



**STATE OF ISRAEL**  
**MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT**  
**Veterinary Services and Animal Health**  
**The Department of Control of Animal Products**

FINAL REPORT OF AN AUDIT CONDUCTED IN

PARAGUAY

11 MARCH – 20 MARCH 2019

EVALUATING THE EQUIVALENCE OF THE FOOD SAFETY SYSTEM  
FOR BOVINE MEAT EXPORTED TO ISRAEL



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**1. INTRODUCTION**

The Israeli Veterinary Services and Animal Health (IVSAH) conducted an audit in Paraguay from 11 March to 20 March 2019. The audit team was comprised of two auditors from the IVSAH Central Competent Authority (CCA). Representatives from the Paraguayan CCA accompanied the auditors throughout the entire audit.

The opening meeting was held on 11 March 2019 in with SENACSA. At this meeting, the objectives and itinerary of the audit were confirmed.

**2. OBJECTIVES**

This was a routine equivalence verification audit. The objective of this audit was to evaluate whether the Paraguayan food safety system is equivalent to that of the IVSAH and will therefore continue to be eligible to export bovine meat to Israel.

The entire inspection chain was evaluated to determine whether Paraguay's official controls are sufficient to ensure that the food being exported to Israel is unadulterated and safe for human consumption, that there is minimal possibility for the entrance of animal disease, and that animal welfare is protected.

The specific objectives for this audit were the evaluation of official controls after the change in SENASCA officials, implementation of new IVSAH animal welfare requirements, verification of corrective actions in animal welfare court case, traceability, and verification of the corrective actions implemented pursuant to the IVSAH audit in 2017.

In order to achieve these objectives, the following sites were visited:

**Veterinary Services and Animal Health, P.O.B 12, Beit –Dagan, 50250**



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<b>AUDIT SCOPE SUMMARY</b>			
Visit/meeting		Number	Description
Competent Authority	Central (CCA)	2	SENASCA
	Regional (RCA)	3	During establishment audits
	Local (LCA)	3	Veterinary Inspectors within each establishment audited
Laboratory		1	Central Laboratory
Establishments		5	Beef slaughterhouses

### 3. LEGAL BASIS

The audit was undertaken under the general provisions of Israeli legislation and in particular Animal Diseases Regulations, (Meat Importation), 1974.

### 4. BACKGROUND

Paraguay is approved to export fresh and frozen beef to Israel. In 2016, a video was published of animal mistreatment in an approved establishment in Paraguay. Since then, Paraguay has implemented corrective actions to prevent further occurrences. Since the previous IVSAH audit, several of the senior members of the Paraguayan veterinary services were replaced.

### 5. FINDINGS: OFFICIAL CONTROLS

The CCA does not require establishments to write and implement:

- Animal welfare program

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- Traceability program
- Pathogen reduction program

If these programs are written and implemented, they are not verified by the CCA. Regarding the pathogen reduction program, the CCA only requires sampling for the detection of pathogens and not indicator organisms.

In reference to the official controls over establishments' food safety systems, the following deficiencies were noted:

1. There is no written approval of the establishment's corrective action of a noncompliance by the IVO or RCA.
2. On the noncompliance form the IVO can classify the problems as a NC or Observation. There is no written explanation of the difference between two terms. During the audits to the plants the IVOs also don't understand exactly what is the difference.
3. Establishments which are found to have a violation of residue monitoring is retested only three times further. A risk assessment with specific parameters is not performed to evaluate whether follow-up is required in the future

Despite the previously recorded noncompliance regarding the frequency of CCA audits performed, in 2017 and 2018, a very small number were performed. The IVSAH requirement is that the CCA does at least one visit yearly to each establishment exporting to Israel. The frequency of the RCA must be at least four times a year.

It was observed that there is a very marked difference in the level of knowledge and official controls performed by the local veterinarians (IVOs). There is no written procedure or law for the IVO which details how to perform an ante mortem inspection in the establishment. The directions are very

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general, and therefore each IVO performs according to his interpretation of the directions.

**Competent Authority Assessment**

Item Number	Item	scale							
1	Legal base including laws, rules and procedures	8. Good							
2	The structure of the Competent Authority (CA) ensures compliance with equivalence.	9. Very good							
3	The Central Competent Authority maintains a good domain over the entire inspection chain.	7. Satisfactory							
4	Training at the three veterinary inspectors levels of control.	7. Satisfactory							
5	Supervision of the CA over the self-control food safety programs implemented by the establishments.	7. Satisfactory							
6	Reliability.	9. Very good							
7	The health status of inspected establishments is reflected in the records of official controls and inspection services.	8. Good							
8	Official Controls meet the requirements of the State of Israel.	7. Satisfactory							
		Equivalence Level <b>7.8</b>							
Very poor	Poor	Very insufficient	Insufficient	Below Sufficient	Sufficient	Satisfactory	Good	Very good	Excellent
1	2	3	4	5	6	7	8	9	10

**6. FINDINGS: ANIMAL WELFARE AND IMPLEMENTATION OF IVSAH REQUIREMENTS**

On the welfare verification checklist there are references to ritual (kosher) slaughtering but they are not in accordance with the new IVSAH requirements. In addition, the monitoring frequency of welfare issues is only one a week, which is very low. There is no requirement for SENACSA to verify the welfare programs of the establishments.



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In several establishments, there was bruising consistently in certain area of the carcasses. Despite that, there was no investigation or plan to investigate the cause of the bruising and whether it is a welfare-related issue.

In two establishments, the use of shockers was not monitored and one facility exclusively used shockers instead of flags at the entrance to the slaughter area in direct contradiction to the IVSAH requirements.

In one establishment, the animals were waiting more than 10 seconds with their head restrained to be slaughtered in violation of the requirements of the Veterinary Services of Israel.

**7. FINDINGS: TRACEABILITY**

As stated previously, there is no requirement of the CCA for the establishments to create a traceability program and therefore there is no requirement to verify the existence of a traceability program in exporting establishments.



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**Establishment Assessment**

Item Number	Item	scale																				
1	Infrastructure	8. Good																				
2	Maintenance	8. Good																				
3	Sanitation	8. Good																				
4	Processes & activities	6. Sufficient																				
5	Self-Control Programs (food- Safety): HACCP, SSOP, PRPs, GMPs, SPSs, Pathogen Reduction	6. Sufficient																				
6	Self-Control Programs (Others): Animal Welfare, Food Defense, etc	6. Sufficient																				
7	Self Sampling of products and analysis results	8. Good																				
8	Traceability, Recall, Training	7. Satisfactory																				
		Equivalence Level <b>7.1</b>																				
		<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Very poor</td> <td>Poor</td> <td>Very insufficient</td> <td>Insufficient</td> <td>Below Sufficient</td> <td>Sufficient</td> <td>Satisfactory</td> <td>Good</td> <td>Very good</td> <td>Excellent</td> </tr> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5</td> <td>6</td> <td>7</td> <td>8</td> <td>9</td> <td>10</td> </tr> </table>	Very poor	Poor	Very insufficient	Insufficient	Below Sufficient	Sufficient	Satisfactory	Good	Very good	Excellent	1	2	3	4	5	6	7	8	9	10
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**8. CLOSING MEETING**

A closing meeting was held on 20 March 2019 with representatives of the competent authorities. At this meeting, the main findings of the audit were presented by the auditors.

**9. NONCOMPLIANCES**

A complete list of all noncompliances observed can be found on the IVSAH website [www.foodinspection.co.il](http://www.foodinspection.co.il).

**10. CONCLUSION**

During the audit there were no significant human health risks that need to be immediately addressed. However, there are significant noncompliances that must be addressed, most specifically regarding official controls and animal welfare in order remain in conformance with the IVSAH requirements.



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SENASCA is requested to post proposed corrective actions and estimated date of implementation to the website for approval by IVSAH. The implementation of these corrective actions should be verified by SENASCA and will be verified by the IVSAH during a subsequent audit. The IVSAH may request additional information regarding Paraguay's inspection procedures related to verification of establishment HACCP systems. The IVSAH will continue to evaluate the Paraguayan food safety system based on these actions and will notify you of our final determination.