FINAL REPORT OF AN AUDIT

CARRIED OUT IN

BRAZIL

FROM 09 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
Executive Summary

This report describes the outcome of an audit carried out by the Food and Veterinary Office in Brazil, from 9 to 20 September 2013.

The primary objective of the audit was to evaluate whether the official controls systems for poultry meat and products derived therefrom destined for export to the EU can provide equivalent guarantees to those required by EU legislation.

The audit team also evaluated the follow-up actions taken by the competent authority in response to the recommendations made following an earlier audit on the same subject carried out in 2011.

The report concludes that there is a control system in place covering the production chain of poultry meat and poultry meat products intended for export to the EU.

However the effectiveness of the system is compromised by:

- Significant delays in official reaction to RASFF notifications compounded by inadequate communication between different competent authorities involved in their investigation.
- HACCP plans which do not appropriately address the Salmonella risk (and prevent RASFF notifications).
- Inadequate responses by competent authorities in cases of significant increases in Salmonella prevalence at farm and establishment level.
- Deficiencies in the implementation of Regulation (EC) No 2073/2005 (particularly as regards Salmonella typhimurium and Salmonella enteritidis as food safety criteria) and in some instances insufficient knowledge of official veterinarians regarding the EU's microbiological requirements.

In addition, the system is undermined and confidence in the competent authorities involved is diminished by their failure to implement five of eight guarantees provided by in response to the recommendations of the previous audit report, namely regarding ante-mortem and post-mortem inspections, official veterinarian knowledge of EU requirements, de-listing procedures and accreditation of laboratories.

The report addresses to the Brazilian competent authorities a number of recommendations aimed at rectifying identified shortcomings and enhancing the control system in place.
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<tr>
<td>AMI</td>
<td>Ante mortem inspection</td>
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<td>AV</td>
<td>Accredited Veterinarian</td>
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<td>CA</td>
<td>Competent Authority</td>
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<td>CCA</td>
<td>Central Competent Authority</td>
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<td>DG(SANCO)</td>
<td>Health and Consumers Directorate-General</td>
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<td>DIPOA</td>
<td>Department of Inspection of Products of Animal Origin</td>
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<td>EC</td>
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<td>FBO</td>
<td>Food Business Operator</td>
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<td>Food and Veterinary Office</td>
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<td>GTA</td>
<td>Animal Transit Document</td>
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<td>HACCP</td>
<td>Hazard Analysis Critical Control Points</td>
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<td>ISO</td>
<td>International Organization for Standardization</td>
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<td>MAPA</td>
<td>Ministry of Agriculture, Livestock and Food Supply</td>
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<td>NI</td>
<td>Normative Instruction</td>
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<td>OV</td>
<td>Official Veterinarian</td>
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<td>PMI</td>
<td>Post mortem inspection</td>
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<td>RASFF</td>
<td>Rapid Alert System for Food and Feed</td>
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<td>SIF</td>
<td>Federal Inspection Service</td>
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<td>SIPOA</td>
<td>Inspection Service of Products of Animal Origin at State Level</td>
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1 INTRODUCTION

The audit took place in Brazil from 09 to 20 September 2013 and was undertaken as part of the Food and Veterinary Office's (FVO) planned audit programme.

The audit team comprised three inspectors from the FVO and one national expert. Representatives from the Competent Authority (CA) accompanied the audit team during the whole audit.

An opening meeting was held on 9 September 2013 with the Central CA (CCA). At this meeting the audit team confirmed the objectives of, and itinerary for the audit, and requested additional information required for its satisfactory completion.

2 OBJECTIVES

The objectives of the current audit were to:

- evaluate whether the official controls systems for poultry meat and products derived therefrom destined for export to the European Union (EU) can provide equivalent guarantees to those required by EU legislation and in particular Regulation (EC) No 798/2008 and Decision 2007/777/EC;

- evaluate the follow-up actions taken by the CA in response to the recommendations made in report DG(SANCO)/2011-8816.

In terms of scope the audit focused on the organisation and performance of the CA, the export certification procedure, the official control systems in place covering production, processing and distribution chains applicable to poultry meat and products derived therefrom to be exported to the EU. Accordingly, relevant aspects of the EU legislation referred to in Annex 1 were used as technical basis for the audit.

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

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<th>COMPETENT AUTHORITY VISITS</th>
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<th>LABORATORY VISITS</th>
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<tr>
<th>PRIMARY PRODUCTION</th>
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<tr>
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<td>2 Broiler farms</td>
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<th>FOOD PROCESSING FACILITIES</th>
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<td>Slaughterhouses</td>
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<td>Cutting plants</td>
<td>12 11 attached to the slaughterhouses visited</td>
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<tr>
<td>Meat product establishments</td>
<td>6 5 attached to the slaughterhouses visited</td>
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3 LEGAL BASIS

The audit was carried out in agreement with the Brazilian Authorities and under the general provisions of EU legislation and, in particular, Article 46 of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls in third countries performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.
Full legal references are provided in ANNEX I. Legal acts quoted in this report refer, where applicable, to the last amended version.

4 BACKGROUND

4.1 HISTORICAL BACKGROUND

Brazil is included in the list of third countries from which the import of poultry meat and poultry meat products into the EU is authorised (Part 1 of Annex I to Regulation (EC) No 798/2008 and Part 2 of Annex II to Decision 2007/777/EC).

A previous audit took place in 2011 (ref. DG(SANCO)/2011/8816) which highlighted deficiencies in relation to establishments, ante-mortem inspection (AMI) and post-mortem inspection (PMI), and the report –published on the Health and Consumers Directorate-General Internet site at http://ec.europa.eu/food/fvo/ir_search_en.cfm – made a number of recommendations to the CAs. Written guarantees were received from the CCA in relation to the implementation of those recommendations.

4.2 PRODUCTION AND TRADE INFORMATION

According to the CCA's data for 2012 over 450,000 tonnes of chicken meat, 26,000 tonnes of turkey meat, 80,000 tonnes of poultry meat preparations and 2,500 tonnes of poultry meat products were exported to the EU.

5 FINDINGS AND CONCLUSIONS

5.1 LEGISLATION AND IMPLEMENTING MEASURES

Legal requirements

Article 46 of Regulation (EC) No 882/2004 states that Commission experts may carry out official controls in third countries in order to verify the compliance or equivalence of third-country legislation and systems with the relevant EU legislation.

Findings

The CCA informed the audit team that for the poultry meat and products derived therefrom exported to the EU, the CAs follow the relevant national legislation and at the same time the relevant EU legislation.

The CCA has issued a number of instructions/circulars with detailed requirements concerning production of poultry meat and products derived therefrom and official controls aimed at providing compliant or equivalent standards to those in EU legislation.

In national legislation competences of the CAs are laid down as well as duties and responsibilities of the Food Business Operators (FBOs).

The audit team noted some disparities between Brazilian and EU requirements regarding AMI and PMI inspections (for details see chapter 5.3.2). The same finding was detected during the audit in 2011.

In addition disparities between EU and national legislation exist regarding:-
• Temperature of meat during cutting and following operations up to packaging (according to Ordinance\(^1\) 210/98, the temperature of the meat in the cutting room should be maintained at no more than 7\(^{\circ}\)C which is not in line with EU legislation) ((for more information see chapter on Hazard Analysis Critical Control Points (HACCP)).

• Microbiological criteria for establishments approved for export to the EU (Circular 12/DICAO/CGI/DIPOA does not include \textit{Salmonella} enteritidis and \textit{Salmonella} typhimurium as food safety criteria in fresh poultry meat).

• Animal welfare rules at the time of slaughter.

Conclusions
The Brazilian national requirements concerning AMI and PMI, as well as some microbiological criteria for fresh poultry meat and temperature of meat during cutting and following operations differ in certain respects from EU legislation and do not fully ensure that the corresponding requirements set out in the health certificate provided for in Regulation (EC) No 798/2008 are met.

\textbf{5.2 Competent authority}

Legal requirements
Article 46 of Regulation (EC) No 882/2004 specifies that official controls carried out in third countries by Commission experts shall have particular regard to the organisation of the third country's competent authorities, their powers and independence. This article also refers to other issues such as the training of staff in the performance of official controls, the existence and operation of documented control procedures and control systems based on priorities.

Findings
The CCA is the Department of Animal Origin Products Inspection (DIPOA) of the Ministry of Agriculture, Livestock and Food Supply. There is a direct chain of command in place between the three levels of the CA represented by the DIPOA at the centre, the Inspection Service of Products of Animal Origin (SIPOA) established in each State, and the Federal Inspection Services (SIFs) at establishment level.

The CAs have the necessary powers to execute their tasks.

Policy, legislation and supervision of the official controls in the poultry meat and poultry meat products sector are key responsibilities of the DIPOA, more specifically of the Division of Inspection of Poultry Meat, Small Game and Eggs (DICAO). The DIPOA grants a final approval to the FBOs wishing to export poultry meat and products derived therefrom to the EU. It also drafts the guidelines/circulars for the inspection and monitoring of production of poultry meat and products in the establishments approved for export to the EU.

The SIPOA oversees the execution of official controls by the SIFs via monitoring, the issuance of guidelines and the supervision of SIFs’ activities in poultry establishments.

The SIFs carry out official controls at establishment level and are present on a permanent basis in slaughterhouses. In the establishments visited by the audit team the SIF consisted of a Head of Service who was an official veterinarian (OV), other OVs, official agents who are assisted by slaughterhouse staff in the execution of certain official tasks. The Head of SIF manages inspection activities, supervises and coordinates the work of SIF, provides training for both official agents and slaughterhouse staff and reports to SIPOA.

\(^1\) Portaria
In two of eleven slaughterhouses visited the OV was not permanently present on site during slaughter as required under Regulation (EC) No 854/2004, and tasks foreseen in the annex to this regulation are not performed as required (in one case the OV was on site only for half of the working shifts, in another case during periods of leave a replacement OV was not assigned to the SIF to cover leave absences of a permanent OV while the second OV at this site was only present for part of working shifts). This issue is currently being dealt with by the CCA who informed the audit team of a recent budget authorisation to recruit new additional official staff for SIFs.

Evaluation of the official control system is made through an audit system (federal level) and supervision (state level) and is regulated by Normative Instruction (NI) No 27/2008. The detailed execution of audits and supervision is described in Circular No 02/08/DICAO/CGI/DIPOA of 08/09/2008.

The frequency of audits by the DIPOA is laid down in NI No 27/2008, and it foresees audits per year in each state of at least 40% of establishments approved for export. This frequency may be increased or specific audit objectives set based on performance indicators of FBOs and analyses of the results of SIFs' inspection activities. During these audits FBO as well as CA performance is assessed. However the audit team noted that the DICAO audit plan for 2012 had not been fully implemented. Out of 78 planned audits only 33 had been carried out.

The frequency for SIPOA supervision is laid down in NI No 27/2008 as at least one routine supervision visit to every establishment per year. The CA informed the audit team that whenever necessary or due to an unsatisfactory performance by either an FBO or a SIF, the SIPOA may carry out additional supervision visits. After such a visit a report is drafted on the FBO's compliance with legislation and a separate report is prepared on the SIF's performance.

In the poultry establishments visited, audit and supervision reports were available to the audit team. The audit team saw evidence, at these sites, that proper follow-up was conducted by the CA when a shortcoming was detected.

According to the CCA training courses for OV in 2011, 2012 and 2013 were targeted at different training topics, including various control techniques such as auditing, sampling and inspection, official control written procedures (e.g. sampling, inspection, export certification), HACCP evaluation, EU legislation applicable to the poultry sector, animal welfare at slaughter, and, hazards in poultry production: in particular *Salmonella* and *Listeria*.

During the audit the team was provided with participation records for different training courses kept at central, state as well as at local level.

The audit team noted that an update on new EU requirements is provided in the form of circulars to the SIFs involved, mainly through an electronic information system called SIGSIF. However in two establishments visited the OV were not aware of food safety criteria in fresh poultry meat (*Salmonella enteritidis* and *Salmonella typhimurium*) required under Regulation (EC) No 2073/2005. This is a repeat finding previously noted during the 2011 audit.

Conclusions

The CAs have appropriate structure and legal powers to perform official controls on poultry meat and products derived therefrom intended for EU export, however control staff were not always aware of the latest updates of EU legislation.
5.3 OFFICIAL CONTROLS OF PRODUCTION AND PLACING ON THE MARKET

5.3.1 Listing procedures

Legal requirements

Article 12(1) and 12(2) of Regulation (EC) No 854/2004 establish certain requirements for establishments involved in exports of products of animal origin into the EU, namely to appear on lists drawn up and updated by the CA in accordance with this Article.

Findings

There are procedures in place for approval and listing of establishments wishing to export to the EU.

An FBO wishing to be listed to export to the EU has to submit to the local SIF, a request for approval. The SIF checks compliance of the FBO with national requirements. Afterwards the SIF sends the FBO’s request to SIPOA together with SIF’s opinion on the FBO’s compliance with conditions for approval (including a copy of the report from the most recent supervision visit done by SIPOA). SIPOA reviews the documents provided by the SIF and forwards their opinion to DIPOA. DIPOA, after evaluation of the documents, carries out an audit of the establishment to verify compliance with EU requirements. If the establishment is found to be in compliance, a circular is issued communicating this approval to all SIPOAs, ports, airports, frontier posts and to the Division of Base Products of the Ministry of Foreign Relations. This circular contains the authorisation for the local SIF to issue International Sanitary Certificates for the establishment listed.

The audit team noted that an assessment of HACCP plans is part of the listing procedures for establishments wishing to export to the EU.

In all establishments visited the audit team found evidence that the listing procedures had been followed and approval documents were available.

However in one establishment visited the audit team noted that since 2008 no cutting activities were being carried out on site although this establishment is still on the list of cutting plants approved for export to the EU. At the time of the audit team visit the layout and facilities available would need substantial adaptation to resume cutting activities. The audit team was informed by the CA that delisting of activities is not sufficiently covered by these procedures. This is a repeat finding noted in the 2011 audit report.

Conclusions

There are adequate procedures in place for approval and listing of establishments intending to export to the EU and they are properly followed by the CA. However, delisting of activities in establishment already approved for export to the EU is not sufficiently covered by these procedures in order to guarantee that list of establishment is keep up-to-date.

5.3.2 Controls specific to slaughterhouses: Ante-mortem and post-mortem inspection.
Animal welfare attestation

Legal requirements

The poultry meat export certificate in Regulation (EC) No 798/2008 outlines requirements concerning AMI and PMI, which should be carried out in line with Chapter V of Section IV of Annex I to Regulation (EC) No 854/2004.
The poultry meat export certificate in Regulation (EC) No 798/2008 outlines requirements concerning animal welfare in the slaughterhouse, that should be equivalent to requirements in Directive 93/119/EC.

Findings

Controls at farm level

The procedures for registration, supervision and control of poultry breeding and poultry fattening farms (broiler and turkey) are laid down in NI No 56/2007.

The audit team visited two poultry farms (both part of an integrated system) that supply birds to slaughterhouses also visited by the audit team. The poultry farms were registered by the CA. Some prerequisites for registration of the farms were in place such as description of sanitary procedures, declaration that best farming practices will be applied and minimum measures in place to assure the facility’s biosecurity. Both farms visited were well maintained and applied adequate biosecurity measures. FBO flock records were properly kept and were available to the audit team. These records contain information regarding veterinary medicinal products and other treatments administered to the birds together with the dates of their administration, occurrence of diseases, mortality as well as feed and water consumption. The audit team noted that the samples for control of the microbiological quality of water (total bacterial count, coliforms, *E. Coli*, *Clostridium perfringens*) were taken and the FBO/company veterinarian is also responsible for sampling for the national *Salmonella* control programme in broilers.

Under this programme each farm must be sampled quarterly for *Salmonella* spp. prior to bird slaughter. The laboratory result is recorded in the document (health bulletin) which accompanies birds to the slaughterhouse. According to the CA a flock with a positive test result for *Salmonella* will be subject to sanitary slaughter under conditions imposed by the OV. A flock is defined as birds of the same age kept on the farm (one flock can cover birds from more than one poultry house).

The audit team noted that in two establishments visited as a part of an action plan to investigate and prevent a recurrence of a Rapid Alert System for Food and Feed (RASFF) notification (related to *Salmonella* detection) all flocks of all farms supplying birds to the slaughterhouse have recently been sampled for *Salmonella*. In addition biosecurity measures on the farms have been reinforced and additional training provided by the company to the farmers. However in one of these cases reviewed the audit team noted that despite more than 30% of *Salmonella* prevalence at farm level no evidence of measures taken at farm level before RASFF notification was available.

The CA stated that it works in close cooperation with the FBO's Accredited Veterinarian (AV) who is certified by MAPA for certain official tasks. The AV is involved in technical support and monitors, under the establishment's internal quality scheme, the health status of the flocks. Under the accreditation mandate, AVs' official tasks include issuing Animal Transit Documents (GTAs), health bulletins, sending monthly epidemiological data (including data on vaccinations carried out in flocks) and notification of disease suspicion and updating farm information to the local CA office. The audit team observed, in the farms visited, that AVs or their assistants (agriculture technicians) were regularly on site (3-4 times per flock lifespan) and records of their interventions were available to the audit team. The AV issues the documents (GTAs and health bulletin) based on flock records and his, or his technicians', monitoring visits to the farms. However the audit team noted in many instances that the birds were not examined within 72 hours before slaughter (in one case this occurred 19 days beforehand). The CA informed the audit team that an examination within 72 hours is not required under Brazilian legislation. In addition it is not required for the AV to visit the flock on the farm (during their lifespan) in order to issue the health bulletin and in some instances the audit team noted that the flock on the farm had never been seen by the AV (only by a technician).
On one of the farms visited the audit team noted that the farm is subject to annual inspections carried out by the CA. Verification of biosecurity measures in place is within the scope of these inspections. Frequency of these inspections varies from state to state.

*Ante-mortem inspection and Post-mortem inspection*

Birds sent to slaughterhouse are accompanied by a GTA and health bulletin. Both documents contain the data and information required in Food Chain Information and in the health certificate under Regulation (EC) No 854/2004. Other than one slaughterhouse visited the audit team observed that birds were accompanied also by the flock records. The GTAs reviewed by the audit team were issued by the AVs. In addition to the information regarding the origin and destination of poultry, the GTAs also provide information allowing traceability of the flock, with data on the health status of the birds and transportation routes.

The CA informed the audit team that the health bulletin issued by the AV arrives at a slaughterhouse within 24 hours prior to slaughter, with the information on identification of birds, their number, diseases detected in the flock, treatments and use of vaccines, and withdrawal periods. The audit team observed that the AV, in some instances, instead of noting the withdrawal period recorded the number of days elapsed since last administration of a veterinary medical product. However the audit team noted that the effective withdrawal period is verified during AMI as well as being monitored as a critical control point under HACCP.

AMI carried out in the slaughterhouse covers:-

- Checks of the GTA and health bulletin.
- Identification of the consignment.
- Animal welfare check.
- Visual inspection of the birds.

As regards AMI at slaughterhouse, the audit team noted that:-

- The OV carries out an evaluation of documents transmitted while the completion of the AMI, including visual inspection of the batch, is carried out by official auxiliaries or slaughterhouse staff. The OV intervenes (clinical inspection of birds) only in case of problems/deficiencies detected. Therefore AMI is not carried out in line with Regulation (EC) No 854/2004.

- Part of AMI (namely visual inspection of clinical status of birds) is not carried out on all deliveries before slaughter in contravention of Regulation (EC) No 854/2004. Only the first truck of the same flock of birds is subjected to visual inspection.

Despite the findings described above the CCA informed the audit team that they consider their AMI system (checks on farm with AMI inspection in slaughterhouse) equivalent to the system required under EU legislation.

The provisions on animal welfare as per Directive 93/119/EC in general were met in the slaughterhouses visited. However in two slaughterhouses visited the audit team noted signs of consciousness in birds after stunning, inadequate stunning parameters used, inappropriate handling of live birds during hanging, long hanging period before stunning (up to six minutes) and pre-stunning shocks to turkeys.

PMI is carried out by slaughterhouse staff under supervision of the OV. However in two slaughterhouses visited the OV was not permanently present during slaughter and PMI was carried without supervision of OV which is not in line with EU requirements. Furthermore the audit team noted that the OV does not personally carry out a detailed inspection of a random sample, from each
batch of birds having the same origin, of parts of birds or of entire birds declared unfit for human consumption following PMI as required by Regulation (EC) No 854/2004. This is a repeat finding noted in the 2011 audit. In some slaughterhouse visited the carcasses condemned were removed from the slaughter line by slaughterhouse staff before evisceration without detailed inspection by the OV.

In all but two slaughterhouses visited comprehensive records of results of AMI and PMI were available and properly kept.

Conclusions

AMI and PMI are implemented in accordance with national legislation and were found to be well organised. However, they are not carried out in a manner fully equivalent to the requirements set out in the health certificate provided for in Regulation (EC) No 798/2008.

Bio-security conditions and documentation kept on farms were adequate.

EU requirements concerning animal welfare were satisfied except in two establishments visited.

5.3.3 Controls at establishment level

Legal requirements

The export health certificates for the relevant commodities contained in Regulation (EC) No 798/2008 and Decision 2007/777/EC requires an FBO to implement a programme based on HACCP principles.


Findings

a) General findings

Official controls are carried out by:-

• DIPOA as establishment audits with a minimum frequency of one audit per 2.5 year.
• SIPOA with a minimum frequency one supervision per year.
• Local SIF with a minimum inspection frequency as prescribed in Circular 12/2010/GAB/DIPOA for each inspection element established.

DIPOA's audits are carried out based on the department's annual programme. The CCA informed the audit team that the auditors are experienced OVs working in the SIFs in charge of EU listed establishments. As a rule they come from a SIF located in a state other than the one being audited.

The OV in charge of each SIF is responsible for implementation of an official control plan, management of work of his/her team, notification of non-conformities detected during inspections to the FBO and verification of the corrective actions taken by the FBO.

In establishments visited the audit team noted that regular inspections, which meet the minimum inspection frequency requirements, are carried out and that the inspection reports were available. During inspections standardised checklists are used. When deficiencies were identified by the CA during an inspection visit and corrective measures were imposed, a proper follow-up was conducted by the CA to verify the correction of any non-compliances by the FBO.

The SIF at monthly intervals sends a report summary of non-conformities detected by SIF to the
SIPOA. The CA informed the audit team that these reports are used to monitor trends and apply some elements of a risk based approach in planning future inspection activities.

b) Slaughterhouses, cutting plants, poultry meat products establishments and cold stores

Eleven of the twelve establishments visited were found by the audit team to be broadly in line with EU requirements. Some minor non-equivalences were noted. For example (Note: not all deficiencies were present in all establishments):

- Ceilings in some localised areas were not maintained in sound condition (paragraph 1 (c), Chapter II of Annex II to Regulation (EC) No 852/2004).
- Premises were not protected against the formation of condensation (paragraph 2(b), Chapter I of Annex II to Regulation (EC) No 852/2004).
- Premises with an airflow from a dirty area to a clean area in contravention of paragraph 5, Chapter I of Annex II to Regulation (EC) No 852/2004.
- Inadequate cleaning and disinfection of knives.
- Installations not preventing contact between the meat and different surfaces in contravention of paragraph 2 (d), Chapter II of Annex III to Regulation (EC) No 853/2004.
- Pooling of water under conveyor belt in cutting room (paragraph 1(a), Chapter II, Annex II to Regulation (EC) No 852/2004).
- Faecal recontamination of carcasses during manual evisceration after PM inspection.
- Works on meat not progressive in the cutting and packaging area (quantity of turkey carcasses waiting to be cut after the air chiller) with temperature >4ºC.
- Potential cross-contamination of carcasses in scalding and plucking room (due to inadequate separation lines with feathered and already plucked carcasses) in three establishments visited.
- No wash-hand-basins in cutting room.

Only some of these deficiencies had been previously detected by DIPOA audit, SIPOA supervision or SIF inspections. The audit team observed that the CA ordered in most instances immediate corrective actions.

The twelfth establishment visited (with several RASFF notifications in 2013 due to microbiological contamination with Salmonella) presented several non-compliances with EU requirements resulting in potential cross-contamination of carcasses such as:-

- Installations not preventing contact between the meat and different surfaces in contravention of paragraph 2 (d), Chapter II of Annex III to Regulation (EC) No 853/2004.
- Potential cross-contamination of carcasses in scalding and plucking room (due to inadequate separation of lines with feathered and already plucked carcasses).
- Inadequate procedures for cleaning and disinfection of knives used for bleeding birds (knives changed at frequency every 30 minutes but not continuously cleaned in between).
- Inadequate cleanliness of carcasses on line.
- Ceilings in some localised areas were not maintained in sound condition (paragraph 1 (c), Chapter II of Annex II to Regulation (EC) No 852/2004).
- Inadequate space for one PMI point not allowing the OV properly carry out supervision of slaughterhouse staff involved in PMI.

Concerning this establishment, the CA promptly presented the audit team with an action plan to
remedy the shortcomings identified.

c) HACCP and own-checks

In the establishments visited HACCP plans were found in place and implemented. However, the audit team found deficiencies related to these plans:

- In HACCP plans reviewed (all based on the same generic HACCP plan template), the *Salmonella* risk was not adequately addressed.

- No instructions were available regarding maximum time limit for frozen meat be kept in the packaging area and no time/temperature monitoring (at the time of FVO audit, frozen meat was found stored in a room with temperature 10°C for more than four hours).

- Presence (in two establishments visited) of meat in the cutting room (after chilling to 4°C) at temperatures up to 8.5°C after deboning although no warm cutting was carried out. This practice is allowed under HACCP plans and approved by the CA in line with national legislation as long as fresh meat reaches a temperature below 4°C within 4 hours after slaughter.

d) Own-checks

The audit team noted a comprehensive own-check sampling programme in place in establishments visited. Microbiological analyses on products, water, ice and surfaces are carried out in either in-house laboratories or external ones. The water and ice samples are taken according to a FBO’s sampling plan largely based on criteria in Council Directive 98/83/EC. Analyses results of water and ice for microbiological criteria (*Clostridium perfringens*, Total Bacterial Count, Coliforms, *E. Coli, Enterococcus*) in establishments visited as well as for physico-chemical parameters were available to the audit team.

The FBOs carry out sampling of various products for microbiological criteria (e.g. Total Bacteria Count, *Salmonella, E. Coli*, Coliforms, *Staphylococcus aureus, Enterobacteriaceae*), including sampling of the meat preparations (*Salmonella* and *E. Coli*) at various frequencies.

The audit team noted in all establishments visited a sampling of meat preparations was always in line with Regulation (EC) No 2073/2005.

However, current EU food safety rules as regards *Salmonella enteritidis* (SE) and *Salmonella typhimurium* (ST) were implemented only in one establishment visited. In other establishments the sampling programmes did not meet EU requirements for ST and SE (less than five samples taken from the same batch and no serotyping carried out in the case of detection *Salmonella* spp).

In establishments visited the audit team noted that FBOs had implemented some additional measures to prevent *Salmonella* presence in products exported to the EU:-

- Fresh poultry meat with non compliant result for *Salmonella* spp. was excluded from the production of meat preparations for the EU market;

- Fresh poultry meat produced from birds tested positive for ST or SE on the farms of origin was excluded from export to the EU. Presence of other *Salmonella* serotypes in test carried out on the farms was not taken into account and fresh poultry meat may be exported.

In two establishments visited the neck skin samples for *Salmonella* spp were taken in line with EU requirements. In other establishments *Salmonella* spp was analysed in samples from different products at various frequencies and number of samples (in general various cuts analysed).

In most establishments visited laboratory results for microbiology of products were compliant. However, in some establishments (those with RASFF notifications) positive results for process hygiene criteria (*Salmonella*) were found. In one establishment visited no evidence of CA actions...
was provided despite 20% positive results for *Salmonella* spp. in fresh poultry meat. In this case a CA reaction took almost one year and was triggered by RASFF rather than the analysis results. The CA informed the FVO team that actions are taken only in cases of non-compliant results in specific official sampling for *Salmonella* under Brazil's "Program of pathogens reduction" (PRP). However in this case the SIF team was aware of both the high prevalence of *Salmonella* in slaughtered flocks (30%) on the farms, and in FBO sampling in the slaughterhouse, but no official action was taken because the limit defined under the PRP to take corrective measures was not reached (more than 12 samples positive in 51 taken). Only in a recent audit carried out by DIPOA, triggered by RASFF notification, were these deficiencies detected.

Methods used for *Salmonella* detection are either rapid tests validated against EU reference method ISO 6759 or the EU reference analytical method ISO 6759.

In case of ready-to-eat products the samples are taken in line with EU requirements.

In all establishments visited water was chlorinated (target 0.5 to 2 ppm) and daily tests on the free residual chlorine content were performed and recorded.

e) **Traceability**

Each establishment implements its own traceability system, which is evaluated by the CA.

The audit team noted that in all the establishments visited traceability systems were in place and records were properly kept.

**Conclusions**

There is a comprehensive system of official controls of poultry establishments which is capable of ensuring compliance with the relevant EU standards. However, deficiencies (mainly regarding potential cross-contamination of products and HACCP issues) found in some establishments demonstrate that its application is not fully effective.

Comprehensive own-check monitoring programmes are implemented by the FBOs in poultry establishments, with some deficiencies regarding sampling and lack of serotyping for *Salmonella enteritidis* (SE) and *Salmonella typhimurium* as food safety criteria.

In addition inadequate responses by CAs in some cases of significant increases in *Salmonella* prevalence at farm and establishment level were noted.

5.3.4 **Official sampling**

**Legal requirements**

The statements contained in section II.1 of the poultry meat certificate included in Commission Regulation (EC) No 798/2008, in particular points (c), (e) and (f), and in sections II.2.6 and II.2.7 of the certificate provided in Commission Decision 2007/777/EC, imply that the CA should take samples for laboratory analysis.

**Findings**

Based on Circular 12/2007/DICAO/CGI/DIPOA an official sampling plan is in place to verify FBO’s own-checks. The official sampling programme includes water sampling in establishments and detection of *Salmonella* as a part of a Pathogen Reduction Programme. SIPOA establishes a sampling timetable. The audit team noted that sampling plans are implemented by the SIFs and the samples are analysed in official laboratories (LANAGRO and accredited by the MAPA) (for more see chapter 5.4). However samples under the Pathogen Reduction Programme are generally analysed in a FBO recognised laboratory and once per week (parallel) in official (LANAGRO or
accredited) laboratories. In one establishment visited the audit team noted significant differences between results from official and in-house laboratories. No action was taken by the CA concerning this issue.

In the establishments visited the results of the official sampling programme were available to the audit team. As regards process hygiene criteria, in all slaughterhouses visited one whole carcass per shift (prescribed frequency) is sent to the laboratory for detection of *Salmonella* as a part of the Pathogen Reduction Programme. One cycle consists of 51 samples and is considered as positives if in more than twelve samples *Salmonella* spp is detected. The CA informed the audit team that isolates of *Salmonella* spp are sent by the laboratory to a specialised official laboratory for serotyping. However results of serotyping are not available to the SIF. The CA explained that the objective of this exercise is not to fulfil requirements of Regulation (EC) No 2073/2005 but to collect epidemiological data as regards the presence of different serotypes.

In some establishments official sampling for microbiological analysis is carried out on poultry meat preparations and/or poultry meat products. The OV regularly verifies the results of FBOs’ own-check analyses by documentary review.

In most establishments visited the audit team noted that the results for microbiology analyses of water, ice and products were compliant. In the case of a positive microbiological/physic-chemical result for product and ice reviewed by the audit team the FBO followed-up the positive result and took corrective actions which were verified by the CA, including intensified sampling of the ice.

**Conclusions**

A comprehensive national monitoring programme of water and poultry meat for microbiology is implemented by the CA in poultry establishments.

### 5.3.5 RASFF

**Legal requirements**

Chapter IV of the Regulation (EC) No 178/2002 creates and establishes rules for the Rapid Alert system; Chapter II of Title VI of Regulation (EC) No 882/2004, on import conditions, indicates how the powers available to the third country, and the regularity and rapidity of the information supplied by the third country concerning hazards will be evaluated by Commission services.

**Findings**

In 2008, the CA had put in place a procedure to be followed in order to investigate the factors that may have given rise to such notifications. These procedures have recently been reviewed (June 2013) in order to speed up the investigations, however the new system is not yet fully operational. Furthermore the CCA informed the audit team on a draft of new instructions and report model for the official evaluation of RASFF investigations.

In the period 2012-2013, the CA followed up 80 RASFF notifications concerning the presence of *Salmonella* in poultry meat and products derived therefrom imported into the EU.

The audit team reviewed some of these RASFF notifications in six establishments visited and in most instances noted an unexplained delay (up to 12 months) in communicating the notifications by the CCA to SIPOA and SIF.

When RASFF alerts were investigated by the Cas, action plans were requested. However the audit team observed in some RASFF alerts reviewed a lack of communication between different CAs involved (CAs responsible for animal health, SIPOA and SIF). In one case reviewed by the audit team, the OV of an establishment was informed of a RASFF event by the FBO. However, the OV
did not inform/pass information to upper levels of the CA. In addition CCA procedures were not always fully followed (although requested by the FVO in some instances no evidence of investigations carried out at farm level and in feed mills was provided).

In general FBO actions to prevent recurrence of RASFF notifications were found adequate but seriously compromised by the delay in taking action.

In three establishments visited the audit team noted that EU exports had recently been officially suspended (after an investigation triggered by several RASFF alerts). In a fourth establishment the FBO voluntarily suspended such exports.

Conclusions
Significant delays in official reaction to RASFF notifications compounded by inadequate communication between different CAs involved in their investigation compromises the effectiveness of the system in place.

5.3.6 Laboratories

Legal requirements
Article 46 of Regulation (EC) No 882/2004 indicates how Commission controls in third countries will have particular regard to the resources available to the CA, including diagnostic facilities. The Codex Alimentarius Guidelines require adequate quality controls and the use of validated analytical methods.

Regulation (EC) No 2073/2005 sets out the EU reference analytical methods for microbiological analyses.

Findings
The National Laboratories Network is composed of six official "LANAGRO" laboratories and others which are accredited or recognised (by the General Coordination for Laboratory Support of MAPA) laboratories. Official samples can be analysed in either an official or a MAPA accredited laboratory. Some of the laboratories that analyse official samples are accredited to ISO 17025 by a state accreditation body or by the federal accreditation body (INMETRO). The CCA informed the audit team that since 2010 all laboratories analysing official samples have begun a new accreditation process with the federal accreditation body which should be completed by June 2014. Although the laboratory visited by the audit team applied for accreditation, there has been no first assessment visit carried out yet by INMETRO. The CCA informed the audit team that accreditation by INMETRO of most of the laboratories analysing official samples in the poultry sector is still pending. Thus the recommendation on this issue from 2011 audit report remains unaddressed.

FBO samples may be analysed in either an official, accredited, or a recognised laboratory.

The audit team visited one accredited (by MAPA) and one official laboratory.

In the accredited laboratory visited both official and FBO samples are analysed. Accreditation was granted by MAPA and by the relevant state accreditation body. The methods used for poultry in the laboratory are within its scope of accreditation. This laboratory is regularly audited by the MAPA and state accreditation body to verify whether the conditions for accreditations are continuously met. A report of the most recent audits was available to the audit team who noted that only minor deficiencies had been detected and those were subsequently remedied by the laboratory staff.

The audit team also visited one official LANAGRO laboratory. Although the laboratory visited is not accredited it follows the procedures laid down in EN/ISO 17025, a quality manual is in place.
and the laboratory regularly carries out internal audits. The audit team noted that the analytical methods used for detection of *Salmonella* and *Listeria monocytogenes* are either ISO or screening methods validated against the ISO method. The audit team noted that laboratory staff in both laboratories visited are knowledgeable in their field.

The accredited laboratory visited regularly participates in ring tests for microbiological parameters (including *Salmonella* and *Listeria monocytogenes*) organised by LANAGRO with a lyophilised sample used as a matrix with satisfactory results. The LANAGRO laboratory regularly participates in proficiency tests organised by other LANAGRO laboratories and in some internationally organised tests with satisfactory results.

**Conclusions**

All laboratories analysing official samples are not yet accredited, even though they had submitted applications for accreditation in 2010 which are still pending.

### 5.3.7 Official certification

**Legal requirements**

Article 9 of the Agreement lays down requirements for certification procedures. Council Directive 96/93/EC lays down EU certification principles. Article 6 of the Directive stipulates that the Commission shall ensure that the rules and principles applied by third-country certifying officers offer guarantees at least equivalent to those laid down in this Directive.


The model certificate for poultry meat is established in Regulation (EC) No 798/2008 and for poultry meat products in Decision 2007/777/EC.

**Findings**

Brazilian certification procedures are laid down in NI No 34/2009/SDA/MAPA.

Export certificates are issued on-line via the SIGSIF system. The FBOs have access to SIGSIF and via SIGSIF make their certification requests to the local SIF. The OV responsible for an establishment checks the data on the certification request against the production records and products in store and their eligibility, including traceability documentation, and prints the certificate if production and documentation is correct. After having checked the consignment, the container and sealing the container, and verifying these against the documentation, the certificate is printed, physically signed and stamped.

In the establishments visited by the audit team the certificates were all issued on special paper with banknote standard security features and serial numbers in order to prevent fraud. The certificates have unique security codes which provide EU border inspection points with a reliable means of verifying the certificates via a website. The supporting documentation for certificates issued for EU exports was also available to the audit team.

**Conclusions**

There is a detailed procedure in place for issuing of EU export health certificates. The system is well organised and implemented and is in line with EU requirements.
6 **Overall Conclusions**

There is a control system in place covering the production chain of poultry meat and poultry meat products intended for export to the EU.

However the effectiveness of the system is compromised by:-

- Significant delays in official reaction to RASFF notifications compounded by inadequate communication between different CAs involved in their investigation.
- HACCP plans which do not appropriately address the *Salmonella* risk (and prevent RASFF notifications).
- Inadequate responses by CAs in cases of significant increases in *Salmonella* prevalence at farm and establishment level.
- Deficiencies in the implementation on Regulation (EC) No 2073/2005 (particularly as regards *Salmonella typhimurium* and *Salmonella enteritidis* as food safety criteria) and in some instances insufficient knowledge of OVs regarding the EU's microbiological requirements.

In addition, the system is undermined and confidence in the CAs involved is diminished by their failure to implement five of eight guarantees provided in response to the recommendations of the previous audit report, namely regarding ante and post-mortem inspections, OV knowledge of EU requirements, de-listing procedures and accreditation of laboratories.

7 **Closing Meeting**

During the closing meeting held in Brasilia on 20/09/2013, the audit team presented the findings and preliminary conclusions of the audit to the CAs.

During this meeting, the CAs acknowledged the findings and preliminary conclusions presented by the audit team. In addition the CCA reiterated their position that they consider their AMI system is equivalent to the system required under EU legislation.

8 **Recommendations**

The CA should provide Commission services with an action plan, including a timetable for its completion, within one month of receipt of the report, in order to address the following recommendations for poultry meat and products derived therefrom exported to the EU.

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<tr>
<td>1.</td>
<td>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).</td>
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<td>2.</td>
<td>The CA should ensure that post-mortem inspection is carried out in accordance with Regulation (EC) No 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).</td>
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<td>3.</td>
<td>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 Salmonella.</td>
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<td>4.</td>
<td>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 therefrom, in line with Article 12 of Regulation (EC) No 854/2004, in particular adequate de-listing procedures should be put in place and implemented.</td>
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<td>5.</td>
<td>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).</td>
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<td>6.</td>
<td>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).</td>
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<td>7.</td>
<td>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.</td>
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<td>8.</td>
<td>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).</td>
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<td>9.</td>
<td>The CCA should ensure that the sampling plan and serotyping for Salmonella enteritidis and Salmonella typhimurium 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.</td>
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<td>10.</td>
<td>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</td>
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The competent authority's response to the recommendations can be found at:

# Annex 1 - Legal References

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<tr>
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