STATEMENT OF COMPLIANCE 2019 FOR THE U.S.A. IMPORTERS

I. Exporting beef products to the United States of America

1. The Establishment is approved by the Ministry of Agroindustry of Argentina to manufacture for export bovine meatfit for human consumption. It has the Register Nº 2520, issued by the National Service of Health and Agroalimentary Quality (SENASA), agency dependent on the Ministry of Agroindustry.
2. Argentina is an active beef exporting country to the United States of America and the Establishment is approved by the USDA – FSIS to export bovine meat for human consumption to the US territory (USDA, Eligible Foreign Establishments: Argentina, up-dated on June 10 of 2019.
3. The FSIS has determined that Argentina has an equivalent E. Coli O157 and Non O157 Shiga- toxin-producing Escherichia Coli (STEC - O26, O45, O103, O111, O121 and O145) control Program.
4. The Q.A. Department has in place all the records which are preserved on file for 3 years.

II. The Establishment Pathogen Reduction Program

1. The Establishment has an operative and documented HACCP-based food safety assurance system, verified by the SENASA. It complies with the U.S. Federal Register, 9 CFR Part 304, et al. and includes a documented Sanitary Standard Operating Procedure (SSOP) Plan. The Establishment operates under Good Manufacturing Practices (GMP) mandated by the U.S. Federal Register, 21 CFR Part 110.
2. The Establishment HACCP-based food safety management system:
   a) Is periodically reassessed and internally audited.
   b) Is continuously audited by the Officers from the Official Competent Authority – SENASA.
   c) Is periodically audited by FSIS Officers and by the Competent Sanitary Authorities of other countries.
   d) Is periodically audited by international commercial customers and certification bodies (GSFS).
3. The standard performance criteria and the testing of generic *Escherichia coli* bacteria to verify the effectiveness of the sanitation process control of cattle carcasses are operative.
4. The Establishment participates in the National Program for *Salmonella* spp. cattle carcass testing and control, issued by the SENASA.
5. The Establishment participates in the National Program for *Escherichia coli* O157:H7 control and testing issued by the SENASA, which is lined up with the FSIS Regulations.
6. The Establishment follows the SENASA Rule for the control and testing of Non O157 Shiga- toxin-producing *Escherichia coli* (STEC - O26, O45, O103, O111, O121 and O145) issued in May of 2012, which is lined up with FSIS Regulations.
7. The Establishment has in place the current *E. coli* O157:H7 and Non O157 Shiga- toxin-producing *Escherichia coli* (STEC) N60 sampling Methods, as defined by the SENASA and the FSIS regulations.
8. The Establishment follows the USDA-MLG 5 Series for laboratory testing.
9. All testing results are available before the beef products container is released for shipping.
10. The Establishment control procedure for *E. coli* O157:H7 and *E.coli* non-O157 are based on production LOTS. LOTS are defined following FSIS and SENASA guidelines. Under these requirements, no LOT will be subdivided into more than one shipping container.
11. The Establishment HACCP System Reassessments done by the HACCP Team includes:
    a. The HACCP Plan which has been initially validated on March of 1999 (CFR Part 304, §417.4(a) (1).
    b. Periodically or annually the Establishment develops a Verification up-date (Reassessment) to assure product safety (9 CFR Part 304, §417.4 (a) (2) and (3).

12. The Establishment HACCP Reassessment for E.coli O157:H7 and for E.coli non O157 (STEC) states:
    a. The Hazard Analysis Reassessment for E. coli O157:H7 concluded that this hazard –as an unforeseen hazard- is not reasonable likely to occur in the Establishment products.
    b. The Hazard Analysis Reassessment for Shiga toxin producing *E. coli* non O157:H7 (STEC - O26, O45, O103, O111, O121 and O145) concluded that this hazard –as an unforeseen hazard- is not reasonable likely to occur in the Establishment products.
    c. If a deviation not covered by a specified corrective action occurs, or if an unforeseen hazard arises, the Establishment: (a) Segregates and holds the affected product; (b) Takes action to ensure that no product that is injurious to health or otherwise adulterated, as a result of the deviation, enters into commerce; (c) Performs a reassessment of the Food Safety System, to determine whether the newly identified deviation or other unforeseen hazard should be incorporated into the HACCP plan; (d) Records all corrective actions taken, which are subject to verification by the Official Competent Authority (SENASA).
    d. If a deviation occurs, the Establishment changes from routine sampling to follow up sampling and microbiological control of beef under the Official Competent Authority (SENASA) supervision.
    e. Training additional activities were performed with the Establishment personnel on hygiene practices, daily sanitary standard operations (SSOP) and related good manufacturing practices (GMP), throughout slaughtering, chilling, deboning, packaging, cold storage and containers loading.

III. The Chemical contaminants and veterinary drugs residues

1. The Establishment carries out periodic sampling and informs about residues of veterinary drugs as a result of their eventual use in cattle against some animal parasites and follows the local regulations of SENASA on preventive measures and controls under the National Program for Residues and Hygiene Control in food (CREHA).
2. The Establishments beef shipments to the US fulfilled with the FSIS Import Procedures for Meat during the last year period and no beef products refuses were made on this subject.

IV The Pathological issues

1. The Establishment continues with the preventive and corrective measures in place to control and eliminate any pathological tissue generated in livestock as a consequence of cattle vaccination against local animal diseases.
2. The SENASA and the Establishment follows this control measures during the slaughter and deboning operations, controlling and rejecting to exportation the damaged beef final products.

V. The Bovine Spongiform Encephalopathy (BSE) preventive measures

1. The Establishment follows strict local and international rules and regulations on “Specific Risk Materials” (SRM) as preventive measures to Bovine Spongiform Encephalopathy (BSE) disease and Argentina continues having the 2016 “Negligible BSE risk Status” of the World Organization for Animal Health (OIE).
2. Under official regulations (SENASA), Argentina does not import live animals or their products from countries having a controlled BSE risk or from countries recognized as having an undetermined BSE risk.

3. The Official Veterinary Inspection Office performs a daily ante mortem inspection procedure, condemning every cattle dead, dying, disabled or diseased and determining their proper disposition.
4. As required by FSIS, the Establishment does not use penetrative captive bolt stunning devices that inject air into the cranial cavity of cattle during slaughter.
5. The Establishment has a post mortem GMP procedure for handling and disposition of the bovine SRM: brain, head, eyes, trigeminal ganglia, spinal cord, dorsal root ganglia, tonsils and the distal ileum of the small intestine. The final disposition of the SRM includes an inactivation process in the digester and appropriate waste disposition.
6. The Official Competent Authority, SENASA issued on December of 2004 the Resolution N° 1389 forbidding the use of animal products and by-products as ruminants feeding.

VI. The Animal Welfare preventive measures

1. The Establishment follows the World Organization for Animal Health (OIE) and the U.S. A.M.I. Guidelines on Animal Welfare on livestock transport and slaughter operations.
2. The Establishment has written procedures for Animal Welfare control and makes reviews both internal and third party audits.

VII. The Food Defense Plan

1. The Establishment has in place a written voluntary Food Defense Plan for policies and procedures in all areas of the Plant to strengthen their protection against any potential and deliberate practices that could violate the products, the consumers, the human resources or the property of the Company.

2. The Food Defense Plan follows the FSIS recommendations and it is inner and annually audited.

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