point B.1.(a) Chapter II Section I of Annex I of Reg. (EC) 854/2004, is met by the permanent participation of the official veterinarian (OV) carrying out ante mortem inspection of all animals before slaughter.</p>
2	<p>The CA should ensure that ante-mortem inspection is carried out in accordance with Regulation (EC) 854/2004. In particular, requirements laid down in paragraph 1 Part B Chapter V, Section IV of Annex I to Regulation (EC) No 854/2004 shall be taken into account (checks to be carried out personally by the official veterinarian).</p>	<p>DIPOA demonstrates that post-mortem inspection is carried out in accordance with Reg. (EC) n° 854/2004. One hundred percent (100%) of poultry carcasses and viscera are inspected at the specific section of the slaughter process called the Inspection Line by duly-trained Inspection Agents (IAs) permanently supervised by the Official Veterinarian (OV).</p> <p>In addition to post mortem inspection, it must be pointed out that all birds slaughtered have also been submitted to prior ante mortem inspection, and therefore there is control of the focus of attention to be maintained during the performance of post mortem inspection on a given lot, aiding the work of the inspection team headed by the OV. In addition to 100% inspection of birds at post mortem, the OV verifies the work carried out by his or her team at least once per shift, as well as whenever necessary, based on</p>

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		<p>technical-veterinarian science, verifying the team's performance, and personally carrying out the examination of carcasses and viscera. In addition to this check, the OV analyses all causes of condemnation in all lots, by checking the Official Condemnation Sheet, which is kept updated and signed in the local Federal Inspection Service (SIF).</p> <p>DIPOA thus asserts that it maintains a permanent team in all poultry slaughterhouses that are inspected by SIF, headed by an OV who guarantees control over post mortem inspection by permanent participation in 100% of birds slaughtered.</p>
3	<p>The CA should ensure that procedures based on HACCP principles are maintained by FBOs in line with the requirements of Article 5 of Regulation (EC) No 852/2004, namely all hazards must be addressed by the HACCP systems, in particular in relation to <i>Salmonella</i>.</p>	<p>DIPOA asserts that poultry slaughterhouses inspected by SIFs possess HACCP programs that have been accepted and introduced. The HACCP plans for poultry processing plants contain risk analyses for <i>Salmonella</i> that aim to control and reduce the pathogen. In addition to this information, and in compliance with the EU recommendation, DIPOA will carry out a training programme for official veterinarians in order to harmonise a method for official verification of maintenance of HACCP principles by inspected poultry slaughterhouses, above all concerning <i>Salmonella</i>.</p>
4	<p>The CA should guarantee that only those establishments with standards equivalent to those of the EU are included in the list of establishments authorised for EU export of poultry meat and products derived there from, in line with Article 12 of Regulation (EC) No 854/2004, in particular adequate de-listing procedures should be put in place and implemented.</p>	<p>With immediate effect, DIPOA issued Circular 005/2013, attached hereto, in order to update the eligibility status of establishments on the list of establishments authorised for EU export of poultry meat. The data will be updated annually so that the authorisation status is maintained in accordance with what each establishment performs.</p>
5	<p>The CCA should ensure that laboratories analysing official samples of poultry meat and products derived therefrom intended for export to the EU are accredited in accordance with an appropriate standard (e.g. EN ISO/IEC 17025).</p>	<p>The General Coordination for Laboratory Support—CGAL, through Normative Instruction N° 57 issued 11/12/2013, laid down criteria and prerequisites for accreditation and monitoring of laboratories by MAPA—Ministry of Agriculture, Livestock, and Food Supply. Article 65 of the said Normative Instruction lays down that accreditation and recognition of laboratories will have up until June 2014 to receive ISO 17025 accreditation.</p>

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6	<p>In order to guarantee equivalence with EU requirements, the CAs should ensure that the deficiencies recorded by the audit team are corrected in the establishments visited and are not present in other listed ones (see Annex II to Regulation (EC) No 852/2004, and Section II of Annex III to Regulation (EC) No 853/2004).</p>	<p>DIPOA immediately published Circular 006/2013 and Circular 007/2013, which are attached. They determine that SIFs, SIPOA/SISA/SIFISAs must verify the status of the items listed as non-compliances in Report ref DG (SANCO)/2013-6703, for all establishments listed to export poultry products to the EU, and report back to DIPOA on the same. Additionally, these items will be verified by state-level "supervisions" and federal-level "audits" carried out by the central authorities on establishments.</p>
7	<p>In order to comply with the requirements of the animal welfare attestation contained in the veterinary certificate for poultry meat in Regulation (EC) No 798/2008, the CAs should ensure that the deficiencies in relation to animal welfare identified by the audit team are corrected.</p>	<p>In order to address the deficiencies in Animal Welfare identified by the audit team, DIPOA, in collaboration with WSPA, is carrying out training programmes to meet the requirements for an Animal Welfare Certificate laid down in the official Veterinary Certificate for poultry meat (Reg. N° 798/2008).</p> <p>WSPA (a partner entity to MAPA's Animal Welfare Commission) has carried out recycling and updating courses in those states of Brazil with the densest concentration of establishments exporting poultry meat to the EU.</p> <p>It has trained corporate technical staff and Federal Veterinarian Inspectors (FFAs) from Paraná, Santa Catarina, Rio Grande do Sul, São Paulo and Minas Gerais.</p> <p>On these courses, participants were brought up-to-date on Animal Welfare prerequisites at slaughter, in compliance with Regulations N° 798/2008 and 1099/2009.</p> <p>MAPA additionally proposed a draft Amendment to Normative Instruction n° 03/2000, which addresses humane slaughter, and is currently in the final phase of evaluation by its legal consultancy.</p>
8	<p>The CAs should ensure that official veterinarians participating in the EU export certification chain are familiar with the EU requirements as referred to in the EU export certificates (Part II.2, Annex III to Decision 2007/777/EC) and in the commodity specific EU export certificates (Part 2, Annex I, to Commission Regulation (EC) No 798/2008).</p>	<p>DIPOA will draft a schedule of training programs to include updating in pre-requisites to be met for the export of meat products to the EU. Those training programmes will also be taught in order to bring audit procedures up-to-date (both state-level "supervisions" and federal-level "audits") and will focus on verification of awareness of, and compliance with, European legislation on the part of establishments and the Federal Inspection Service.</p>

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9	<p>The CCA should ensure that the sampling plan and serotyping for <i>Salmonella enteritidis</i> and <i>Salmonella typhimurium</i> in fresh poultry meat intended for export to the EU is equivalent to that in points 1.28 of Annex I to Regulation (EC) No 2073/2005.</p>	<p>The Department of Inspection of Animal Products—DIPOA, in Normative Instruction 70/2003—PRP <i>Salmonella</i>, lays down that every positive test for <i>Salmonella</i> spp. in the analysis of poultry carcasses sampled in the sampling plan must be sent for serotyping. However, there have been delays in processing the samples and receiving the laboratory results, which is a situation that DIPOA and CGAL aim to solve completely within the First Half of 2014, thus guaranteeing that every positive test for <i>Salmonella</i> will be serotyped, assuring compliance with point 1.28 of Annex I Regulation (EC) n° 2073/2005. A training course will also be held in order to standardise sampling procedures, aiming to comply with point 1.28 of Regulation 1086/2011. We would like to ask DGSanco to allow technical experts from Brazil to be sent in order to verify compliance with point 1.28 of Annex I Regulation (EC) n° 2073/2005 by European Union member states, in order to standardise procedures carried out by Brazilian establishments.</p>
10	<p>The CCA should ensure the regularity and rapidity of information supplied on the presence of hazards in food, in particular as regards the non-compliant results of EU import controls carried out - RASFF notifications (see Chapter II of Title VI of Regulation (EC) No 882/2004)</p>	<p>The Department of Inspection of Animal Products (DIPOA) asserts that there has been a restructuring at central level of the management of procedures regarding the receiving of international notification, information flows and responses to the notifying health authorities.</p> <p>A more rapidly-responding communications channel has been set up for receiving notification, and a dedicated team has been put in place to carry out the procedures of receiving, control, traceability and distribution of information in order to make the management process of international notifications clearer and more rapid.</p> <p>The dedicated DIPOA team, after receiving an international notification, will thus begin all procedures put in place by the Department to address the notification, carrying out a thorough control of the information received, by means of physical and electronic management of this information and overseeing the deadlines laid down for receiving responses by all agencies involved in the notification in question.</p> <p>DIPOA has thus introduced a spreadsheet for the control and traceability of international notifications, in which each sector of the Department is responsible for filling out the information and managing the documentation instituted by the investigation activities carried out at Central, state and local levels (local level being the company involved in the notification). DIPOA believes that these actions will enable the current fragility to be overcome and it will be possible to minimise the response time between reception of notification by DIPOA and completion of the investigation with immediate response to the notifying country.</p>