

DIPOA has sent the following comments to the Report:

- **Executive Summary – page II**

“At the time of the DG SANTE audit the central competent authority had not considered any long term actions to prevent similar situations in the future.”

Comments - MAPA is adopting long term actions, as indicated below:

- 1) reorganization of personnel with the permanent contracting of 300 official veterinarians (as informed in action plan);
- 2) implementation of the MAPA compliance program established by Administrative Rule no. 705, of April 7, 2017 (not included in the action plan once it is underway in MAPA’s administrative area); and
- 3) proposal of technical and administrative “verticalization” of the Federal Inspection Service (SIF) as a way of making the system more robust against political interference (it is not included in the action plan once it is underway in MAPA’s administrative area).

Request: Deletion/Adjustment of the sentence, considering that long term actions were considered and its adoption is underway.

- **Conclusions on competent authorities’ response to the recent police investigations in the meat sector – pg 27**

“90. The CCA reacted swiftly to the police investigations. However, the actions were limited to the establishments under police investigation and the staff involved.

91. The CCA deemed it unnecessary to investigate further in other establishments or to take measures to prevent similar situations in the future. Long term actions involving the whole meat sector and staff have not been considered.”

Comments - In 2017, in the face of nonconformities raised on the "weak meat" operation and its unfolding, there was an administrative decision not to establish a formal audit schedule for the current year, concentrating efforts to investigate complaints received by internal or external channels to MAPA. Apart from the group of 21 companies audited several others have already been audited in this current year in all areas.

Specifically for the EU, audits have been scheduled at all approved establishments located in the state of Paraná and in SIPOA-PR. As stated in the Action Plan already sent, all Brazilian poultry slaughterhouses approved to export to the EU will be audited.

We emphasize once again that the main objective of the police investigation was the fight against corruption, and for this purpose, in an investigation that lasted more than 2 years, there were tools that MAPA does not legally have, such as: breach of confidentiality and wiretapping, among others.

Request: Adjustment of the text, taking into account that long term actions were considered and its adoption is underway and that MAPA focused its efforts on evidences of wrong doing using the tools available for its services, more limited than the ones used by the police.

- **6 OVERALL CONCLUSIONS – pg 28**

“The central competent authority was found to have reacted swiftly to the police investigations, including suspension of production and certification from the export listed establishments, preventing export of non-compliant product to the EU. However, their actions were limited to the 21 establishments under police investigation and the staff involved: they carried out no investigations of linked establishments (e.g. belonging to the same food business operator) or into official staff subject to investigation working at other locations. At the time of the DG SANTE audit the central competent authority had not considered any long term actions to prevent similar situations in the future.”

Comments – Please see the comments above.

Request: Adjustment of the text, taking into account that long term actions were considered and its adoption is underway and that MAPA focused its efforts on evidences of deviations using the tools available for its services, more limited than the ones used by the police.

Please don't hesitate to contact us if you have some question.

Please, confirm the receipt of this message.

Best regards,

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Ministry of Agriculture, Livestock and Food Supply of Brazil
Mission of Brazil to the EU

* Please note that it has been necessary to delete this text in order to respect the provisions of Article 339 of the Lisbon Treaty as regards confidentiality.