EUROPEAN COMMISSION DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis

DG(SANTE) 2022-7442

FINAL REPORT OF AN AUDIT IN ARGENTINA CARRIED OUT FROM 26 OCTOBER TO 18 NOVEMBER 2022 IN ORDER TO

EVALUATE THE CONTROL SYSTEM IN PLACE GOVERNING THE PRODUCTION OF HORSE MEAT INTENDED FOR EXPORT TO THE EUROPEAN UNION

Executive Summary

The report describes the outcome of an audit in Argentina carried out by Directorate-General for Health and Food Safety from 26 October to 18 November 2022. Its objective was to evaluate whether the official control and certification system over the production of equine meat intended for export to the European Union (EU) provides adequate guarantees that production is in line with the relevant EU requirements and, in particular, is able to support the attestations contained in the relevant EU official health certificate. In this context, the audit also evaluated the effectiveness of the actions announced on foot of the recommendations made in previous audits (2018 and 2020).

The audit found that the official control and certification systems are designed to enable officials endorse the statements contained in the EU official certificate accompanying consignments destined for the EU. Official controls at EU slaughterhouses were, overall, satisfactory and carried out in line with EU requirements. Moreover, some of the measures announced and implemented in response to the previous recommendations have led to improvements in respect of controls in horse assembly centres, recording of veterinary treatments, feedback on welfare issues (from slaughterhouses to the authorities responsible for official controls at primary production level), and post-mortem inspection.

However, the audit also established that the corrective actions implemented did not effectively address previous key shortcomings in respect of horse identification and traceability, and the reliability of the supporting documentation. This significantly compromises the guarantees provided in respect of compliance with EU veterinary medical treatment and residency requirements:

- The equine identification system in place does not allow the traceability of live horses destined for EU slaughter, particularly during the required 180 days of residence before slaughter. It therefore cannot support the required assurances concerning associated veterinary medical treatments. The national rules in place intended to ensure the group identification (hot branding) of equines kept at the holdings are neither implemented as required, nor enforced. The individual identification of equines, only a few days before slaughter, ensures their traceability just during this limited period.
- The guarantees concerning the required residence period and compliance with veterinary treatments are currently based on owners' sworn declarations, which the audit found to be insufficiently reliable and, on some occasions, to be false. In this regard, the system in place does not allow the competent authorities to ascertain the veracity of these declarations. In this regard, the competent authorities do not make use of the capabilities of the otherwise very well-developed holding and stock database (SIGSA) for verification purposes.

Animal welfare at the time of slaughter and killing was found to be in line with EU requirements. In addition, available slaughterhouse data indicate that the welfare conditions for live horses at primary production level, including their transport, has improved since the previous audits. Nonetheless, the audit found that national legislation in this area - notably on transport - is not implemented properly, nor is it enforced effectively. This is evidenced, amongst other examples, by instances of mares foaling in the lairage.

The report contains recommendations to the competent authorities to address the identified shortcomings.

Table of Contents

1	Introduction			
2	Objectives and scope			
3	Legal Basis			
4	Bac	Background		
5	Find	Findings and Conclusions		
	5.1	Legislation and implementing measures	3	
	5.2	Competent authorities	4	
	5.2.	Structure and organisation	4	
	5.2.2	2 Legal powers, independence and authority for enforcement	5	
	5.2.	3 Supervision	5	
	5.3	Registration of holdings and approval of establishments	6	
	5.4 Official controls at primary production level		7	
	5.4.	l Equine database	8	
	5.4.	2 Animal identification	8	
	5.4	Movements of equines destined for EU slaughterhouses	9	
	5.4.	Official controls at holdings keeping equines and at acopios	11	
	5.4.:	Register of veterinary treatments	13	
	5.5	Official controls at establishment level	15	
	5.5.	Ante-mortem inspection	15	
	5.5.	2 Animal welfare at the time of slaughter or killing	16	
	5.5	Post-mortem inspection	17	
	5.5.4	Controls on general requirements applicable to all establishments	17	
	5.5.:	5 Traceability	18	
	5.6	Official certification	19	
6	Ove	rall Conclusions	19	
7	Clos	sing Meeting	20	
8	REC	COMMENDATIONS	21	
Aı	nnex 1	– Legal references		

ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
Acopio	Horse assembly centre
AMI	Ante-mortem inspection
CA(s)	Competent authority/ies
CCA	Central Competent Authority
DG Health and Food Safety	Directorate-General for Health and Food Safety of the European Commission
EC	European Community
Model EQU	Model animal health/official certificates for the entry into the Union of fresh meat intended for human consumption, excluding minced meat and mechanically separated meat, of domestic solipeds (Equus caballus, Equus asinus and their cross-breeds) set out in Chapter 4 of Annex III to Commission Implementing Regulation (EU) 2020/2235
EU	European Union
DNSA	National Directorate for Animal Health (Dirección Nacional de Sanidad Animal)
DJIME	Affidavit of Identification and Mobilization of Equidae (Declaración Jurada de Identificación y Movilización de Équidos)
DTe	Electronic Transit Document (Documento de Tránsito Electrónico)
OA	Official auxiliar
OV	Official veterinarian
PMI	Post-mortem inspection
RCA	Regional competent authorities
RENSPA	National Sanitary Registry of Agricultural Producers (Registro Nacional Sanitario de Productores Agropecuarios)
SENASA	National Service of Food Health and Quality (Servicio Nacional de Sanidad y Calidad Agroalimentaria)
SIGICA	Integrated Food Safety and Quality Management System (Sistema Integrado de Gestión de Inocuidad y Calidad Agroalimentaria)
SIGSA	Integrated Animal Health Management System (Sistema Integrado de Gestión de Sanidad Animal)
SIV	Veterinary Inspection Service (Servicio de Inspección Veterinaria)
The 2018 audit	DG(SANTE) 2018-6459, Final report of an audit carried out in Argentina from 26 November 2018 to 07 December 2018 in order to evaluate the control system in place governing the production of food of animal origin (horse meat) intended for export to the European Union
The 2020 audit	DG(SANTE) 2020-6935, Final report of an audit carried out in Argentina from 26 February 2020 to 10 March 2020 in order to evaluate the control system in place governing the production of bovine and ovine fresh meat intended for export to the European Union
VMP	Veterinary medicinal products

1 Introduction

The audit in Argentina took place from 26 October to 18 November 2022, as part of the planned audit programme of the Directorate-General for Health and Food Safety of the European Commission (DG Health and Food Safety).

The audit team comprised three auditors from the DG Health and Food Safety. The audit team was accompanied during the whole audit by representatives of the National Service of Food Health and Quality (*Servicio Nacional de Sanidad y Calidad Agroalimentaria* - SENASA), the Central Competent Authority (CCA). Representatives of other regional and local authorities, responsible for the implementation of the official controls covered by the scope of the audit, also joined the audit team during the specific meetings and on-the-spot visits.

An opening meeting was held by videoconference on 26 October. At this meeting, the audit team confirmed the objectives and scope of the audit, the planned meetings and itinerary for the audit, and requested additional information for the satisfactory completion of the audit.

2 OBJECTIVES AND SCOPE

The objective of the audit was to evaluate the official control system over the production of horse meat intended for export to the European Union (EU), as well as certification procedures, in order to assess whether the systems in place provide guarantees that the production of this commodity is in line with the requirements laid down in EU legislation and, in particular, are able to support the public health attestations contained in the relevant export health veterinary certificate (model "EQU" laid down in Chapter 4 of Annex III to Commission Implementing Regulation (EU) 2020/2235).

In this context, the audit also evaluated the implementation and effectiveness of the actions taken by the CCA in response to the recommendations made in previous audit reports relevant to the current audit: DG(SANTE) 2018-6459 on horse meat (hereinafter "the 2018 audit") and DG(SANTE) 2020-6935 on bovine and ovine meat (hereinafter "the 2020 audit").

In terms of scope, the audit focused on:

- National legislation/standards applicable to the sector audited;
- The structure and organisation of the competent authorities, the supervision at different levels and authority for enforcement;
- The export certification system; and
- The organisation and implementation of the official control system over the production, processing and distribution chains of horse meat intended to be exported to the EU.

In particular, the audit covered the controls on horse identification, traceability and documentation of veterinary medical treatments, in order to verify, and where necessary, effectively enforce that:

- only meat from horses the residency of which the CA can attest for a minimum of 6 months before slaughter is exported to the EU;
- during this period, animals shall only have been treated with pharmacologically active substances listed in Table 1 of the Annex to Regulation (EU) No 37/2010 and
- the appropriate pre-slaughter withdrawal periods have been complied with;
- in the event that horses have been treated with pharmacologically active substances listed in Regulation (EC) No 1950/2006, a minimum six-month pre-slaughter withdrawal period applies;
- horses have not been treated with substances expressly prohibited or not authorised for use in food-producing animals in the EU.

The table below lists the meetings held and on-the-spot visits carried out in order to achieve the above objective:

COMPETENT AUTHORITY			
Central	2	Opening and closing meetings	
Regional	4	In all establishments and holdings visited	
Local		In all establishments and holdings visited	
FOOD BUSINESS ESTABLISHMENTS			
Slaughterhouses	3		
Cutting plants	3	Integrated with slaughterhouses	
Horse assembly centres ("acopios")	5		
Farms	3		

3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation and, in particular, Article 120 of Regulation (EU) 2017/625 of the European Parliament and of the Council on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products.

Full legal references are provided in Annex 1. Legal acts quoted in this report refer, where applicable, to the last amended version.

4 BACKGROUND

Previous Audits

The main deficiencies identified during the 2018 audit concerned:

- limited controls at horse assembly centres (hereinafter *acopios*), which did not provide guarantees about the traceability of live horses destined for EU slaughter;
- lack of necessary information to support key attestations in the model "EQU" certificate for equine meat; in particular, regarding the recording of veterinary medicinal treatments of the animals ,and compliance with the residency requirements; and
- animal welfare at *acopios*, with controls inadequate to identify and rectify shortcomings.

During the 2020 audit on bovine and ovine meat, in the wider context of the follow-up of the 2018 audit, the audit team visited one *acopio*. The audit report included a recommendation to the CCA to take into account animal welfare issues identified at the EU-listed slaughterhouses, such as dead animals on arrival, in order to take appropriate actions at primary production level and to avoid the recurrence of similar issues.

In response to the 2018 and 2020 audit recommendations, the CCA provided action plans that, based on desk analysis and provided they were implemented as proposed, could address satisfactorily these recommendations. Both reports are published on the Commission's website at: http://ec.europa.eu/food/audits-analysis/audit_reports/index.cfm.

Production and Trade information

The table below reports the information the CCA provided concerning the amount of equine meat exported to the EU (in tonnes) in 2020, 2021 and until October 2022:

Type of product	2020	2021	2022
Equine meat	9 505	10 990	9 494

5 FINDINGS AND CONCLUSIONS

5.1 LEGISLATION AND IMPLEMENTING MEASURES

Legal requirements

Article 120(1)(a) and (2)(a) of Regulation (EU) 2017/625.

Findings

- 1. The national legislation applicable to the production and certification of equine meat to be exported to the EU largely remain the same as described in the 2018 audit report.
- 2. The main legislative changes since the 2018 audit applicable to live equines are:
 - SENASA Resolution No. 893/2018, which established procedural, documentary and technical requirements related to infrastructure, movements and animal identification for provision of Equidae for slaughter, was amended by Resolution 705/2022 in November 2022. The main changes concern the method of individual identification of equines destined for slaughter (see paragraph 30) and the cases where the authorisation of acopios or pre-slaughter holdings must be suspended/withdrawn.
 - SENASA Resolution No 505/2022: in order to improve the control over equines destined for slaughter, operators sending equines to a slaughterhouse or an acopio must notify and register the dispatch in the Integrated Animal Health Management System (Sistema Integrado de Gestión de Sanidad Animal SIGSA database (see paragraph 25) at least 48 hours before loading the animals. The same Resolution

- requires that animals admitted to an *acopio*/pre-slaughter holding must remain there for a minimum period of 5 days before transport to the slaughterhouse.
- SENASA Resolution No 118/2022, as amended, establishes the prohibition of the administration of veterinary products that contain oestradiol and its esters in their formulation to equines. The product labels must indicate that they may not be administered to animals producing food for human consumption to be exported to the EU, and/or to other countries with equivalent requirements.
- SENASA Resolution No 1698/2019 establishes the National Animal Electronic Identification System, including for equines destined for slaughter.
- SENASA Resolution No 1697/2019 establishes minimum requirements related to animal welfare, applicable in the livestock area, in all its stages up to and including slaughter, working animals used in the agricultural holdings, and sport equines.
- *Memorandum No ME-2020-35768738* changed the methodology for controlling the premises authorised as suppliers of horses for slaughter (see paragraph 45).
- 3. While a comprehensive review of the national legislation and implementing measures was not carried out by the audit team, the audit findings indicate that the public health requirements applicable to the production of equine meat destined to the EU is, overall, in line with EU rules.

Conclusions on legislation and implementing measures

- 4. Argentina has introduced several legal acts aimed at improving and reinforcing the official controls at primary production level.
- 5. No changes in the national laws and implementing measures on hygiene and public health applicable to exports of equine meat to the EU have taken place since the 2020 audit. Therefore, these legal provisions remain overall in line with applicable EU requirements and provide an adequate basis for the official controls.

5.2 COMPETENT AUTHORITIES

Legal requirements

Article 120(2) (b) of Regulation (EU) 2017/625.

Findings

- 5.2.1 Structure and organisation
- 6. The structure and organisation of the CAs has seen some changes since the 2020 audit:
 - a. since August 2022, SENASA is under the Secretary of Agriculture, Livestock and Fisheries which, in turn, is under the Ministry of Economy;
 - b. there are now 14 regional SENASA centres; and

- c. The National Directorate of Veterinary Products is currently the Directorate of Veterinary Products, under the National Directorate for Animal Health (DNSA).
- 7. SENASA continues to be the CCA responsible for executing the national policies regarding animal health and food safety. Two out of its four national Directorates are still relevant in the context of the current audit: the DNSA, and the National Directorate for Food Safety and Quality (*Dirección Nacional de Inocuidad y Calidad Agroalimentaria*).
- 8. SENASA's has a three-level structure: central level (the CCA), regional level (RCA) and the local level and its authorities (CAs). At each level, separate sectors are responsible for animal health and public health.
- 9. The operative functions (qualifications, inspection and control, supervision and certification) are carried out by the 14 regional centres, distributed throughout the country and coordinated by the National Directorate of Operations.
- 10. Local offices are responsible for the implementation of the rules and procedures issued by the CCA and RCA, through the local official veterinarians (OV). The official activities at establishment level are carried out by the Veterinary Inspection Service (*Servicio de Inspeccion veterinaria* SIV). The teams usually comprise one Principal OV (*Jefe de Servicio*), who is responsible for the coordination of the team, several other OVs and a number of official auxiliaries (OAs).

5.2.2 Legal powers, independence and authority for enforcement

11. No significant changes have taken place since the 2020 audit. The national legislation provides the different levels of the official staff with the necessary powers to carry out the necessary official controls, the authority to enforce the relevant requirements, and guarantees concerning their independence and absence of conflict of interest.

5.2.3 Supervision

- 12. Since the 2020 audit, no changes have occurred in the supervision system over the activities performed by the OVs at local level:
 - a. Regarding animal health, regional supervisors are responsible for the organisation and control of the activities carried out by the local offices. The CCA noted that there is no specific system for supervising the performance of the local OVs responsible for controls at holdings and *acopios*. These activities are covered within the general control of local office operations.
 - b. In the establishments, information provided by the CCA showed that during the monthly supervision by RCAs at EU-approved horse slaughterhouses, 8 non-conformities related to the performance of the SVI were found in 2021 and 2022 (October). Aside from one case (the heads not correlating with carcases for *post-mortem* inspection), the issues noted were not serious.

13. Regional supervisors periodically supervise the SIV activities; the supervision reports are loaded into an Integrated Food Safety and Quality Management System (*Sistema Integrado de Gestión de Inocuidad y Calidad Agroalimentaria* - SIGICA). The audit team saw evidence of these supervision activities, and the follow up of issues identified.

Conclusions on competent authorities

- 14. The CAs responsible for the official control system over the production of this commodity are clearly designated and their structure and organisation are adequate for the performance of their tasks.
- 15. Officials have the authority to visit and control establishments, and to take enforcement actions to address identified non-compliances. Adequate measures are in place to ensure their independence and to avoid conflict of interest.
- 16. Supervisory mechanisms over the control activities carried out by official staff are in place, with corrective action being taken in the case of identified shortcomings.

5.3 REGISTRATION OF HOLDINGS AND APPROVAL OF ESTABLISHMENTS

Legal requirements

Article 5 of Commission Delegated Regulation (EU) 2019/625 (¹) and Article 10 of Regulation (EC) No 852/2004 of the European Parliament and of the Council.

Findings

Registration/authorisation of holdings supplying equines to EU-slaughterhouses

- 17. As during the 2018 audit, all holdings keeping equines must be registered in the National Sanitary Registry of Agricultural Producers (*Registro Nacional Sanitario de Productores Agropecuarios* RENSPA) and a unique number RENSPA is allocated.
 - Acopios and horses' pre-slaughter holdings supplying equines to EU slaughterhouses
 must meet the documentary, technical and infrastructural requirements of Resolution
 No 893/2018, and obtain official authorisation. This Resolution provides that these
 premises must have, inter alia, sheltered pens and shaded spaces of sufficient
 dimension for all animals to access; drinkers and feeders in good condition,
 constructed so as to prevent them causing injury and of adequate size, so that all
 animals have easy access to water and food, avoiding competition between them.
 - The authorisation is granted once all the requirements have been fulfilled and the producer agrees to comply with the requirements applicable to equines for slaughter, including those related to the administration of veterinary medicinal products.

⁽¹⁾ This Regulation was repealed and replaced by Commission Delegated Regulation (EU) 2022/2292 from 15 December 2022.

- The authorisation of *acopios* or horse pre-slaughter holdings can be suspended/withdrawn when it is established that the authorisation was granted based on false information or documentation, or as a sanction for non-compliance with Resolution's provisions. Examples were provided during the audit (see paragraph 48).
- 18. The information provided by CCA shows that in 2022, 127 537 holdings and 124 *acopios* were authorised for supplying equines to the slaughterhouses. No horse pre-slaughter holdings are registered/authorised under this category.
- 19. During the visit to two recently approved *acopios*, the audit team noted that: In one, the shaded area was insufficient for the numbers of horses kept at the premises. In the other *acopio*, the OV granted the authorisation without any shaded area. The CA and the operator stated that newly planted trees will provide shade in the future.

Approval of establishments

- 20. The EU-approval and listing procedures for establishments are described in the 2020 audit report.
- 21. As in 2020, at the time of this audit there were four EU-listed horse slaughterhouses.
- 22. All four establishments have been re-evaluated in 2022 by the CA. The audit team noted that all establishments, except for the cold storage and expedition area of one slaughterhouse, met EU structural and hygiene requirements. The operational hygiene was overall satisfactory in the three establishments visited.
- 23. The provisions in place establish that after 2 years without exports to the authorised market the establishment must be de-listed, unless an audit by the CA establishes that the requirements for export to the market continue to be met.

Conclusion on registration of holdings and approval of establishments

24. Procedures are in place for the approval/suspension/withdrawal of holdings and of food business establishments, which allow the CA to maintain oversight and to take appropriate actions when the conditions are no longer met. However, the procedures for the authorisation of *acopios* are not consistently implemented as required, impacting on the welfare of the horses kept.

5.4 OFFICIAL CONTROLS AT PRIMARY PRODUCTION LEVEL

Legal requirements

Article 120(1)(b) and (2)(e) and (h) of Regulation (EU) 2017/625.

Article 10 of Regulation (EC) No 852/2004.

Point II.1.7 of the model 'EQU', animal health/official certificate for the entry into the Union of fresh meat intended for human consumption of domestic solipeds laid down in Chapter 4 of Annex III to Regulation (EU) 2020/2235.

Findings

5.4.1 Equine database

- 25. SENASA has a centralized database system, SIGSA, in which relevant information concerning premises at primary production level, identified with a unique RENSPA, must be registered. This includes the stock of equines kept in the holdings and *acopios*, by category of animals (e.g. mares, stallions, geldings, foals, etc.), the movements in and out of the premises, and the details of the ear-tags acquired.
- 26. SIGSA allows the operators of the premises to introduce, directly on-line, any information related to their activities (e.g. the mandatory annual owner's declarations regarding the number and category of animals kept; events such as births/deaths and movements that may take place during the year); as well as the issuance of documents required for the movement of animals (see section 5.4.3).
- 27. The CCA provided the audit team with comprehensive and detailed information obtained from SIGSA. The system is very sophisticated and allows the CAs to extract relevant data that could be used for the organisation of official controls (e.g. premises where the residency period of equines is lower than 180 days) as well as for the verification of the reliability of owners' declarations. The audit team noted that on occasion, the information extracted from SIGSA is used for planning the controls (e.g. the identification of operators that move the largest number of animals, targeted controls on operators with recurrent animal welfare issues).

5.4.2 Animal identification

- 28. National legislation does not require the individual identification of equines present on holdings. Instead, the owners of equines must hot-brand the animals with a single registered mark at the holding of birth, before 1 year of age (group traceability). The marks certify the ownership of the animals and must be registered by the provinces.
- 29. The CCA stated that is no longer required to hot-brand animals with the letter "F" ("Faena" i.e. "Slaughter", identifying the horse as solely destined to slaughter) when they arrive at the *acopios*. Nonetheless, this mark was still in use in one *acopio* visited.
- 30. Equines (EU or non-EU eligible) destined for slaughter must be identified with a radio-frequency identification ear-tag before leaving the holding of origin. Animals can go directly to the slaughterhouse, or pass through an *acopio*, the latter being the most common. The CCA stated that from 1 March 2023, the equines going to slaughter must be identified with a microchip before the animals leave the holding of origin.

31. In Argentina, equines are not considered food-producing animals and there are no holdings keeping horses specifically for meat production. The owners' decision to send a horse for meat production, and therefore the obligation to apply the ear-tag, is usually taken a few days before sending the animal to the *acopio*/slaughterhouse. The owner of one *acopio* visited stated that when horses arrive, it is usually because they have some problem, (e.g. the horse is not fit for the intended purpose, the animal is at the end of its working life, surplus of animals).

32. The audit team noted that:

- a. horses were rarely hot branded at the holding of origin. At the holdings, *acopios* and slaughterhouses visited, most horses did not have the hot brand. Some of the operators met acknowledged that sometimes owners do not mark the animals because this makes subsequent sales difficult, or for animal welfare reasons, etc.
- b. some animals sent to the *acopio*/slaughterhouse left the holding of origin without ear-tags. The CCA provided the audit team with the outcome of police road controls on animal transports, which found that some of the equines left their holdings of origin without ear-tags. Moreover, some operators visited explained that sometimes there is a lack of facilities to tag horses, and that the *acopios* owners do this work as they have more experience.
- 33. The CCA stated that SENASA recently endorsed a collaboration project with the meat industry ("Reality System", *Sistema Realidad*) designed for the electronic and digital individual identification, geo-referenced, of rural horses with a microchip and to be recorded in SIGSA. This system will allow the control of stocks, movements and traceability. The audit team visited two holdings that, as part of a pilot project, had microchipped their horses. Owners met were very positive of the system, mainly because it was easy to implement and improved the welfare of the animals. However, at the time of the audit it was neither clear when the system would be fully operational nor what part of the horse's lifespan would be covered by the identification.

5.4.3 Movements of equines destined for EU slaughterhouses

- 34. When holdings of origin send equines to an *acopio* or directly to the slaughterhouse, and when animals go from the *acopio* to the slaughterhouse, owners must ensure that the following documents accompany the transport of the animals:
 - a. a transfer document (Electronic Transit Document *Documento de Tránsito Electrónico* "DTe"), containing movement information. In this document the owners must declare, amongst others, the quantity of animals moved, by category, origin/destination data, type of origin (holding or *acopio*), type of destination (*acopio* or slaughterhouse), date of loading of the animals, and the haulier.
 - b. a sworn statement (Affidavit of Identification and Mobilization of Equidae *Declaración Jurada de Identificación y Movilización de Équidos* "DJIME") that acts as the EU food chain information. In this document the owners must indicate the origin of the animals, their individual identification (i.e. list of the ear-tag

numbers), the animal category, the breed or type, their age, if they were born in Argentina or not, if they have been treated with authorised veterinary medicinal products (VMPs) in the last 180 days or not, and a formal statement declaring their EU eligibility for slaughter or not. In case VMPs have been administrated, treatment details must be specified (i.e. product used, active ingredient(s), series/lot, administration date and withdrawal date).

- 35. The DTe and DJIME are linked (each of them includes, respectively, the number associated with the DJIME/DTe) and must be registered in SIGSA. The responsibility for signing these documents and attesting the veracity of their content lies with the owner/authorised person responsible for the holding/acopio.
- 36. The CAs explained that equines can be certified as EU-eligible only if the person responsible for the holding of origin declares that they were born in Argentina and were kept in the holding for at least 180 days. In addition, they must declare that the horses either have not been treated with VMPs during that period or, in case of treatment, that only authorised drugs have been administered and the withdrawal period has been respected. In order to declare that this is the case, the owners must have registered in SIGSA a sufficient stock of equines, by category, for at least 180 days before loading the animals, and have the book of VMP treatments and sufficient numbers of ear-tags in stock for the identification of the animals. If the owner declares that the equines do not meet one of the above requirements, the animals are disqualified from EU-slaughter.
- 37. The CCA noted that the declarations contained in the DJIMEs signed by the owner of the holding of origin (e.g. the animal is not EU-eligible for slaughter) cannot be changed at a later stage and, therefore, they must match with the declarations the *acopio*'s owner provides in the DJIME accompanying the equines from the *acopio* to the slaughterhouse (see paragraph 34).
- 38. The owners can obtain the DTe and DJIME by going personally to one of the 380 local SENASA offices in the country, or directly on-line (producer's self-management in SIGSA), without the intervention of the CAs. When using SIGSA, the system automatically notifies the SENASA local office of destination of the animals, about the movement.
- 39. EU and non-EU eligible equines can be transported together to the *acopio*/slaughterhouse. If this is the case, the DJIME related to the movement, which must include the list of eartag numbers, must specify which animals are EU-eligible and which ones are not. Since June 2022, a single DTe/DJIME cannot cover EU eligible and non-eligible horses. This should facilitate the segregation of the animals at the *acopios*/slaughterhouses.
- 40. The audit team, with the support of the CCA, obtained evidence that some owners, particularly the ones related to the two largest suppliers of equines in the country, made untrue sworn statements: Although they declared that the equines had been kept at the holdings for 180 days before slaughter, the information in SIGSA established that there was no or insufficient stock at the time the declarations were made. In one case, an owner

issued a DJIME declaring that 5 mares were EU-eligible for slaughter (i.e. kept at the holding for at least 180 days) but the information registered in SIGSA showed that the owner did not have any stock at the holding the day before the declaration. Moreover, the SIGSA data indicated that the same day the DJIME was signed, the owner registered in the system the arrival to the holding of 5 mares, the birth of 5 foals and the exit of the 5 mares as EU-eligible animals for slaughter.

41. In relation to the above issues:

- a. The CCA explained that when owners use the self-management system for issuing the documents from SIGSA directly, the database checks the stock of animals on the day they issue the document, rather than the stock present at the premises 6 months before the declaration.
- b. The audit team noted that in some cases, the local office staff validated declarations that did not correspond to reality (e.g. absence of adequate stock in the previous 180 days before the issuance of the DTe/DJIME), even when documentation was handled through them.
- 42. In response to the above findings, the CCA disabled the possibility for the owners to issue the documentation directly through SIGSA and requested the officials at the local offices to verify that enough stock was present in the holding 180 days before the declaration date, prior to issuing the DTe and the DJIME.
- 43. The audit team noted that physical inspection of equines to be sent to slaughter is currently not required. This should change with the entry into force of Resolution 505/2022, which requires SENASA staff to carry out random inspections. Nonetheless, the inspectors will still have to deal with the implementation issues in respect of the individual identification noted in paragraph 32 above, together with the ambiguous breed/type information reported in the DJIMEs (e.g. half-blood, criollo breed). These issues prevent the CAs from verifying whether all the animals declared as EU-eligible were kept at the holding for at least 180 days, or whether they form part of a consignment of horses that may have arrived at the holding shortly before the issuance of the DJIME.

5.4.4 Official controls at holdings keeping equines and at acopios

44. The official control system requires the annual inspection of all *acopios* and holdings of origin that send equines directly to the slaughterhouse, in order to verify compliance regarding identification, traceability, animal welfare, movements and VMP treatment records requirements. The CCA explained that according to the new Resolution 505/2022, controls at holdings sending horses through *acopios* - to verify the state of health, animal welfare and the correct application of animal identification - will be mandatory from November 2022. The selection of holdings to be checked will take into account risk factors (e.g. number of animals moved the previous year, compliance history).

- 45. The new inspection methodology at the *acopios*, announced in response to the recommendation (2) of the 2020 audit report, is implemented since 2020. It requires the inspection, at least three times per year, of the 15 *acopios* that sent the largest number of equines to slaughter during the preceding year (which represent 66% of shipments to slaughter). Most of the remaining *acopios*, which provide average numbers of animals, , must be controlled twice a year. The small number of remaining *acopios*, which supply the lowest number of animals (some 0.2% of shipments), must be inspected once a year.
- 46. When two or more inspections must be carried out, officials from different levels/jurisdictions are involved: The OV of the jurisdiction of the *acopio* or holding of origin carries the first visit; the regional supervisor from the same jurisdiction carries out the second inspection, regardless of the results obtained during the first control (compliant or non-compliant); and a regional supervisor from another jurisdiction of the same- or from another region, performs the third inspection. Collaboration/participation of DNSA officials may be requested.
- 47. A specific checklist covering documentation, records of VMP use, ear-tag purchase and application, state of facilities, identification and welfare requirements, must be used.
- 48. The CCA provided details of the inspections carried out in holdings and *acopios* during 2021 and 2022, including a summary of the main deficiencies found:
 - a. Concerning holdings, 11 inspections were carried out in 2021 and 20 in 2022. No deficiencies were detected;
 - b. in 2021, 98 *acopios* out of the 138 registered were inspected (a total of 167 controls were carried out); 13 of the inspected *acopios* ceased activities and sanctions were imposed. In 2022, 85 out of the 124 *acopios* registered were inspected (175 controls); 15 ceased activities, and were sanctioned. 34% and 28.5 % of the *acopios* inspected in 2021 and 2022 respectively, had facility conditions between fair to good. Some of the problems identified were due to lack of shade or protection against inclement weather, bad floor conditions, insufficient feed/water supply, and inconsistencies between the stock registered in SIGSA and the number of animals present during the inspection.
- 49. In relation to the recommendation of the 2020 audit report (see footnote (2)) the audit team obtained evidence that the announced measure to give access to the *ante-mortem*

⁽²⁾ The CCA should provide guarantees that the animal welfare of horses destined for EU slaughterhouses is not compromised. In particular, it should ensure that:

a) when animal welfare issues are detected during the AMI at the arrival of horses at EU-slaughterhouses, this information is made available to and used by the CAs responsible for controls at facilities supplying horses to the EU establishments, in line with Article 39(2)(b) of Regulation (EU) 2019/627 and in order to allow measures aimed at preventing their recurrence and to ensure that that EU animal welfare standards are met:

b) the organisation and regularity of supervisory controls takes account of both the above information, as well as the animal movements through acopios; and

c) that animal welfare at primary production level is addressed, as committed during the audit and at the final meeting.

inspection (AMI) findings at the slaughterhouses to the OVs responsible for controls at holdings and *acopios*, has been implemented. However, the audit team noted some inconsistencies between the data registered in SIGICA and in SIGSA, the number of incidents registered in SIGICA being higher than in SIGSA, for all categories of incidents.

- 50. The CCA investigated the reasons for these discrepancies and identified that when more than one welfare issue was detected at the slaughterhouse on the same day, only the first case recorded in SIGICA was communicated to SIGSA. The CCA stated that they would make the necessary changes to the database to swiftly resolve this reporting discrepancy.
- 51. During the visits to the *acopios*, the audit team noted that the controls have improved since the 2018 and 2020 audits. They now take into account welfare issues detected at slaughterhouse level and were able to identify and correct deficiencies found.
- 52. The CCA explained that the first time the slaughterhouses register an animal welfare incident in SIGICA, and it is then transmitted to SIGSA, the operator responsible for the *acopio* or the holding of origin responsible for the consignment of the animals to the slaughterhouse receives a *notification* report. In case of subsequent incidents related to the same operator, an *infraction* report must be issued. The CCA provided data on the reports issued: 32 and 6 notification reports and 22 and 7 infraction reports were issued in 2021 and 2022, respectively, following AMI findings registered at slaughterhouses.
- 53. Concerning controls at the *acopios*, the audit team found situations that were in breach of national legislation (Resolution 1697/2019 and Resolution 893/2018). In some cases, the findings indicated that animals were transported to, or could be transported from, *acopios* in conditions contrary to the national requirements:
 - a. In some *acopios* the shaded/protected areas were insufficient for the number of animals the premises could keep;
 - b. in one *acopio*, a mare with severe chronic laminitis and another one with metritis, were identified that required veterinary care. The responsible CAs stated that, as the animals were moving independently, they were fit for transport;
 - c. information from SIGSA showed that 49 foals were born in 2022 (94 in 2021) and 54 animals died in 2022 (92 in 2021) at the *acopios*. It must be noted that the animals are usually kept at these premises for only a few days before being sent to the slaughterhouses, and that the national legislation mentioned above prohibits the transport of mares exceeding 90% of the gestation period.

5.4.5 Register of veterinary treatments

- 54. Resolutions Nos 666/2011 and 893/2018 oblige the holdings of origin and the *acopios* to maintain, and keep up-to-date, a book of VMP treatments.
- 55. During the visits to holdings and *acopios*, the audit team found that all the premises had the VMP treatment book. The CCA explained that SENASA had distributed the book to the holdings/*acopios* and added that when owners wish to issue a DTe, SIGSA automatically verifies whether they have the VMP treatments book. If not, the DTe cannot

- be issued. Therefore, the actions the CCA provided in response to a recommendation contained in the 2018 audit report have been implemented.
- 56. In all but one of the holdings and *acopios* visited, VMP treatments were recorded. In this holding, the owner explained that he de-wormed the animals three times a year but did not think that these treatments should be recorded. To note that the antiparasitic treatment used requires a withdrawal period of 45 days. The CAs acknowledged that they are aware that it is common practice in some areas of the country but during the controls they do not verify whether these treatments are recorded in the VMP treatment book.
- 57. The CCA explained that the information on VMP treatments reported in the DJIME must correspond with the information recorded in the book of VMP treatments of the holding of origin of the equine or of the *acopio*. However, it was also explained that it is the responsibility of the owners to declare the truth since:
 - a. When the DJIME is processed directly by the owners in SIGSA, it is not possible to verify whether there are treatments recorded in the book; and,
 - b. when the DJIME is issued through the local offices, the system does not require the owners to submit the VMP treatment book to the official in order to confirm the veracity of the owner's declaration.
- 58. In some of the holdings/*acopios* visited, the owners had a medicinal product "curabichera" to be used topically in order to prevent infestations and infection of wounds and to improve cicatrisation. In one *acopio* the audit team noted that the product specified that it should not be used in equines destined for human consumption. Neither the owner of the animals nor the CA responsible for the controls at this *acopio* had noted this.

Conclusions on official controls at primary production level

- 59. The competent authorities avail of a sophisticated and potentially very useful database that allows them to have an accurate and detailed overview, practically in real time, of the situation on premises at primary production level, and to extract very relevant data that is occasionally used for the organisation//planning of official controls and for the verification of the reliability of owners' declarations. Nonetheless, key information in the database is not being used in the organisation of the controls supporting the certification of horse meat to the EU.
- 60. The traceability of horses intended for EU slaughter is not reliable because the equine identification system in place does not provide assurances in respect of the attestations contained in points II.1.4 and II.1.7 in the EU "EQU" model official certificate in respect of VMP treatment and residency requirements.
- 61. The guarantees provided by the sworn statements, in which the operators declare that the equines meet the 180-day residency requirement and comply with the EU requirements concerning VMP treatment, are not reliable. Moreover, the control system in place does not allow the CAs to verify the reliability of the sworn statements.

- 62. The new individual identification system of *equidae* intended for slaughter by means of a microchip, to be implemented from March 2023, is positive from an animal welfare point of view. However, it will not address the current problems regarding the traceability of the equines and the reliability of the 180-day residency period, since it would continue to be applied only a limited number of days prior to slaughter.
- 63. The official controls at holding/*acopio* level have improved and intensified and the actions announced in response to the previous recommendations in this respect have been implemented. Although the data obtained in relation to animal welfare issues noted at these premises show an improvement, the audit findings indicate that the national legislation in this area is still not being implemented properly.
- 64. The control system over the administration and registration of VMP treatments of horses intended for EU slaughter does not allow the CAs to ascertain the reliability of the owners' declarations; moreover, shortcomings were noted in its implementation which, in turn, compromises the guarantees provided in point II.1.7 of the EU "EQU" model official certificate for imports of horse meat to the EU.

5.5 OFFICIAL CONTROLS AT ESTABLISHMENT LEVEL

Legal requirements

Article 120(1)(b) and (2)(e), (g) and (h) of Regulation (EU) 2017/625.

Article 5 of Regulation (EU) 2019/625 (3) and Article 10 of Regulation (EC) No 852/2004.

Points II.1 and II.2 of the model 'EQU', animal health/official certificate for the entry into the Union of fresh meat intended for human consumption of domestic solipeds (*Equus caballus*, *Equus asinus* and their cross-breeds) laid down in Chapter 4 of Annex III to Regulation (EU) 2020/2235.

Findings

- 5.5.1 Ante-mortem inspection
- 65. Circular 4361/2019 that complements Regulation 4238/68, establishes the organisation of official controls. The responsibilities for AMI and post-mortem inspection (PMI) are established in line with the requirements of Commission Delegated Regulation (EU) 2019/624. The AMI must be carried out within 24 hours of the arrival of the horses and within 24 hours before slaughter.
- 66. AMI was carried out by the SIV, in line with the above requirements.

⁽³⁾ See footnote (1)

- 67. The relevant food chain information documentation (DJIME) was also verified as part of the AMI. Based on this information EU eligible and non-EU eligible horses were segregated for slaughter.
- 68. In all slaughterhouses visited, AMI records were kept and, where reviewed, found to be satisfactory. The presence of white or grey horses was noted and they were identified along the slaughter-line to ensure the performance of additional PMI.
- 69. The identification of horses with the individual ear-tag was verified (electronically) by the food business operator at arrival and immediately before slaughter. According to Circular 4369/2022 the CA must ensure that horses missing their individual identification at any stage are excluded from EU production. In addition, the Circular requires that any group of horses in which more than 10 % of horses are without individual identification must be excluded from EU production in its entirety. Contrary to the Circular requirements, in two of the three slaughterhouses visited, horses without individual identification in the second reading were not excluded from EU production. In addition, in one of those two slaughterhouses, the audit team noted that the official controls did not ensure that a group of horses in which more than 10 % of horses were not individually identified was excluded in its totality from EU production. The obligation, from March 2023, to identify horses to be supplied to an *acopio* with a subcutaneous microchip (see paragraph 30) should address these issues.
- 70. The above Circular also requires the CA to control the hot-branding before slaughter. The audit team noted that the officials did not systematically verify that the horses had the hot brand and that most horses slaughtered during the visits were accepted despite not bearing the holding(s) of origin mark.
- 5.5.2 Animal welfare at the time of slaughter or killing
- 71. Circular 4301 A establishes the animal welfare controls and checklist to be used and requires the verification of compliance with the applicable requirements of Regulation (EC) No 1099/2009.
- 72. The audit team noted that the official controls were carried out as planned. Corrective actions were required for identified non-conformities, and these were followed up. The main group of non-conformities identified in 2021 and 2022 related to the lairage pens and concerned issues such as roofing, and general condition of the pens.
- 73. In all slaughterhouses visited, the handling, restraint and stunning of horses was carried out correctly. Back-up stunning equipment was readily available. Bleeding, in the cases observed by the audit team, took place within 1 minute of stunning.
- 74. In one slaughterhouse, the audit team witnessed the unloading of one batch of horses, which was carried out satisfactorily. In the three slaughterhouses visited feed and clean water were available and the horses present were in good condition. However, in one slaughterhouse, the roofing area in the holding pens was insufficient for the maximum capacity permitted. In another slaughterhouse, the feed was placed directly on the mucky

floor. Although most of the feed available was of acceptable quality, some hay bales were mouldy. These issues were not noted by the CA. The operator of this establishment stated that the roofs of the holding pens had been recently replaced (tarpaulin) but they were damaged by a storm.

- 75. In all slaughterhouses, the maximum capacity of the pens was indicated and was respected in the cases seen by the audit team.
- 76. National legislation requires that before loading, animals must be assessed for their fitness for transport, and mares in foal exceeding 90% of the gestation may not be transported. Nonetheless, these requirements were breached as, according to data provided by the CA, during 2022, ten mares foaled in the slaughterhouse's lairages. Eight births took place in a single slaughterhouse. In this slaughterhouse, visited by the audit team, the CA said that the foals were euthanised humanely. The CCA was not aware of these cases.
- 77. While SIGICA caters for recording incidents such as deaths and fallen animals during transport, it does not cater for recording births at the slaughterhouse. Therefore, this information is not available for the performance of official controls to ensure that the national requirements on this point are adhered to by the holdings of origin/acopios supplying equines and/or hauliers involved. The mismatch between SIGICA and SIGCA data on fallen/death horses on arrival was already mentioned (paragraphs 49 and 50).

5.5.3 Post-mortem inspection

- 78. The PMI was carried out by the OA, under the supervision of the OV and in line with EU requirements. Grey horses were correctly examined for melanosis and *melanomata*. Horses' heads were split lengthways for the examination of glanders.
- 79. The OAs take masseter or tongue samples for *Trichinella* testing. The CA Laboratory Service carries out annual audits of the laboratory. Proficiency tests also take place annually, or when new laboratory personnel are trained for the performance of the test.
- 80. The PMI records reviewed documented condemnations, including cases of melanosis. No *Trichinella*-positive cases were detected.
- 81. The CA stated that there are enough OAs to carry out the PMI duties, which the audit team confirmed. Therefore, recommendation number 4 of the 2018 audit report has been effectively addressed.
- 5.5.4 Controls on general requirements applicable to all establishments
- 82. The CA's procedures for official controls, including supervision, over general and specific requirements applicable in establishments are described in detail in the 2020 audit report.
- 83. The SIGICA database keeps comprehensive information related to the performance, outcome and follow up of the official controls.

- 84. The official controls carried out by the OVs followed the procedures and the supervisory audits were carried out at the prescribed frequencies.
- 85. The official controls over pre- and operational hygiene were satisfactory. Carcase dressing was satisfactory, and the audit team did not observe visible carcase contamination.
- 86. In one slaughterhouse visited the operator used lactic acid for decontamination of carcases. Decree 4238/68 allows the use of diluted organic acids for all species in contrast to Commission Regulation (EU) No 101/2013 which only allows the use of lactic acid in domestic bovine carcases. The CA immediately stopped the practice in this premises and formally notified the other EU-listed plants of the applicable EU requirements.
- 87. The establishments' structures were, overall, satisfactory except for the storage and loading area in one establishment. The CA had noted these issues but not taken action as other projects had been prioritised. It committed to pursue the upgrading of these areas.
- 88. One slaughterhouse which during the 2018 audit presented several structural issues had undergone, under CA supervision, major upgrade works that resolved these issues.

5.5.5 Traceability

- 89. Circular No 3958A of 2019 determines that all authorised establishment operators must design and implement a documentary/recording system which allows trace-back of their products, and to have traceability/recovery procedures for the products. It also charges SIV with verifying compliance with the establishment's traceability procedure, and to carry out monthly traceability exercises and an annual recovery drill. The audit team saw evidence that the SIV had performed these activities, and the outcome was always satisfactory.
- 90. The audit team carried out satisfactory traceability exercises, in particular concerning the segregation of EU and non-EU eligible horse meat based on the DJIME.

Conclusions on official controls at establishments' level

- 91. AMI and PMI are carried out in accordance with relevant EU requirements.
- 92. Animal welfare controls were, in general, carried out satisfactorily. Nonetheless, several shortcomings related to the shelter and available feed were identified.
- 93. The Argentinian requirements concerning the fitness for transport of in-foal mares were breached. The absence of reporting such cases, together with inaccurate reporting of numbers of deaths/fallen at slaughterhouses, hampers the implementation of official controls and thus the effective enforcement of the national legislation for transport.
- 94. The official controls over pre- and operational hygiene were satisfactory, with one exception which the CA addressed immediately.

- 95. The control of structural requirements was satisfactory, except for certain areas in one slaughterhouse, which the CA committed to address.
- 96. At establishment level, systems are in place to ensure traceability of horse meat destined to the EU market and these are properly implemented and controlled.

5.6 OFFICIAL CERTIFICATION

Legal requirements

Articles 88 and 89 of Regulation (EU) 2017/625.

Articles 4(2), (3) and (4), 5, 6, and 8 of Regulation (EU) 2020/2235.

Findings

- 97. The legislation and procedures for the issuance of EU health certificates are described in the 2020 audit report.
- 98. At the slaughterhouses visited the audit team observed that:
 - a. The model "EQU" import certificate set out in Regulation (EU) 2235/2020 is used;
 - b. the SIV at establishments take account of the statements of the "EQU" certificate when issuing the provisional health certificate for export of EU consignments; and
 - c. the certification procedure was properly implemented and all supporting documents needed for the issuance of the final health certificate for export were available.

Conclusion on official certification system

99. The certification system and procedures in place are in line with the EU certification principles, and properly implemented. The system, as such, is designed to provide assurances that officials are in a position to attest to the statements contained in the EU "EQU" model official certificate for consignments destined for the EU market. However, the issues identified "upstream" (residence requirements, traceability, use of VMP) call the reliability of the attestations into serious question.

6 OVERALL CONCLUSIONS

The audit found that the official control and certification systems are designed to enable officials endorse the statements contained in the EU official certificate accompanying consignments destined for the EU. Official controls at EU slaughterhouses were, overall, satisfactory and carried out in line with EU requirements. Moreover, some of the measures announced and implemented in response to the previous recommendations have led to improvements in respect of controls in horse assembly centres, recording of veterinary

treatments, feedback on welfare issues (from slaughterhouses to the authorities responsible for official controls at primary production level), and PMI.

However, the audit also established that the corrective actions implemented did not effectively address previous key shortcomings in respect of horse identification and traceability, and the reliability of the supporting documentation. This significantly compromises the guarantees provided in respect of compliance with EU veterinary medical treatment and residency requirements:

- The equine identification system in place does not allow the traceability of live horses destined for EU slaughter, particularly during the required 180 days of residence before slaughter. It therefore cannot support the required assurances concerning associated veterinary medical treatments. The national rules in place intended to ensure the group identification (hot branding) of equines kept at the holdings are neither implemented as required, nor enforced. The individual identification of equines, only a few days before slaughter, ensures their traceability just during this limited period.
- The guarantees concerning the required residence period and compliance with veterinary treatments are currently based on owners' sworn declarations, which the audit found to be insufficiently reliable and, on some occasions, to be false. In this regard, the system in place does not allow the CAs to ascertain the veracity of these declarations. In this regard, the CAs do not make use of the capabilities of the otherwise very well-developed holding and stock database (SIGSA) for verification purposes.

Animal welfare at the time of slaughter and killing was found to be in line with EU requirements. In addition, available slaughterhouse data indicate that the welfare conditions for live horses at primary production level, including their transport, has improved since the previous audits. Nonetheless, the audit found that national legislation in this area - notably on transport - is not implemented properly, nor is it enforced effectively. This is evidenced, amongst other examples, by instances of mares foaling in the lairage.

7 CLOSING MEETING

A closing meeting was held on 18 November with the CCA. At this meeting, the audit team presented the main findings and preliminary conclusions of the audit and informed the CCA of the relevant time limits for the production of the report and their response.

The representatives of the CCA acknowledged the findings and conclusions presented by the audit team. The CCA referred to the "Reality System" and stated to have signed a memorandum of understanding with the meat industry for its implementation, and which it envisages will take one year. The identification of the horses will be registered in the database.

8 RECOMMENDATIONS

An action plan describing the actions taken or planned in response to the recommendations of this report and setting out a time-table to correct the deficiencies found should be presented to the Commission.

No.	Recommendation
1.	The central competent authority should ensure that a reliable identification system of equines destined to EU slaughter is in place in order to guarantee that the officials are in a position to sign the statement provided in point II.I.4 and II.I.7 of the EU "EQU" model official certificate laid down in Regulation (EU) 2020/2235 regarding the traceability of the animals and compliance with the veterinary medicinal products and residency requirements.
	Recommendation based on conclusions Nos 60, 61 and 62.
	Associated findings Nos 32, 40, 41 and 43.
2.	The central competent authority should ensure that the animal welfare of horses destined for EU slaughterhouses is not compromised. In particular, it should ensure effective controls at primary production level, including during transport, and enforcement of applicable national animal welfare requirements.
	Recommendation based on conclusions Nos 24 and 63.
	Associated findings Nos 19, 53 and 76.
3.	The central competent authority should ensure that the animal welfare issues detected at EU slaughterhouses are properly recorded and accurate information is transmitted to the competent authorities responsible for the controls at facilities supplying horses to the EU establishments, in line with Article 39(2)(b) of Regulation (EU) 2019/627 and in order to prevent their recurrence.
	Recommendation based on conclusion No 93.
	Associated findings Nos 49, 50 and 77.
4.	The central competent authority should ensure that the veterinary treatments administrated to equines destined to EU slaughter meet EU requirements and are properly registered in order to guarantee that the officials are in a position to sign the statements provided in points II.I.4 and II.I.7 of the EU "EQU" model official certificate laid down in Regulation (EU) 2020/2235.
	Recommendation based on conclusion No 64.
	Associated findings Nos 56, 57 and 58.

The competent authority's response to the recommendations can be found at: http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=2022-7442

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
Reg. 2022/2292	OJ L 304, 24.11.2022, p. 1–30	Commission Delegated Regulation (EU) 2022/2292 of 6 September 2022 supplementing Regulation (EU) 2017/625 of the European Parliament and of the Council with regard to requirements for the entry into the Union of consignments of foodproducing animals and certain goods intended for human consumption
Reg. 2021/405	OJ L 114, 31.3.2021, p. 118-150	Commission Implementing Regulation (EU) 2021/405 of 31 March 2021 laying down the lists of third countries or regions thereof authorised for the entry into the Union of certain animals and goods intended for human consumption in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council
Reg. 2020/2235	OJ L 442, 30.12.2020, p. 1–409	Commission Implementing Regulation (EU) 2020/2235 of 16 December 2020 laying down rules for the application of Regulations (EU) 2016/429 and (EU) 2017/625 of the European Parliament and of the Council as regards model animal health certificates, model official certificates and model animal health/official certificates, for the entry into the Union and movements within the Union of consignments of certain categories of animals and goods, official certification regarding such certificates and repealing Regulation (EC) No 599/2004, Implementing Regulations (EU) No 636/2014 and (EU) 2019/628, Directive 98/68/EC and Decisions 2000/572/EC, 2003/779/EC and 2007/240/EC
Reg. 2019/625	OJ L 131, 17.5.2019, p. 18–30	Commission Delegated Regulation (EU) 2019/625 of 4 March 2019 supplementing Regulation (EU) 2017/625 of the European Parliament and of the Council with regard to requirements for the entry into the Union of consignments of certain animals and goods intended for human consumption

Reg. 2019/627	OJ L 131, 17.5.2019, p. 51–100	Commission Implementing Regulation (EU) 2019/627 of 15 March 2019 laying down uniform practical arrangements for the performance of official controls on products of animal origin intended for human consumption in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council and amending Commission Regulation (EC) No 2074/2005 as regards official controls
Reg. 2017/625	OJ L 95, 7.4.2017, p. 1–142	Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, amending Regulations (EC) No 999/2001, (EC) No 396/2005, (EC) No 1069/2009, (EC) No 1107/2009, (EU) No 1151/2012, (EU) No 652/2014, (EU) 2016/429 and (EU) 2016/2031 of the European Parliament and of the Council, Council Regulations (EC) No 1/2005 and (EC) No 1099/2009 and Council Directives 98/58/EC, 1999/74/EC, 2007/43/EC, 2008/119/EC and 2008/120/EC, and repealing Regulations (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council, Council Directives 89/608/EEC, 89/662/EEC, 90/425/EEC, 91/496/EEC, 96/23/EC, 96/93/EC and 97/78/EC and Council Decision 92/438/EEC (Official Controls Regulation)
Reg. 2015/1375	OJ L 212, 11.8.2015, p. 7–34	Commission Implementing Regulation (EU) 2015/1375 of 10 August 2015 laying down specific rules on official controls for Trichinella in meat
Reg. 101/2013	OJ L 34, 5.2.2013, p. 1-3	Commission Regulation (EU) No 101/2013 of 4 February 2013 concerning the use of lactic acid to reduce microbiological surface contamination on bovine carcases

Reg. 37/2010	OJ L 15, 20.1.2010, p. 1-72	Commission Regulation (EU) No 37/2010 of 22 December 2009 on pharmacologically active substances and their classification regarding maximum residue limits in foodstuffs of animal origin
Reg. 1099/2009	OJ L 303, 18.11.2009, p. 1-30	Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing
Reg. 1950/2006	OJ L 367, 22.12.2006, p. 33-45	Commission Regulation (EC) No 1950/2006 of 13 December 2006 establishing, in accordance with Directive 2001/82/EC of the European Parliament and of the Council on the Community code relating to veterinary medicinal products, a list of substances essential for the treatment of equidae
Reg. 2074/2005	OJ L 338, 22.12.2005, p. 27-59	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Reg. 2073/2005	OJ L 338, 22.12.2005, p. 1-26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Reg. 178/2002	OJ L 31, 1.2.2002, p. 1-24	Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety