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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

POLAND

FROM 09 TO 13 JUNE 2014

IN ORDER TO EVALUATE THE IMPLEMENTATION OF ANIMAL HEALTH CONTROLS IN
RELATION TO AFRICAN SWINE FEVER

In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.

Executive Summary

The report describes the outcome of an audit carried out by the Food and Veterinary Office in Poland from 09 to 13 June 2014.

The objective of the audit was to evaluate whether relevant measures applicable to African swine fever have been implemented effectively to:

- Prevent the disease from spreading into the domestic pig population in the infected area;*
- Prevent the disease from spreading outside the infected area via live domestic pigs, meat or meat products from domestic or feral pigs; and*
- Provide sufficient guarantees that restrictions on movement of live pigs, germplasm, meat or meat products from domestic or feral pigs are applied as per Union legislation.*

Overall, the report concludes that:

Surveillance and control activities in relation to African swine fever are a clear priority for the Polish Competent Authorities. The comprehensive system adopted for control of wild boar in the restricted area provides acceptable guarantees in relation to the risk management of hunting activities and (trade or movement) of wild boar meat but needs closer monitoring by the CA.

The adoption of biosecurity measures remains a challenge in a context of numerous backyard holdings in the restricted area. The activities implemented have reinforced awareness on biosecurity and improved the knowledge on such holdings in order to prevent the spread into this population, but controls were insufficient. The existing official pig movement and registration system (managed by one Competent Authority) has not been used to manage the African swine fever controls. Instead a parallel ad-hoc system has been put in place by the Competent Authority but this system has limited potential as an effective tool for animal health controls. Surveillance of domestic pigs in the restricted area is implemented, but is affected by the lack of control of the inspections performed on on-farm slaughter. In summary measures to prevent African swine fever from spreading into domestic pigs in the infected area have been implemented, however the system in place needs to be further strengthened, in particular by implementation of official controls to verify its effectiveness as required by Article 15(2)(a) of Council Directive 2002/60/EC.

The system in place for definition of the eligibility, restriction, and traceability of meat from wild boar or pigs from the protective area to the national market is effective. The system for marking pig meat from the restricted area eligible for the EU market is defined and applied largely in line with the requirements, but insufficiently controlled. Overall, the system is able to prevent the spread of African swine fever outside the restricted area via such meat and meat products. No movement of live pigs outside the restricted area has occurred (other than for direct slaughter), and no semen collection centre is located in this area.

No immediate health risk was identified.

Recommendations are made to the Competent Authorities of Poland to address the shortcomings described in the report.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
ARMA	Agency for Restructuring and Modernising Agriculture
ASF	African swine fever
CA	Competent authority
CCA	Central competent authority
DVO	District veterinary officer
EU	European Union
FVO	Food and veterinary office
MARD	Ministry for Agriculture and Rural Development
MS	Member state
OV	Official veterinarian
PA	Protective area, as defined in Annex I to Commission implementing decision 2014/178/EU
PHA	Polish hunter association
RA	Restricted area, as defined in Annex I to Commission implementing decision 2014/178/EU (which is also the infected area defined in the Polish eradication plan endorsed by the European Commission).
RCA	Regional competent authority
SFA	State forestry administration
VI	Veterinary Inspection

1 INTRODUCTION

This audit took place in Poland from 9 to 13 June 2014. The audit team comprised two Food and Veterinary Office (FVO) auditors. The audit was added to the annual FVO programme following the notification of cases of African Swine fever (ASF) in wild boar, and the adoption of regionalisation measures.

The FVO team was accompanied by a representative from the central competent authority (CCA), the Veterinary Inspection (VI) from the Ministry for Agriculture and Rural Development (MARD).

2 OBJECTIVES

The objective of the audit was to evaluate whether relevant measures applicable to ASF have been implemented effectively to:

- Prevent the disease from spreading into the domestic pig population in the infected area;
- Prevent the disease from spreading outside the infected area via live domestic pigs, meat or meat products from domestic or feral pigs; and
- Provide sufficient guarantees that restrictions on movement of live pigs, germplasm, meat or meat products from domestic or feral pigs are applied as per Union legislation.

The scope included pig holding registration, animal identification for pigs; establishment of the infected area - surveillance and census of pigs on holdings; biosecurity on holdings, hunting grounds and relevant establishments; movement controls of pigs; controls on meat, meat products and by-products of pig origin; sampling and turn-around time for analytical results.

Preparedness for outbreaks was excluded from the scope of this audit. Contingency planning was assessed during an audit in 2008 (DG(SANCO) 2008-7789-MRFINAL¹). The competent authority has addressed all the recommendations of that audit in their action, and simulation exercises have been organised in 2013. The implementation of border controls against ASF were also excluded from the scope of this audit because that topic was covered by another recent FVO audit (report reference: DG(SANCO) 2013-7115 – MR FINAL)².

In pursuit of this objective, the following sites were visited:

Site visited	Number	Comments
Central Competent Authority	1	
Regional Competent Authority	1	
Local Competent Authority	2	
Game collection centre	1	
Game handling establishment	1	
Hunter association	1	
Pig holdings	2	Backyard holding, commercial holding
Collection centres	2	
Slaughterhouse	2	

1 http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=2041

2 http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=3220

3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation, in agreement with the competent authority of the country, and in particular under:

- Article 45 of Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules;
- Article 20 of Council Directive 2002/60/EC laying down specific provisions for the control of African swine fever and amending Directive 92/119/EEC as regards Teschen disease and African swine fever.

Other relevant legislation for this audit is mentioned in the Annex to this report.

4 BACKGROUND

Since the declaration of outbreaks of ASF in Georgia in 2007, the disease has spread to several neighbouring countries: it was identified in feral and domestic pigs in Armenia and Russia in 2007, in Ukraine in 2012, and in Belarus in 2013. Poland has increased surveillance throughout the country since 2011 in order to detect the disease as early as possible and to allow rapid response. The measures were further stepped up in 2013 by establishing a buffer zone along the borders with third countries.

Poland informed the Commission of the confirmation of the disease in two wild boars along its border with Belarus in February 2014. Ten districts or part of districts (in three regions) around these cases were declared as an infected area and activities and bio-security measures were upgraded in order to increase the ability to detect any further cases and to prevent the disease from spreading into domestic pig population. This regionalisation was made official through Commission implementing Decision 2014/100/EU³

The zoning was reviewed by Commission implementing Decision 2014/178/EU, laying down movement restrictions and conditions, at national or international level, for live (domestic and feral) pigs and product from pigs, originating from eight districts or part of districts of the *Podlaskie* region, with two different areas (Parts I and II) defined according to the level of restriction. An eradication plan has been submitted to the Commission, in line with Article 16 of Council Directive 2002/60/EC, naming the protective area a buffer area, and the restricted area an infected area. For the rest of the report these areas will be named protective area (PA) and restricted area (RA).

³ <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014D0100&qid=1402070325256&from=EN>

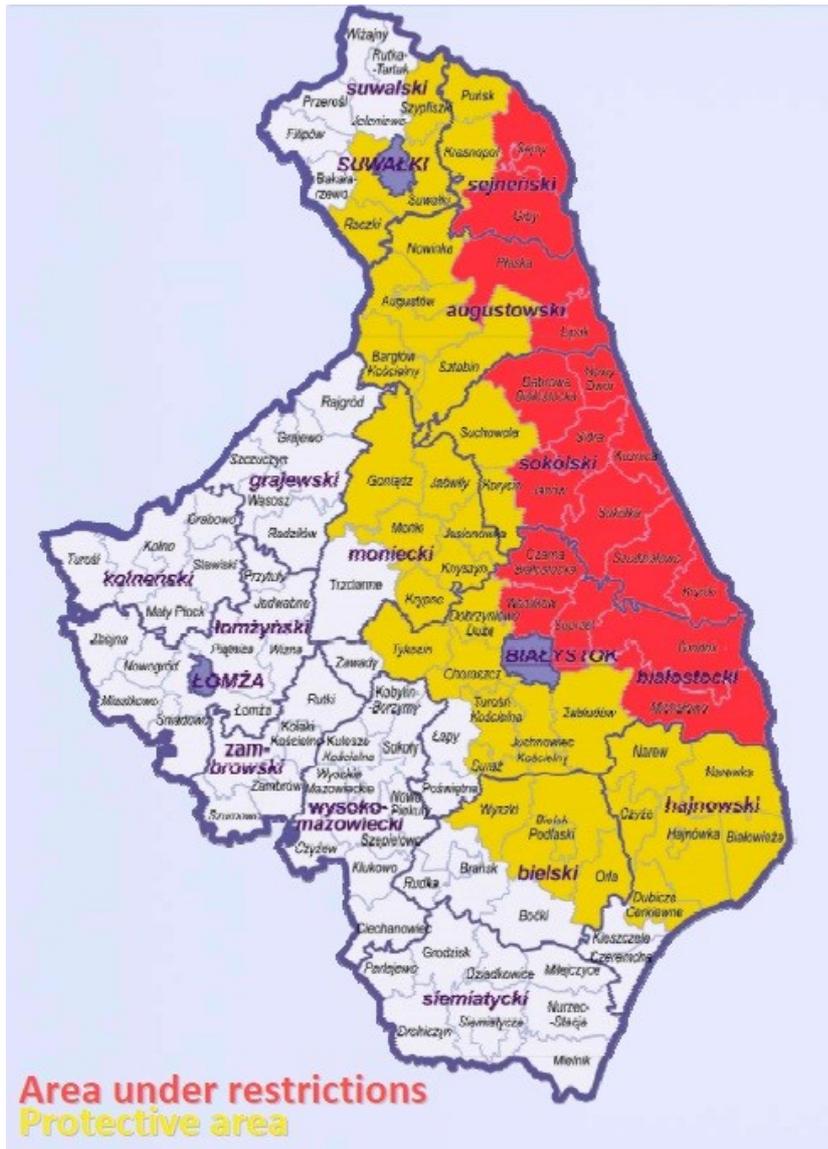


Figure 1: zoning of the *Podlaskie* region in relation to African swine fever, as defined in Commission implementing Decision 2014/178/EU.

5 FINDINGS AND CONCLUSIONS

5.1 ORGANISATION OF THE OFFICIAL CONTROL SYSTEM

Legal basis: Regulation (EC) No 882/2004; Directive 2002/60/EC (Articles 15 and 16, Annex VI)

5.1.1 Competent Authorities

The FVO audit team noted that:

- MARD published a Regulation (MARD Regulation 420, of 31/03/2014), defining details for the implementation of Commission Decision 2014/178/EU. This regulation was adopted two days after the publication of the Commission Decision.

- The website of the CCA compiles in a specific page information and legislation taken against ASF⁴. Numerous guidelines and instructions have been issued by the CCA in relation to ASF surveillance and control measures to be applied in the RA and PA. The National Reference Laboratory also has a dedicated web-page for ASF⁵, where monthly results, information and training material are available.
- The VI had developed an eradication plan in line with Article 16 of Directive 2002/60/EC. This plan was submitted to the Commission and approved three days before the onset of this audit. The VI indicated that, although some measures are already in place, the plan will need to be transposed into national legislation to be fully effective.
- The VI has regularly communicated information on ASF situation to neighbouring countries. A meeting with the veterinary authorities of Belarus was foreseen to be held before August 2014⁶.
- An expert group has been appointed, gathering experts (including veterinarians, hunters, biologists and epidemiologists) in addition to a representative of the CA. The group initiated its assistance tasks in line with Article 15 (2)(a) of Directive 2002/60/EEC. Among the required duties spelled out by this Article, it had not yet assisted the CA in carrying out checks to verify the effectiveness of the measures adopted in the infected area, and was not involved in the decisions taken by the local CAs regarding suspension of hunting in the area following the third and fourth cases ASF in wild boars.
- No additional staff have been allocated to the districts in charge of the RA. The region in which the RA is located requested one official veterinarian (OV) for each of the five districts affected. The FVO team asked for but did not receive the assessment method used to assess the need of additional workforce.
- Districts can designate private veterinarians to carry out official tasks (ante and post-mortem inspection of slaughter animals, sampling, certification), using a contract developed at national level. It is left to the district veterinary officer (DVO) to determine the appropriateness or limitation of delegation to private veterinarians in his/her area. One district visited had delegated the sampling and certification of pigs to allow their movements to private veterinarians: the same tasks remained the exclusive competence of the OV in another one. Private veterinarians performing official tasks issue monthly reports of their activities. As reported in the following chapter, their performance varied, and was unsatisfactory in some cases, and the system for evaluating their performance in relation to control of ASF was limited to documentary review.
- Training was organised at regional and district level for official and private veterinarians. The delegation of tasks for ASF to private veterinarians was not linked to a participation in such training sessions, as the contracts of delegation pre-dated the occurrence of the first case of ASF. However, clear guidelines were distributed to the private veterinarians.

4 <http://www.wetgiw.gov.pl/asf/>

5 <http://www.piwet.pulawy.pl/>

6 In their response to the draft report, the Competent Authority noted that the meeting took place on 29 August 2014 in Bialystok

Conclusions

ASF in Poland has been a high priority of the VI, which communicates extensively on its activities and their results. The expert group required to assist the CA has been adequately established and is in the process of implementing its duties. However its tasks in verification of effectiveness of measures adopted and establishing appropriate measures to be applied remains to be implemented.

The absence of a clear system to assess need for additional human resources may lead to inadequate deployment of resources and impact the correct application of the eradication plan.

The level of supervision of CA staff, in particular designated private veterinarians was insufficient to ensure a consistently adequate performance of their duties.

5.2 HOLDING REGISTRATION, ANIMAL IDENTIFICATION, MOVEMENT CONTROLS

Legal basis: Article 18 of Council Directive 64/432/EEC; Council Directive 2008/71/EC; Article 15 of Council Directive 2002/60/EC; Commission Decision 2006/80/EC; Commission Decision 2000/678/EC.

5.2.1 System in place

Holding registration, animal identification and registration of movements is managed by the paying Agency for Restructuring and Modernisation of Agriculture (ARMA). The national legislation, transposing inter alia Directive 2008/71/EC and Article 18 of Council Directive 64/432/EEC, foresees the cooperation between the VI and ARMA.

The identification mark to be applied to pigs before they leave the holding of birth can either consist of an ear tag, ear tattoos (one on each ear), or a slap mark on the shoulder. All keepers, except transporters, must keep a holding register stating the number of animals, with record of movements, as described in Article 4 of Directive 2008/71/EC. National legislation also foresees that the keepers must notify the national database of movements (in and out) and death of animals (including on-farm slaughter), within 30 days, as well as the origin and destination of animals moved. Slaughterhouses and rendering plants must notify movements within thirty and seven days respectively. The VI can consult directly the holding national database, and can ask ARMA to extract any information based on queries of the database.

The FVO audit team noted that:

- The derogation for registration of pig holdings of not more than one pig, in line with Commission Decision 2006/80/EC, is still applicable, including in the RA.
- The holding national database covers various animal species. The information contained cover the required fields detailed in Commission Decision 2000/678/EC, except for the geographic coordinates of the holdings. ARMA indicated that the database is linked with a database recording the location of the land parcels of holdings, and therefore is considered sufficient as geographical indication of holdings. The VI indicated that in case of outbreak, they would take the geographic coordinates of the holding. A field to enter sanitary information was available in the database, but not used in the context of ASF control⁷. The

⁷ In their response to the draft report, the Competent Authority noted that VI and ARMA were working on the creation of a functional system to enter restriction of movements from herds for animal health reason.

VI developed a parallel pig holdings and movement database for their management of the Aujeszky's disease programme⁸, largely based on data collected during certification of pig movements. This database is being used for movement controls for ASF within and from RA. However certain data such as pig deaths, births, slaughter on-farm, holding geographical coordinates are not recorded into the database and these missing data limit the potential use of the database for comprehensive and effective animal health controls.

- Holding registers, of an official format, were available at the holdings visited, except at one collection centre.
- The national legislation does not require that documents accompanying movement of pigs make a reference to the ear-tag or tattoo, contrary to the requirement of Article 5(2) of Directive 2008/71/EC. At one slaughterhouse, the identification of the pigs (different from the holding registration number of the holding of origin) was not indicated on the commercial document, which was the only document accompanying pigs to slaughterhouse (apart from the food chain information) when they did not originate from the RA. This shortcoming has no impact on movement between holdings, as the national legislation for Aujeszky's disease control programme foresees that these movements be accompanied by a health certificate where identification of pigs must be mentioned.

5.2.2 *Official controls*

Following the identification of ASF cases in wild boars, the CA took a number of measures, including establishment of zones in the 3 km and 10 km radius around the cases⁹ where, in addition to measures foreseen in Article 15 of Directive 2002/60/EC (census, movements of pigs after authorisation of the CA), additional national controls measures and supervision were applied. A census was performed by visiting the holdings, and a record of number of pigs per category was compiled by OV's during their visits, and signed by keepers. The official controls foreseen in the eradication plan recently approved by the Commission will be implemented once the plan has been made applicable at national level.

The FVO audit team noted that:

- The delimitation of the 3 and 10 km areas was done at district level on a map. A list of all holdings registered (with or without pigs) within these areas was established, and used as a basis for the visits of all holdings and carrying out a complete census. The pig holding database was not directly used to identify the holdings within the 3 and 10 km radius of the cases (no use of the geographical indications to determine which holding was within the defined zones).
- The census records reviewed by the audit team in one municipality showed a high variation of recorded visits: in some clusters, 100% of keepers had signed the census sheet, but only 15% of them had signed it in other clusters. The presence and number of pigs as registered in the database was not used as a guidance for these visits: around 40% of the keepers registered in the database with some activity in relation to pigs, had not signed the census sheets (and the holdings were indicated with no pig).

⁸ In their response to the draft report, the Competent Authority noted that DVOs have a **statutory obligation** to keep a register of holdings (pursuant to the Act on animal health protection and eradication of animal infectious diseases)

⁹ http://ec.europa.eu/food/committees/regulatory/scfcah/animal_health/docs/20140304-05_asf_pl_en.pdf

- On the other hand, in the same municipality, 40 new keepers were identified during the census (keepers with a holding number in the database, but with no record of pig presence), of which 34 had more than one pig. The results of the census was transmitted to ARMA, but it did not trigger an update of the ARMA database. No information on the number of new holdings identified during the census could be provided to the FVO audit team.
- The holding registers did not bear evidence of checks of the OV during the census. The VI indicated that they could not sign or make official comments on the registers, as it was the responsibility of ARMA to do so. As the registers did not bear information on pigs per category, the keepers were instructed by the VI to keep a second register, detailing the presence of pigs per category. The second register presented by the keeper was of an unofficial format; the keeper was upset by the multiplication of administrative requirements.
- One keeper registered a movement from his holding to an unrecorded destination: this was not queried during the census¹⁰. Movements of sows for (natural) insemination were not recorded or investigated.
- The census confirmed the large presence of backyard holdings in RA: many holdings have few pigs, and intermittent activities: in the municipality reviewed by the audit team 60% of the holdings with pigs (78) had five pigs or fewer, and another 10 % of the holdings had six to ten pigs.
- ARMA was not directly involved in the census or update of the holding registers and update of the database. They indicated that they also perform spot checks in holdings, but they performed only 43 such checks in the area covered by ASF restriction between March and May 2014.
- One of the two collection centres visited in the RA, while being under direct supervision of OV, had no official holding register, and was not notifying any movements to the database.
- No semen collection centre was operating in the RA. The CA indicated also that no pigs were sent outside the RA to other parts of the Polish territory (other than for direct slaughter): the derogation foreseen in Article 3 of Decision 2014/178/EU had not been used.

Conclusions

The national system for holding registration, animal identification and movement control is largely in line with EU requirements, giving a good basis for animal health official controls. The shortcoming related to traceability of pigs during movements would only affect traceability of movements to slaughter from the areas which are not under restriction, with limited consequences in the scope of this audit.

However the insufficient collaboration between the VI and ARMA for the verification, maintenance and use of traceability tools led to the fact that the official system is not being updated after census and only scarcely used for ASF controls. Instead, a parallel system has been developed, putting additional requirements and strain on the keepers.

¹⁰ In their response to the draft report, the Competent Authority indicated that they will submit an initiative for movements of single pigs to be covered by official supervision in order to identify the place of destination by amending the legal provisions with an obligation to enter data on such holding in the register of animals.

The tradition of backyard pig rearing represents (often with only seasonal activities on site) a particular challenge for the identification of all holdings in the region affected. The derogation of registration of holdings of keeping one pig would be of limited consequence if all other parts of the system were enforced, as it would allow their identification from the movement registers of the providers. As this was not the case, and the census performed did not investigate all movements from the holdings visited, a proportion of officially registered holdings was declared as inactive without evidence. There is uncertainty in relation to the number of holdings with pigs in the RA, and on the traceability of all movements.

The absence of collection of semen and of movement of live pigs (other than for direct slaughter) from the areas under restriction, guarantees the observance of the prohibitions for EU trade on these commodities and provides assurances that the spread of disease outside the RA via these commodities is unlikely.

5.3 BIOSECURITY MEASURES

Legal basis: Directive 2002/60/EC

5.3.1 Biosecurity in relation to wild boar

In addition to normal field surveillance of hunting activities performed by the State Forestry Administration (SFA, an administration of the Ministry of Environment, which owns 77% of the forests in Poland) and the Polish Hunter Association (PHA, a body in charge of control of hunting activities, leased to hunting clubs on 95% of the Polish territory), hunting in the RA is under the control of the VI: collective hunts are prohibited, and hunting of wild boar is subject to licences delivered by the DVO on a monthly basis following a risk assessment. The eradication plan foresees that the annual hunting “bag” remains as for previous years (no depopulation or increased pressure). The annual hunting plan is agreed with the SFA after consultation of the PHA, based on stock inventories performed in February/March by forest rangers and hunters. Hunting of wild boar is allowed all year round, except for sows (prohibited between March and August). Feeding of wild boar is prohibited in the RA.

Wild boars currently shot in the RA are eviscerated on the spot, where hunters must take blood samples. All carcasses and viscera must be brought to a collection point, and kept in a cold store until negative laboratory test result of the sample is obtained. Offal are then processed as category II animal by-products (in line with Article 16(3)(g) of Directive 2002/60/EC).

Control of hunting is performed by PHA, SFA and hunting guards (reporting to the Regional governors).

A cooperation and coordination agreement is in place between the VI and the State Sanitary Inspection (of the Ministry of Health), in charge of controls over disposal of catering waste.

The FVO audit team noted that:

- A hunting ban was imposed in the 10 km zones around the two first ASF cases in wild boar. The responsibility of the 10 km zone around the last cases was shared between two DVOs: one of them imposed a hunting ban for a month (withdrawing a previous licence), where the other one did not consider it necessary¹¹.

¹¹ In their response to the draft report, the Competent Authority indicated that the chief veterinary officer issued an

- The hunting licences issued by the DVO were not linked to written requirements or instructions. The renewal of the licences was not linked to compliance with sampling and storing all wild boar shots. As not all hunting clubs have a cold store, they are allowed to carry the carcasses and offal to a place outside their hunting grounds (within the RA), which can be under the supervision of another DVO.
- Based on the expert group recommendation, the eradication plan foresees that evisceration of wild boars must be performed at the collection point. The collection point visited by the FVO audit team had no suitable installation that would allow to perform such operation in a biosecure way (allowing collection of fluids, and cleaning and disinfection of the place), despite the availability of disinfectant. The public health risk related to delayed evisceration (especially in summertime) was not addressed.
- A very strict procedure for controlling carcasses awaiting test results was in place at the cold store visited, on an all-in/all-out basis. The hunting club explained that this was a further limiting factor to hunting activities (as they could not avail of space in the cold store during this time).
- The bins on the roads or at the petrol stations close to the borders have been identified by the VI as a risk, and instructions were given to the road authorities, in charge of collecting this garbage, in order to proceed with their safe disposal.
- A regional meeting was held in February 2014 between the VI and the State sanitary inspection service, in order to exchange information and increase awareness of the latter service. No review of the system for disposal of catering waste has been initiated in order to identify possible gaps or shortcomings¹².

5.3.2 Biosecurity in relation to pigs

In addition to movement controls within the RA, pig holdings were instructed to adopt other biosecurity measures in line with requirements of Article 15 of Directive 2002/60/EC (means of disinfection at the entrance and exits of holdings and buildings, hygiene measures to be applied to avoid direct or indirect contact with feral pigs, including a 72 hours ban of contact with pigs after wild boar hunting). Instructions have been reinforced at collection centres and slaughterhouses for cleaning and disinfection; vehicles transporting pigs to slaughter must be disinfected prior to leaving the slaughterhouse. The National reference laboratory (NRL) posted on its website training material which included recommendations on disinfectants to be used and their concentration.

The FVO audit team noted that:

- No open-air holding is present in the RA, according to the CA.
- Farmers and hunters met were aware of the risk of ASF with wild boar, thanks to intensive CA information campaigns through media, messages given at local gatherings, and distribution of leaflets. However, no clear written instructions or undertaking in relation to biosecurity requirements at pig holdings were developed for the farmers or the hunters in

instruction not to apply hunting bans around cases in wild boars.

¹² In their response to the draft report, the Competent Authority indicated that they sent a letter to the chief sanitary inspectorate on 23/06/2014 to strengthen the supervision over catering waste processing in the affected region.

order for them to avoid any spread of the disease¹³. The persons met were not aware of the 72 hours rule.

- The CA indicated that the existence of a ban on swill feeding was pointed out to farmers during the census visits, and that controls will be performed during the inspections foreseen within the framework of the eradication plan. As a consequence, at the time of FVO audit no information was available as regards farmers' compliance with the established biosecurity requirements.
- Disinfectant and disinfection mats were available at the holdings visited, although they were not very efficient in the non-commercial holding. Equipment and instructions for cleaning and disinfection were of a very good standard at establishments visited. Documentation of disinfection at these places was available.
- No list of officially approved disinfectants and their concentration to ensure destruction of ASF has been developed by the CA, contrary to the requirement of point 1(b) of Annex II to Directive 2002/60/EC¹⁴. The CA explained that they were reluctant to issue a list of commercial products that could be legally challenged. The lists from the NRL training material were not consistent (different concentrations recommended for a same disinfectant), and products which were not on the list were used in establishments.

Conclusions

Measures are taken to prevent ASF from spreading from wild boars into the domestic pig population in the infected area. The measures provide assurances that should the disease re-emerge, its further spread is limited before being detected.

A comprehensive system for control of wild boar shot (and found dead) was in place, useful both for biosecurity (avoid potential infective carcasses or offal to be released) and surveillance (see next chapter) purpose. This system was applied through intense information campaigns, and extensive collaboration with forestry administration and the hunter association. The system for control of shot wild boar was insufficiently monitored by the CA to ensure its full application¹⁵.

Decisions on suspension on hunting around the last cases of infected wild boar detected, lacked coordination, and checks on the effectiveness of the measures adopted to ensure their adequacy, in particular for the control of the local wild boar population, or safe handling of shot wild boar, were incomplete.

Biosecurity requirements were applied in the places visited: some of them are challenging for the backyard holdings. The whole system is weakened to some extent by the lack of clear written instructions for pig keepers and the hunters on the measures to be respected, and the lack of a list of officially approved disinfectants (both for the farmers, or official veterinarians, to ensure that they

13 In their response to the draft report, the Competent Authority indicated that updated and corrected leaflets were issued in July 2014, that further updates (to include biosecurity requirements) were to be performed on these leaflets, and that information campaign was to be discussed at a meeting of the Sanitary-epidemiological council end of November 2014.

14 In their response to the draft report, the Competent Authority indicated that a list, prepared by the National Veterinary Institute, has been communicated in July 2014 to stakeholders, and published on the CA website.

15 In their response to the draft report, the Competent Authority indicated that appropriate procedures have been put in place after the audit to compare data of wild boars shot with data on samples taken and epidemiological forms.

use suitable products at a suitable concentration). The system will be further strengthened by verification of compliance with biosecurity requirements foreseen in the approved eradication plan.

5.4 SURVEILLANCE

Legal basis: Articles 15 and 16 of Directive 2002/60/EC, Commission Decision 2003/422/EC; article 12 of Regulation (EC) No 882/2004

5.4.1 *Surveillance in wild boar*

Surveillance measures for ASF have been strengthened in Poland since 2011. Differentiated surveillance has been performed according to a risk classification of the regions. In 2014, the eastern border regions are considered most at risk. In the whole country, all fallen wild boar must also be tested for ASF. In addition, 5 to 10% of wild boars shot in the areas bordering Ukraine must be also tested, as well as all wild boar shot in the highest risk region bordering Belarus (which includes the RA and PA).

The FVO audit team noted that:

- General and targeted information campaigns were organised by the CA. Cooperation with other authorities, including road authorities (for wild boar killed on the roads), SFA and PHA, was organised.
- In the months of April and May 2014, 19 wild boars found dead and 315 shot wild boars from the RA and PA were tested for ASF for a estimated total population of 11,500).
- The hunting pressure was recorded in log-books kept at the hunting club, and under control of the SFA. The hunting club visited indicated that interest in hunting dropped in the RA, due to the absence of outlet for this meat and of the increased costs linked to cold storage. They also indicated that result of hunting would probably be far below the hunting “bags” attributed, and that the compensation costs for crop damage to be paid by the club was likely to increase with the population of wild boar.
- The organisation of sampling and testing of all shot wild boar in principle goes beyond the requirements laid down in Section H of Chapter IV of the Annex to Decision 2003/422/EC, where only a representative number of animals per sampling area must be sampled. However, sampling areas and minimum number of samples have not been defined¹⁶.
- A standard form was developed for hunters, in order for them to deliver information required by Article 16 (3)(h) of Directive 2002/60/EC. As indicated in section 5.5.1, monitoring of the sampling of all wild boars is not strictly monitored by the VI.
- Each carcass of shot wild boar was identified with a unique number identification tag, provided by the PHA to the hunting clubs. The samples taken by the hunters were collected by the OV at the collection point in one district, who stated that he systematically inspected the carcass. The systematic inspection required by Article 15 (2)(c) of Directive 2002/60/EEC was not done in another district, where the hunters dropped the samples at the

¹⁶ In their response to the draft report, the Competent Authority indicated that the hunting plan for the 2014/2015 season, and the maintenance of hunting around cases, ensure that requirements will be met.

office while the carcasses were stored in a cold store in another district¹⁷.

- Extensive exchanges and transmission of information between the VI and PHA and SFA was presented. Training sessions were made for PHA at regional level, expecting them to perform cascade training to the hunting clubs. However, no specific instructions on sampling procedures and conservation of samples were issued for the hunters. The representative of the hunting club visited explained that he scooped liquids in the thoracic cavity with a flask to be used also for tissue sampling.

5.4.2 *Surveillance in pig holdings*

The reinforced surveillance system for pigs in the RA included initial census of pigs on holdings and reiterated visits to the holdings in the 10 km zones around the places where infected wild boar were found, monitoring of health records and mortality, enhanced clinical and laboratory investigations, enhanced ante and post-mortem inspection at slaughterhouses, and pre-movement tests for pigs, the meat of which is destined to be put on the market without restriction. Further measures are foreseen in the eradication plan, such as a set frequency of visits to holdings according to their biosecurity classification, and official ante and post-mortem examination of all pigs slaughtered on farms.

A cooperation agreement between ARMA and the VI requires the agency to notify the DVOs of reported mortality of more than 10% at holding level. Farmers are also required to report directly to the DVO all pig mortality within the RA or PA.

The FVO audit team noted that:

- One of the district offices visited had a log-book of direct reports of mortality from farmers, the other one had no record system in place.
- A standard national form for notification of on-farm slaughter is available, and the audit team saw examples of sanctions taken for non-notification at a district veterinary office. However, the form has not yet been adapted to the requirement of ante or post-mortem inspection in the RA as required under the eradication plan, which was to be performed at the keeper's expense, and no control system has been developed.
- At the slaughterhouse visited in the RA, instructions and training were received in regard to ASF. The OV of the slaughterhouse presented a suspicion of ASF reported during post mortem inspection. The investigation and control measures taken until the negative result was obtained were adequate and well documented. The laboratory result sheet for the suspicion at the slaughterhouse classified this analysis (diligently performed) as a routine test.
- The FVO audit team requested but did not receive the total number of suspect pigs investigated for ASF since the detection of the first cases in wild boar.

5.4.3 *Laboratory tests*

The National Reference Laboratory (NRL) is the only laboratory currently performing tests for ASF

¹⁷ In their response to the draft report, the Competent Authority indicated that after the audit, the rules have been modified, and the samples are now brought to the DVO competent for the place where carcasses are stored.

in Poland.

The FVO audit team noted that:

- Test reports were clear and complete. They gave test results and offered an interpretation, in particular in case of serial serological tests. The turn around time for all tests reviewed in the field was very good (up to 3 days from the date of sample submission).
- ELISA (as serological test) and PCR tests used have been within a scope of the laboratory accreditation. The NRL uses two ELISA tests: a commercial one, and one developed in-house. The NRL indicated that only the former one is accredited, and that the second one is used only as auxiliary test. The same test is accredited to be used in two departments: the pig diseases department, where it is currently performed, and the serology department, where it could be used in case of crisis.
- In case of positive or doubtful result, the NRL uses an immuno-blotting method as confirmation test. If this tests is also positive, an immuno-peroxydase method is used. These last two methods had been validated, and were under the process of accreditation. The NRL presented a successful participation in the ring-tests organised by the EU-RL for these two methods in 2013.
- The type of tests used were in accordance with the EU diagnostic manual, except for surveillance of wild boars when majority of the samples taken were analysed only virologically and not for ASF specific antibodies. This had been recently corrected, and serological monitoring is to be more systematically performed at least in the high risk areas, in line with the requirement of Chapter IV, section H of Decision 2003/422/EC.

Conclusions

The effective surveillance in wild boars benefits from a clear framework, extensive collaboration and awareness campaigns, and results in significant reports and testing of wild boar found dead. However, the absence of minimum target numbers will make the monitoring of the surveillance difficult, and prevent a timely reaction should the hunting pressure remain insufficient.

The required official inspections of the carcasses were not systematically ensured, but this weakness was mitigated by the systematic sampling and testing required, based on the good collaboration of the hunters. As indicated in the previous chapter, the monitoring by the CA of the sampling of all wild boars shot was not fully ensured.

The absence of data on the samples from suspect pigs sent for laboratory analysis makes it difficult to assess the intensity of passive surveillance. Such data from the laboratory may not reflect the reality, due to the possibility of incorrect classification in the laboratory database.

The request for inspection of pigs for on-farm slaughter under the eradication plan is a very valuable tool in the surveillance of the backyard pig population. However the measure is not ready for implementation in the absence of clear requirement, undertaking and control, and being at the expense of the keepers.

On the contrary, evidence of reinforced surveillance activities in the commercial sector gives a good level of confidence that the presence of the disease would be rapidly detected in this sector.

The operational standards of the laboratory involved in surveillance were good. Quality elements for the confirmation methods for serological surveillance are in place, but a full accreditation for such methods are missing.

5.5 TRACEABILITY OF MEAT, MEAT PRODUCTS AND BY-PRODUCTS

Legal basis: Commission implementing decision 2014/178/EU; Council Directive 2002/99/EC; Annex II, section III of Regulation (EC) No 853/2004; Regulation (EC) No 854/2004.

5.5.1 Traceability of wild boar meat

The Polish MARD Regulation 420 of 31/03/2014 requires meat of wild boar from RA (and products derived of) to be marked with a pentagonal mark after negative laboratory test results, in order not to be dispatched from the RA. In line with Decision 2014/178/EU, the meat of wild boars from the PA can be marketed within Poland if the animals are tested negative for ASF. In such cases, the meat must bear a round health mark, which limits its use to establishments of marginal, localised and restricted activity.

The FVO audit team noted that:

- All wild boars in the RA were exclusively used for own consumption. Not all carcasses inspected by an OV (for more see chapter 5.4.1).
- The wild game processing establishment visited by the audit team processed carcasses of wild boars coming from the protection area as well from the free area. All meat produced was put on the market using the same round health mark, avoiding the necessity of channelling. This was a decision taken by the food business operator. The CA stated that should an establishment wish to operate a dual system, they would assess the possibilities of clear separation of activities to allow it.
- All relevant checks and controls were performed at the game processing establishment, and all of them were documented, except the check on origin. The food business operator, the veterinarian performing official controls at the establishment, and the OV collecting samples for their shipment to the laboratory indicated that they all checked that the documents accompanying the carcasses identified a hunting ground located in the PA (maps of hunting grounds were available on internet in case of need). There was no direct link between the identification of the carcass and the identification of the sample, but the number of carcasses processed at the same time was limited, and the cold stores were managed on a all-in/all-out basis: if one sample had returned positive the CA stated that the whole batch would be destroyed. Offal were stored until negative results were obtained, before being processed as category II material.

5.5.2 Traceability of pig meat

MARD regulation 420 of 31/03/2014 defines that fresh meat and products thereof derived from pigs originating from the RA, which are not to be dispatched to countries other than Poland (in accordance with Article 9(1) and 14 of Decision 2014/178/EU) be marked with a round health mark.

A derogation system, in line with Article 9(3) of Decision 2014/178/EU has been put in place, with

pigs complying with conditions set out in Article 3 of the same decision. Practically, the conditions of Article 3(2) will only be applicable once the measures of the eradication are fully implemented. At the moment, all pigs to be slaughtered under these conditions had to fulfil the conditions laid down in Article 3(1) (sampling within 15 days of movement, clinical examination on the date of the movement). In addition, the vehicles must be officially sealed before leaving the holding of origin¹⁸.

All such pigs were sent to slaughterhouses outside the RA, either directly, or through collection centres. The mode of operation and official supervision of such collection centres have been detailed in MARD regulation 420 of 31/03/2014. Eight such collection centres were operating in the RA.

The FVO audit team noted that:

- Two slaughterhouses, located in the RA, slaughter pigs and produce carcasses subject to prohibition of dispatch to other Member States and third countries, as foreseen in Article 9(1) of Decision 2014/178/EU. Both were using exclusively the round health mark for the pigs slaughtered in their premises.
- The CA indicated that carcasses with such health mark would only be distributed to establishments of marginal, localised and restricted activity, or to establishments using national adapting measures (or to retailer) : in any case, to processing establishments which do not need further official controls, as they cannot produce concurrently meat or products for the EU market (restrictions laid down in MARD Regulations of 8/06/2010 and 19/05/2010).
- Regarding meat benefiting from the derogation foreseen in Article 9(2) of Decision 2014/178/EC, pigs were slaughtered in slaughterhouses located outside the RA. Guidelines were issued by the CA on how to perform sampling (pending the adoption of the eradication plan) and inspection of the pigs originating from the RA for slaughter. In addition training sessions had been organised at regional and local level. Model certificates have been made available by the CCA, where the OV can declare whether the pigs sent to the slaughterhouse comply or not with the conditions for unrestricted marketing.
 - In the holding visited by the audit team, the total number of pigs had not been taken into consideration by the OV for the determination of the sampling size, leading to a reduction in the sample size compared to the instructions.
 - The clinical inspections were not documented. All OVs interviewed indicated that, contrary to the guidelines and the requirements of Part A of Chapter IV of the Annex to Decision 2003/422/EC, they would not make any temperature check on pigs, unless they noticed suspicious clinical signs.
- The guidelines for operation of the collection centres do not detail the maximum residency time of pigs, or the conditions for approval. Practically, operations were performed with the continuous presence of an OV, and pigs remained a few hours on the premises. The two premises visited were exclusively operating as collection centres for pigs of the same health status, destined for slaughter. Whereas one collection centre had a satisfactory operational

¹⁸ In their response to the draft report, the Competent Authority indicated that this measure was introduced only to comply with implementing Commission Regulation (EU) No. 324/2014 of 28 March 2014, approving exceptional measures for the pigmeat market in Poland, which was valid until 25 May 2014.

mode, the other one presented serious deficiencies in terms of traceability (incoming vehicles not sealed, no notification of the transit on registers or to the database), which had been partially corrected recently by an additional indication of the transit, on the certificate.

- Contrary to the requirement of point 3(a) of Section III of Annex II to Regulation (EC) No 853/2004, the food chain information sent by farmers from the restricted area did not contain any information on the regional health status of ASF. The forms contained a field where the farmer had to indicate if any animal health restriction applied: all forms from the RA checked by the audit team stated that no restrictions applied (although they were accompanied by the official certificates). The CA did not issue any instruction on the matter, and the OV at slaughterhouses did not consider it as a matter of importance. When pigs are sent from areas other than the RA, the only sanitary document accompanying the consignment is the food chain information.
- A DVO from the RA indicated that, at the beginning, he received notifications from OVs in slaughterhouses regarding the quality of the certification, but that things had improved later. At the slaughterhouse visited, the OV did not identify any issue with the certificates. However, a number of those reviewed by the FVO audit team were incorrectly filled. Some of them did not indicate whether the pigs complied or not with the requirements for unrestricted marketing. On request of the FVO audit team, the CA provided evidence of the pre-movement tests of the pigs.
- The CA indicated that no processing establishment was currently using provisions of Article 11 of Decision 2014/178/EU (in compliance with article 4(1) of Directive 2002/99/EC). Such procedure was however used, as a national precaution measure, when the first case in wild boar was detected. A plant was visited and approved by the CA, in order to process the carcasses of pigs which were in the slaughterhouses in the RA at that time. Extensive documentation of the process was available (from the visit and checks prior to approval of the plant, to marking and traceability of carcasses sent to the processing plant).

Conclusions

The system in place for eligibility, restriction and traceability of wild boar meat from the PA destined for the national market, and its application, give a good level of confidence on the respect of the requirements, and therefore of the safety of this commodity.

An effective channelling of pigs slaughtered for commercial use in the RA was in place, in order to avoid the dispatch of their meat or meat products to other Member States, and to restrict them to local consumption.

Pigs from the RA destined to be slaughtered for unrestricted marketing were consistently subject to laboratory testing and examinations, albeit with some shortcomings regarding the standards applied for clinical examination and determination of sampling size: the guarantees requested by EU legislation are given, but not with the intensity required. The official controls at the slaughterhouse were insufficient to detect that some certificates were issued without any guarantee that the pigs complied with the health requirements (although the status of the meat was not affected in the case seen).

The lack of enforcement of the accuracy of the food-chain information related to animal health restrictions reported by the farmers for pigs from RA deprives the CA of a valuable element that

could confirm that the farmers are aware and acknowledge the restrictions in place.

6 OVERALL CONCLUSIONS

Surveillance and control activities in relation to African swine fever are a clear priority for the Polish Competent Authorities. The comprehensive system adopted for control of wild boar in the restricted area, if this system will be further monitored by the Competent Authority, can bring a good degree of confidence in the management of the risk linked to hunting activities, while ensuring adequate surveillance and safety of this meat.

The adoption of biosecurity measures remains a challenge in a context of numerous backyard holdings in the restricted area. The activities implemented have reinforced awareness on biosecurity and improved the knowledge on such holdings in order to prevent the spread into this population, but controls were insufficient. The existing official pig movement and registration system (managed by one Competent Authority) has not been used to manage the African swine fever controls. Instead a parallel ad-hoc system has been put in place by the Competent Authority but this system has limited potential as an effective tool for animal health controls. Surveillance of domestic pigs in the restricted area is implemented, but is affected by the lack of control of the inspections performed on on-farm slaughter. In summary measures to prevent African swine fever from spreading into domestic pigs in the infected area have been implemented, however the system in place needs to be further strengthened, in particular by implementation of official controls to verify its effectiveness as required by Article 15(2)(a) of Council Directive 2002/60/EC.

The system in place for definition of the eligibility, restriction, and traceability of meat from wild boar or pigs from the protective area to the national market is effective. The system for marking pig meat from the restricted area eligible for the EU market is defined and applied largely in line with the requirements, but insufficiently controlled. Overall, the system is able to prevent the spread of African swine fever outside the restricted area via such meat and meat products. No movement of live pigs outside the restricted area has occurred (other than for direct slaughter), and no semen collection centre is located in this area.

7 CLOSING MEETING

During the closing meeting held in Warsaw on 13 June 2014, the audit team presented the main findings and preliminary conclusions of the audit to the CA. The CA did not indicate any major disagreement. They indicated that they were aware of the risks links to the decrease hunting pressure in the RA, and were planning to introduce a financial incentive.

8 RECOMMENDATIONS

The CA of Poland are invited to submit an action plan describing the actions taken or planned in response to the recommendations of the report, and setting out a timetable for their completion, within 25 working days of the report.

N°.	Recommendation
1.	To ensure that resources are hired and deployed effectively so all activities related to control and eradication can be performed. Article 4(c) of Regulation (EC) No 882/2004
2.	To ensure traceability of all pig movements and proper completion of any accompanying documents (including movements to slaughterhouse in areas not under restriction).Article 5(2) of Council Directive 2008/71/EC
3.	To ensure effective coordination and cooperation between VI and ARMA in order to improve the accuracy and quality of the tools for traceability of pigs, in order for them to be effective tools for animal health controls. Article 4 of Directive 2008/71/EC, Article 18 of Directive 64/432/EEC, Article 15/2(b) of Directive 15 of Directive 2002/60/EC, Article 9 of Regulation (EC) No 882/2004
4.	To ensure that all feral pigs shot are inspected by an official veterinarian and examined for ASF, including for serological monitoring, as indicated in the eradication plan.Article 15(2)(c) of Directive 2002/60/EC
5.	To define the sampling areas and minimum animals to be sampled in each area in line with requirements of Chapter IV, point H of Decision 2003/422/EC, and to apply measures to maintain the wild boar population stable, as indicated in the approved eradication plan. Article 16 of Directive 2002/60/EC
6.	To ensure that all pigs slaughtered on-farm in the restricted zone are subject to official ante- and post-mortem inspection, as foreseen in the approved eradication planArticle 16 of Directive 2002/60/EC
7.	To ensure that the standards defined in Article 3(1) of Decision 2014/178/EU are applied for sampling procedure and clinical examination when this alternative is selected for the derogation of prohibition of dispatch of fresh pigmeat to other Member States and third countries.Article 9(3) of Decision 2014/178/EU
8.	To ensure that all confirmation serological tests used for ASF are within the scope of ISO 17025 accreditation. Article 12(2)(a) of Regulation (EC) No 882/2004
9.	To ensure that inspection tasks of official veterinarians in the slaughterhouses include checks on food chain information, and that appropriate action is taken if the information does not correspond to the true situation on the holding of originArticle 5 of Regulation (EC) No 854/2004, and Section II, Chapter II (5) of Annex I to this Regulation
10.	To ensure that the expert group assist the CA in all tasks foreseen in Article 15 (2)(a) of Directive 2002/60/EC, including establishing possible suspension of hunting, and carrying out checks to verify the effectiveness of the measures adopted.

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_inspection_ref=2014-7294

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
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
Reg. 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of 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. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
Dir. 64/432/EEC	OJ 121, 29.7.1964, p. 1977-2012	Council Directive 64/432/EEC of 26 June 1964 on animal health problems affecting intra-Community trade in bovine animals and swine
Dir. 96/93/EC	OJ L 13, 16.1.1997, p. 28-30	Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products

Legal Reference	Official Journal	Title
Dir. 2002/60/EC	OJ L 192, 20.7.2002, p. 27-46	Council Directive 2002/60/EC of 27 June 2002 laying down specific provisions for the control of African swine fever and amending Directive 92/119/EEC as regards Teschen disease and African swine fever
Dir. 2002/99/EC	OJ L 18, 23.1.2003, p. 11-20	Council Directive 2002/99/EC of 16 December 2002 laying down the animal health rules governing the production, processing, distribution and introduction of products of animal origin for human consumption
Dir. 2008/71/EC	OJ L 213, 8.8.2008, p. 31-36	Council Directive 2008/71/EC of 15 July 2008 on the identification and registration of pigs (Codified version)
Dec. 2000/678/EC	OJ L 281, 7.11.2000, p. 16-17	2000/678/EC: Commission Decision of 23 October 2000 laying down detailed rules for registration of holdings in national databases for porcine animals as foreseen by Council Directive 64/432/EEC
Dec. 2003/422/EC	OJ L 143, 11.6.2003, p. 35-49	2003/422/EC: Commission Decision of 26 May 2003 approving an African swine fever diagnostic manual