EUROPEAN COMMISSION
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Directorate F - Food and Veterinary Office

Ares(2015)1450568

DG(SANCO) 2014-7049 - MR FINAL

FINAL REPORT OF AN AUDIT

CARRIED OUT IN

POLAND

FROM 22 TO 26 SEPTEMBER 2014

IN ORDER TO EVALUATE THE ANIMAL HEALTH CONTROL SYSTEM IN PLACE FOR BODIES, INSTITUTES OR CENTRES APPROVED IN ACCORDANCE WITH ANNEX C OF COUNCIL DIRECTIVE 92/65/EEC

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 22 to 26 September 2014.

The objective of the audit was to evaluate the effectiveness of the animal health controls in place in relation to bodies, institutes or centres approved in accordance with Annex C to Council Directive 92/65/EEC. Overall, the report concludes that:

The competent authority has been working to align official controls in this area with Union requirements following attendance by representatives of General Veterinary Inspectorate at "Better Training for Safer Food" training on this issue in 2011. Progress has been made as demonstrated by their review of approved body, institute or centre (ABIC) compliance and the subsequent reduction in the number of ABICs from around 380 in 2012 to 69 at the time of the audit.

There is a framework of official controls in place for ABICs but the assurances given do not yet meet the standards expected by Directive 92/65/EEC. No central guidance is available for initial approval or on the requirements for maintenance of approval. This, coupled with the fact that District veterinary officers may only have a small number (e.g. one or two) ABICs to supervise make it difficult for them to build expertise in this area as stand- alone units. Similarly, no Regional Veterinary Office guidance exists to ensure consistent oversight of implementation and reporting at national level.

The standards of animal health surveillance in ABICs visited did not fully meet the requirements of Directive 92/65/EEC. The surveillance plans tended to focus on a very limited number of notifiable diseases in the context of this Directive and thereafter on routine general health issues. When the plans did refer to diseases listed in Annex A of the Directive there was no quantification of surveillance requirements or actions to take on suspicion of a notifiable disease.

The delayed actions in suspending approval following suspicion of disease, the very limited surveillance carried out to confirm absence of disease and lack of amendments to surveillance plans following confirmation of disease indicate a misunderstanding by ABIC and competent authority as to what the disease surveillance plans should focus on i.e. to concentrate on the surveillance for and control of Annex A diseases.

Directive 92/65/EEC allows animals to be exchanged between European ABICs in a relatively unrestricted manner (e.g. no quarantine requirements). There remains some uncertainty in the health status of Polish ABICs with consequential risks to the health status of their trading partners and livestock farming.

While the majority of movements are controlled, some shortcomings do exist relating to the supervision of trade control measures and the knowledge of those carrying out post movement controls. These include the non- detection of irregular movements of primates into Poland as well as such moves undergoing post movement controls without the inspection officers realising they shouldn't have taken place. These findings together with their geographical distribution reduces the confidence in trade control measures.

Overall, no immediate health risk was identified.

Recommendations are made to the competent authorities in Poland to address the shortcomings described in the report.

Table of Contents

Abbreviations and definitions used in this report

Abbreviation	Explanation
ABIC	Approved body, institute or centre: *establishment where animal species are kept or bred, either for the display of animals and education of the public, or for conservation of the species, or for basic or applied scientific research or breeding of such animals for such research, and approved according to Directive 92/65/EEC*
BTSF	Better Training for Safer Food
CA	Competent Authority
CVO	Chief Veterinary Officer
DVO	District Veterinary Officer
EU	European Union
FVO	Food and Veterinary Office
RVO	Regional Veterinary Office
TRACES	TRAde Control Expert System, a trans-European network for veterinary health notification and certification.

1 Introduction

This audit took place in Poland from 22 to 26 September 2014, as part of the planned audit programme of the Food and Veterinary Office (FVO). The audit team comprised 3 FVO auditors. At the opening meeting on 22 September the team confirmed the objectives and scope of the audit as well as the itinerary.

The FVO audit team was accompanied by a representative from the central competent authority, the General Veterinary Inspectorate.

2 Objectives

The objective of the audit was to evaluate the effectiveness of the animal health controls in place in relation to bodies, institutes or centres approved in accordance with Annex C to Council Directive 92/65/EEC (ABICs) and in particular:

- The assurances given by the official controls regarding the compliance of approved bodies, institutes and centres with applicable requirements;
- The standards of animal health surveillance and control measures applied in these establishments in relation to the objectives of applicable legislation;
- The conditions for movements of animals to and from these establishments, and their traceability;
- The specific arrangements in place for the introduction of animals from third countries to approved bodies, institutes or centres.

The scope focused on bodies, institutes and centres keeping animals susceptible to the diseases listed in annex A to Directive 92/65/EEC, including arrangements in place when such establishments keep also ungulates of species referred to in Directives 64/432/EEC, 91/68/EEC and 2009/156/EC. The evaluation of the system for introduction from third countries focused on animals for which harmonised rules are in place (in line with Directives 92/65/EEC, 2004/68/EC, or 2009/156/EC).

The organisation of the competent authorities, their operational criteria and performance in this sector was assessed according to the standards laid down in Regulation (EC) No 882/2004.

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

Visits	Number	Comments
Central Competent Authority	3	Opening, clarification & closing meetings
Regional and local Competent Authorities	2	Wroclaw and Poddebice
Approved bodies, institutes and centres	4	3 zoos and 1 research centre

3 Legal Basis

The audit was carried out under the general provisions of EU legislation and, in particular 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.

A full list of the EU legal instruments referred to in this report is provided in Annex I. EU legal acts quoted in this report refer, where applicable, to the latest amended version

4 Background

This audit is one in the first series of audits from the European Commission on this topic. It was selected on the basis that animals traded to and from ABICs can be carriers of animal diseases which, transmitted via direct or indirect contact, can have serious consequences for livestock farming, zoo populations and human health (zoonoses).

Article 2 of Directive 92/65/EEC (hereafter the Directive) defines approved bodies, institutes or centres as establishments where animal species are kept or bred for one or more of the following purposes: display of animals and education of the public, conservation of the species or basic or applied scientific research or breeding of animals for the purposes of such research.

Conditions for approval and official supervision of these ABICs are detailed in Annex C to the Directive and compliance with these conditions should ensure that ABICs have a high animal health status and biosecurity standard.

The intra-Union trade of a number of animal species covered by the Directive must be subject to production of a health certificate delivered by the competent authority (CA). Article 13 of this Directive foresees that trade in most animals to and from ABICs shall be subject to production of a transport document completed by the veterinarian responsible for the ABIC of origin. In other words, ABICs can exchange animals between themselves in a relatively unrestricted manner if they comply with the Directive.

5 Findings And Conclusions

5.1 Legislation and competent authorities

Legal requirements

Articles 4 to 8 of Regulation (EC) No 882/2004; Article 291 of the Treaty on the Functioning of the European Union.

Findings

5.1.1 Legislation

A Polish Act dated 11 March 2004 for the protection of animal health and control of infectious animal diseases (Official Gazette 2008.213.1342) sets out the veterinary requirements for, inter alia, the keeping or breeding of animals for the purpose of exhibition, education, protection and conservation of animals and the performance of basic or applied scientific research or breeding of animals used for such research.

A Regulation of the Minister for Agriculture and Rural Development (Official Gazette 2005.37.332)[1] partially implements the Act and transposes Directive 92/65/EEC. This includes reference to Annex A notifiable diseases in the context of the Directive and lists Annex B diseases for which a national programme may be recognised under the Directive.

The CA confirmed that they did not apply requirements of the Directive to domestic bovine, swine, ovine, caprine or equidae in ABICs. Instead, the requirements of Directive 64/432/EEC, Directive 91/68/EEC and Directive 2009/156/EEC were applied.

5.1.2 Competent authorities

The Veterinary Inspection is headed by the Chief Veterinary Officer and responsibilities include controls on animal health. The Veterinary Inspection is operationally divided into General Veterinary Inspectorate, 10 Border Veterinary Inspectorates, 16 Voivodships (Regions) and then 305 Poviats (Districts).

The structure and organisation of the CA, as well as the control system for animal health is described in the Country Profile of Poland at :

http://ec.europa.eu/food/fvo/controlsystems_en.cfm?co_id=PL

No central guidance has been issued on how to apply the Directive – the CVO considers that no guidance is required and implementation of the Directive has been left to the DVO to individually progress. At DVO level, there was similarly no guidance on how to apply the Directive.

Conclusions

There is a framework of official controls where ABICs are under the control of an official veterinarian. These controls have not yet reached the levels of assurance required by Directive 92/65/EEC and the lack of documented procedures is not in accordance with Regulation (EC) No 882/2004, Article 8(1).

5.2 Approval of bodies, institutes and centres

Legal requirements

Article 13 of Directive 92/65/EEC; Annex C to Directive 92/65/EEC.

Findings

5.2.1 Listing of approved bodies, institutes and centres

Since 2012 the CA has reduced the number of ABICs from around 380 in 2012 to 69 at the time of the audit. This was a consequence of attendance by General Veterinary Inspectorate staff at “Better Training for Safer Food” training on health of zoo animals and instruction from the CVO requesting verification of the correct approval of ABICs by the end of 2013 (subsequently extended until June 2014).

All ABICs are allocated a unique veterinary approval number, in line with the requirements in the Directive, in the format wwxx62zz which corresponds to region, district, type of premises (62 equates to ABIC) and actual entity /body and is in line with the numbering system used for all types of entities in Poland. This is based on national legislation and ensures unique allocation of approval numbers.

1 In their response to the draft report the competent authority noted that this Regulation is no longer in force and has been replaced by the Regulation of the Minister for Agriculture and Rural Development of 15 january 2015 on detailed veterinary reqirements applicable to certain species (Journal of Laws 2015, item 98)

Any change to these veterinary approval numbers requires a District Veterinary Office's decision to be issued. The FVO team were informed that all ABICs which had their approval withdrawn since 2012 should have received such notification.

There is a legal requirement (Dz.U.2012.128) to provide monthly update of all entities, including ABICs, to the CVO – this is done by District Veterinary Officers (DVOs) via Regional Offices – and this information provides the basis for compliance with maintaining a publicly available list of ABICs in Poland.

5.2.2 Procedures and conditions for approval

District Veterinary Inspectorates are responsible for initial approval and maintenance of approval in ABICs. In the three regions visited by FVO team these responsibilities were either carried out directly by DVOs or by official veterinarians.

Representatives of General Veterinary Inspectorate attended "Better Training for Safer Food" training on zoo animals in 2011. This was followed by two sessions of cascade training delivered to regional and divisional staff. Two of the three official veterinarians involved in this FVO audit and directly involved in ABIC supervision received cascade training from other attendees.

Each of Districts visited had a small number of ABICs (typically one or two).

ABICs visited by FVO team had received an annual visit by DVO to maintain approval. The FVO team noted that reports generated at these visits ranged from a checklist (based on generic proforma used for all approved activities in Poland) and adapted individually by DVO with the Directive's requirements through to a narrative report. When the checklist was used, it was not possible to verify how the audit was performed or what it covered, which is not in line with Regulation (EC) No 882/2004 article 9(2).

The Regional Veterinary Office (RVO) is responsible for supervision of DVO activities in all work areas. There is no central guidance relating to how this should be carried out in ABICs. From 2013, the CVO instructed regions to perform their supervisory activities on a district basis and to inspect all activities there-in (including ABICs). None of districts visited by FVO audit team had been inspected by the RVO under this new regime – notwithstanding, two ABICs visited during the audit had received standalone RVO supervisory visits in 2014 with the production of a final report and recommendations. In one RVO report (May 2014) recommendations to DVO included the need to cover all requirements of Annex C to the Directive and to ensure cleansing and disinfection procedure was documented for quarantine facilities.

To date, no internal or external audit of this official control has been carried out in Poland.

Conclusions

The correct maintenance of the approval conditions is ensured through DVO audits but the quality of these audits is limited by the small number of ABICs DVOs are responsible for and the absence of guidance - this also limits the opportunity to develop expertise in this area. Although supervision on DVO activities from RVO contribute to improve the controls on ABICs, it still plays a small role as supervisory activities are not systematically carried out.

The fact that reports on DVO checks on ABICs do not always include all the necessary information, makes it difficult to effectively supervise or audit the activities performed by DVO on ABICs.

5.3 Disease surveillance and control measures

Legal requirements

Annex A, and C to Directive 92/65/EEC; Decision 2007/598/EC; Chapter 5.9 of the 2013 World

Organisation for Animal Health Code.

Findings

5.3.1 Approved veterinarian

All ABICs had at least one veterinarian appointed as required by Directive 92/65/EEC. However, CA had no legal framework to approve these veterinarians and to confirm that they possessed the skills necessary for this particular field of animal health – as required by Directive 92/65/EEC Annex C,1(g)(i)

Contracts of employment were seen at one of the ABICs visited while in another, they had not been drafted.

5.3.2 Disease surveillance and prevention

All zoos visited had an annual disease surveillance plan which had been approved by DVO. The disease surveillance plans are not designed to provide evidence of absence of Annex A diseases and were not amended when changing risks were identified e.g. a case where tuberculosis (*M. Bovis)* was confirmed did not result in increased surveillance, there was no epidemiological study to determine source of infection and the decision to remove suspension of approval was based on limited test results (e.g. one testing round of five contact animals only).

To a large extent the plans concentrated on routine health issues such as worming, hoof trimming and vaccination regimes for non-Annex A diseases. When Annex A diseases such as tuberculosis or brucellosis were mentioned, no quantitative targets were set so it was not possible to assess implementation of the plan. There was minimal sampling of asymptomatic animals to get an indication of the disease / subclinical disease status in ABIC.

There is daily health monitoring of animals by keepers with notification to approved veterinarian if any clinical health issues are identified.

Post mortem examination, as required by the Directive, was carried out almost exclusively by the approved veterinarian and pathological samples were sent to laboratories for further examination and tests when considered necessary by him/her. The FVO team noted one case of abortion in an ABIC when the authorised veterinarian did not consider it necessary to submit samples for diagnostic purposes for e.g. brucellosis – the justification being there had never been a case on site before.

Importation of a bird from Israel did not result in review of the disease surveillance plan to consider possible risks e.g. to acknowledge disease situation in country of origin or that all zoo birds in Israel must be vaccinated against Newcastle disease- which would be a complication if this bird was subsequently tested for antibodies to Newcastle disease.

One ABIC confirmed that its disease surveillance plan had not changed in last three years.

5.3.3 Disease surveillance and control of bovine, ovine, caprine, porcine animals and equidae

The CA confirmed that national disease control programme for tuberculosis and brucellosis did not include zoo animals – any testing is carried out at the discretion of the approved veterinarian and funded by the ABIC. Any testing performed was generally carried out when the animals were immobilised for other procedures (a major cost for testing is the immobilisation of animals to facilitate handling).

5.3.4 Quarantine operations

The infrastructure and documentation was reviewed at the ABICs visited. No animals were being quarantined at these sites during the audit.

The standard of quarantine logs kept ranged from recording only the date of entry/exit with no individual animal identification or observations through to individual animal log containing individual identification, date in/out and daily clinical observations - these were all considered acceptable documentation by supervising officials.

In one ABIC, a DVO authorisation for the import of a bird, including animal health requirements (veterinary certification with specific disease attestations required by Directive 92/65/EEC, Article 7) was seen.

It was not possible to verify whether personnel access to quarantine facilities was restricted to essential staff as no records were kept for movements of personnel in/out of quarantine.

In one facility, access to an outside run could allow direct contact of quarantined animals with other animals.

In two establishments, facilities were constructed (or part constructed) in wood making it difficult to cleanse and disinfect at the end of quarantine period.

5.3.5 Official visits to ABICs

ABICs visited by FVO team had received an annual visit by DVO to maintain approval.

The CA has chosen to issue all intra trade certificates from ABICs rather than allowing the approved veterinarians to complete them thereby increasing the frequency of official veterinarian's presence in ABICs throughout the year.

5.3.6 Action in case of suspicion or confirmation of a notifiable disease

The FVO team reviewed two notifications to CA of suspicion of Annex A diseases. In both cases, there was a delay by ABIC in alerting CA of suspicion, contrary to the requirements of Directive 92/65/EEC, Annex C,1.(g)(iii)) and then a delay by CA in suspending ABIC approval.

The first notification referred to a European bison which died and the post-mortem examination gave suspicion of tuberculosis. The CA stated (no documentation seen) that DVO was alerted immediately resulting in an informal restriction on movement of bovidae and no intra trade certificates issued for bovidae in this period. The official suspension of approval for bovidae took place two weeks later, when the DVO received laboratory confirmation of *M.bovis*. Not all susceptible animals were tested for tuberculosis: five contact European bison were tested (intradermal tuberculin (eyelid) and gamma interferon) – all gave negative results, but it was not considered necessary to test two groups of ungulates (American bison and Oryx) in adjacent compounds. Cleaning and disinfection of hardstanding was carried out and surface soil of European bison compound was removed and new topsoil laid. There was no written epidemiological report available and the source of infection was undetermined. The approval for bovidae was restored five months after the confirmation of the disease based on one round of testing of five contact European bison and cleansing and disinfection of their compound.

The second notification referred to a camel that was tested for tuberculosis due to a decline in its health. The intradermal test was positive and zoo notified DVO of suspicion 12 days later. The DVO suspended the approval for camelidae only after the zoo euthanised the animal and tests gave

a positive gamma interferon result. Two and a half months after euthanasia of the animal, microbiological culture gave negative results and the DVO restored approval for camelidae.

Conclusions

The disease surveillance and control measures do not fully meet the requirements of Directive 92/65/EEC. There remains some uncertainty in relation to the health status of the ABICs with consequential risks to the health status of their trading partners and livestock farming.

The minimal sampling of asymptomatic animals to get an indication of the disease and subclinical disease status in ABIC - even following suspicion and confirmation of Annex A disease- together with the absence of quantitative targets makes it impossible to assess the true animal health disease status of ABICs. Annual endorsement of these disease surveillance plans by DVO highlights that there is a misunderstanding as to the purpose of the plans.

The fact that CA suspends the ABIC approvals on confirmation on the disease instead of on suspicion and the delays noted would have a very significant impact in the ability to prevent /limit transmission of a more contagious Annex A disease.

The findings related to disease surveillance plans – such as concentrating on routine health issues rather than Annex A diseases, limited surveillance following confirmation of Annex A disease, no attempt to diagnose cause of abortion – indicate that the approved veterinarians do not have sufficient knowledge or skills in this area of animal health to perform their duties effectively.

5.4 Movement of animals

Legal requirements

Commission Regulation (EC) No 1266/2007; Articles 5 and 13 and Chapter III of Directive 92/65/EEC; Annex C to Directive 92/65/EEC; Directive 96/93/EC; Article 4 (2) and 9 of Directive 90/425/EEC; Article 3a of Regulation (EC) No 206/2010; Commission Decision 97/794/EC; Regulation (EC) No 1760/2000; Regulation (EC) No 21/2004; Regulation (EC) No 504/2008; Article 8 of Directive 91/496/EEC; Article 4 of Commission Regulation (EC) No 282/2004.

Findings

5.4.1 Identification of animals and movement registers

The larger ABICs used a web based zoological information management system (ZIMS) to keep up to date records of the number, identity, age, sex, species of animals on site, the movements of animals in/out of site and medical records of animals.

The smaller ABIC visited had a more basic register which did not fulfil the requirements in Annex C, (d) (i) to the Directive as they only recorded species and animal numbers held on site in addition to a manual record of medical treatments which did not correlate to individual animal identification.

5.4.2 National movements

There is no requirement for health certificates for national movement of animals from ABICs to private individuals. The FVO team noted different approaches ranging from the approved veterinarian certifying the animals as being clinically healthy and fit for transport prior to such a move through to the animal being accompanied solely by an invoice.

5.4.3 Intra-Union trade

Under the Polish legal system, a health certificate in animal trade can only be issued by official veterinarians, in accordance with Article 26 of the Veterinary Inspectorate Act of 29 January 2004.

This approach ensures the CA is aware of movements out of ABICs and facilitates CA updating of the Trade Control Expert System (a trans-European network for veterinary health notification and certification- TRACES).

The FVO team noted the following issues relating to OVs completion of consignee details for animal trade originating in Poland :

- Not all official veterinarians were aware of the DG SANCO website listing ABICs in other member states.

(http://ec.europa.eu/food/animal/approved_establishments/establishments_vet_field_en.htm)

- Some official veterinarians depended on information provided by a third party to confirm the ABIC status of consignee rather than receiving confirmation directly from relevant CA. The FVO team do not consider this information to be verifiable and that it indicates an incomplete understanding of the requirements of Directive 96/93/EC.
- The use of TRACES to provide a list of approved bodies in a country without knowing the limitations of this approach insofar as TRACES lists do contain data which has not been validated e.g. entered by business operators.

The FVO team identified four intra trade certificates for movements of primates from the Netherlands, Germany, France and Czech Republic to three entities in Poland where the consignee was not listed on published ABIC list for Poland. The CA confirmed that the entities were not at the time of movement or at the time of the audit on ABIC list.

For two of the moves, local veterinary inspectors had carried out a post movement control and confirmed satisfactory documentary, identity, physical and welfare checks - despite the fact that primates should only move between ABICs and that this particular entity (where both checks were carried out) was not an ABIC.

The individual findings relate to four separate regions and were not previously identified by CA.

5.4.4 Imports

Procedures are in place for the importation of non-harmonized species. This requires authorisation by the CVO who specifies the animal health requirements that must be met. The authorisation is sent to the border inspection post appearing as the first border crossing point into the EU indicated in the application for authorisation – this allows them to verify the veterinary conditions laid down therein.

In the case of a border inspection post outside Poland, a copy of the authorisation is sent to the chief veterinary officer of that Member State with an explanation of the veterinary conditions for the importation of animals covered by the authorisation.

Examples of authorisation for import of specific pathogen free rodents were reviewed by the FVO team and were considered to be in compliance with written procedures for non-harmonized species.

The Polish CA consider that the import of birds do not have to follow this procedure as they are detailed in The Regulation of the Minister for Agriculture and Rural Development(Official Gazette 2005.37.332) which reflects the requirements of Directive 92/65/EEC Chapter II.

5.4.5 Harmonized species

Poland has not established a list of bodies, institutes or centres in third countries from which ungulates may be introduced. There has been no importation of ungulates into ABICs in Poland following the entry into force of Regulation (EU) No 780/2013.

Conclusions

The control system for import of non-harmonised animals into Poland gives assurance of the health status of these imported animals - including when they enter Poland via another Member State.

The shortcomings detected in intra trade certification - including dependence on a third party to provide ABIC status of consignee for certification purposes, controls on movement of animals into Poland not detecting irregular movements of primates and when controls are carried out, a failure to realise that certain movements should not be taking place -collectively, reduce confidence in the supervision of trade control measures.

6 Overall Conclusions

The competent authority has been working to align official controls in this area with Union requirements following attendance by representatives of General Veterinary Inspectorate at "Better Training for Safer Food" training on this issue in 2011. Progress has been made as demonstrated by their review of ABIC compliance and the subsequent reduction in the number of ABICs from around 380 in 2012 to 69 at the time of the audit.

There is a framework of official controls in place for ABICs but the assurances given do not yet meet the standards expected by Directive 92/65/EEC. No central guidance is available for initial approval or on the requirements for maintenance of approval. This, coupled with the fact that DVOs may only have a small number (e.g. one or two) ABICs to supervise make it difficult for them to build expertise in this area as stand- alone units. Similarly, no RVO guidance exists to ensure consistent oversight of implementation and reporting at national level.

The standards of animal health surveillance in ABICs visited did not fully meet the requirements of Directive 92/65/EEC. The surveillance plans tended to focus on a very limited number of notifiable diseases in the context of this Directive and thereafter on daily general health issues. When the plans did refer to Annex A diseases there was no quantification of surveillance requirements or actions to take on suspicion of a notifiable disease.

The delayed actions in suspending approval following suspicion of disease, the very limited surveillance carried out to confirm absence of disease and no amendment to plan following confirmation of disease indicate a misunderstanding by ABIC and competent authority as to the focus of the disease surveillance plan i.e. to concentrate on the surveillance for and control of Annex A diseases.

Directive 92/65/EEC allows animals to be exchanged between European ABICs in a relatively unrestricted manner (e.g. no quarantine requirements). There remains some uncertainty in the health status of Polish ABICs with consequential risks to the health status of their trading partners and livestock farming.

While the majority of movements are controlled, some shortcomings do exist relating to the supervision of trade control measures and the knowledge of those carrying out post movement controls. These include the non- detection of irregular movements of primates into Poland as well as such moves undergoing post movement controls without the inspection officers realising they shouldn't have taken place. These findings together with their geographical distribution reduces the confidence in trade control measures.

7 Closing Meeting

A closing meeting was held on 26 September 2014 with the central competent authority. At this meeting, the FVO audit team presented the findings and preliminary conclusions of the audit.

The CA did not express any disagreement with the conclusions at the closing meeting.

8 Recommendations

The competent authority is invited to submit an action plan, describing the actions taken or planned in response to the recommendations of this report, within 25 working days of receipt of this audit report.

N°.	Recommendation
1.	The CA must have documented procedures in place to ensure the effective delivery of official controls, in particular to ensure adequate approval of ABICs, maintenance of ABIC approval and the standards of disease surveillance and control measures required.Article 8(1) of Regulation (EC) No 882/2004
2.	The CA must ensure the effectiveness and appropriateness of official controls performed on the trade of animals to/from ABICs. In particular, controls should detect irregular movement of animals and ensure that correct certification is issued. Article 4(2)(a) of Regulation (EC) 882/2004 and Article 3 (2) of Directive 96/93/EC
3.	The CA must ensure that on notification of suspicion of a disease listed in Annex A or B to Directive 92/65/EEC, the approval of the ABIC is suspended without delay.Directive 92/65/EEC, Annex C (6)
4.	The CA should verify that veterinarians employed by ABICs possess the knowledge and skills necessary for this particular field of animal health.Directive 92/65/EEC Annex C,1(g)(i)

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=2014-7049

Annex 1 - Legal References

Legal Reference	Official Journal	Title
Dir. 92/65/EEC	OJ L 268, 14.9.1992, p. 54-72	Council Directive 92/65/EEC of 13 July 1992 laying down animal health requirements governing trade in and imports into the Community of animals, semen, ova and embryos not subject to animal health requirements laid down in specific Community rules referred to in Annex A (I) to Directive 90/425/EEC
Dec. 2003/459/EC	OJ L 154, 21.6.2003, p. 112-113	2003/459/EC: Commission Decision of 20 June 2003 on certain protection measures with regard to monkey pox virus
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. 82/894/EEC	OJ L 378, 31.12.1982, p. 58-62	Council Directive 82/894/EEC of 21 December 1982 on the notification of animal diseases within the Community
Dir. 90/425/EEC	OJ L 224, 18.8.1990, p. 29-41	Council Directive 90/425/EEC of 26 June 1990 concerning veterinary and zootechnical checks applicable in intra- Community trade in certain live animals and products with a view to the completion of the internal market
Dir. 91/68/EEC	OJ L 46, 19.2.1991, p. 19-36	Council Directive 91/68/EEC of 28 January 1991 on animal health conditions governing intra-Community trade in ovine and caprine animals
Dir. 91/496/EEC	OJ L 268, 24.9.1991, p. 56-68	Council Directive 91/496/EEC of 15 July 1991 laying down the principles governing the organization of veterinary checks on animals entering the Community from third countries and amending Directives 89/662/EEC, 90/425/EEC and 90/675/EEC
Dir. 92/35/EEC	OJ L 157, 10.6.1992, p. 19-27	Council Directive 92/35/EEC of 29 April 1992 laying down control rules and measures to combat African horse sickness

Legal Reference	Official Journal	Title
Dir. 92/66/EEC	OJ L 260, 5.9.1992, p. 1-20	Council Directive 92/66/EEC of 14 July 1992 introducing Community measures for the control of Newcastle disease
Reg. 21/2004	OJ L 5, 9.1.2004, p. 8-17	Council Regulation (EC) No 21/2004 of 17 December 2003 establishing a system for the identification and registration of ovine and caprine animals and amending Regulation (EC) No 1782/2003 and Directives 92/102/EEC and 64/432/EEC
Reg. 282/2004	OJ L 49, 19.2.2004, p. 11-24	Commission Regulation (EC) No 282/2004 of 18 February 2004 introducing a document for the declaration of, and veterinary checks on, animals from third countries entering the Community
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
Reg. 1266/2007	OJ L 283, 27.10.2007, p. 37-52	Commission Regulation (EC) No 1266/2007 of 26 October 2007 on implementing rules for Council Directive 2000/75/EC as regards the control, monitoring, surveillance and restrictions on movements of certain animals of susceptible species in relation to bluetongue
Reg. 504/2008	OJ L 149, 7.6.2008, p. 3-32	Commission Regulation (EC) No 504/2008 of 6 June 2008 implementing Council Directives 90/426/EEC and 90/427/EEC as regards methods for the identification of equidae
Reg. 206/2010	OJ L 73, 20.3.2010, p. 1–121	Commission Regulation (EU) No 206/2010 of 12 March 2010 laying down lists of third countries, territories or parts thereof authorised for the introduction into the European Union of certain animals and fresh meat and the veterinary certification requirements

Legal Reference	Official Journal	Title
Reg. 1069/2009	OJ L 300, 14.11.2009, p. 1-33	Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (Animal by-products Regulation)
Dec. 97/794/EC	OJ L 323, 26.11.1997, p. 31-36	97/794/EC: Commission Decision of 12 November 1997 laying down certain detailed rules for the application of Council Directive 91/496/EEC as regards veterinary checks on live animals to be imported from third countries
Dec. 2007/598/EC	OJ L 230, 1.9.2007, p. 20-26	2007/598/EC: Commission Decision of 28 August 2007 concerning measures to prevent the spread of highly pathogenic avian influenza to other captive birds kept in zoos and approved bodies, institutes or centres in the Member States
Dir. 2009/156/EC	OJ L 192, 23.7.2010, p. 1-24	Council Directive 2009/156/EC of 30 November 2009 on animal health conditions governing the movement and importation from third countries of equidae
Dir. 2004/68/EC	OJ L 139, 30.4.2004, p. 321-360. Corrected and re-published in OJ L 226, 25.6.2004, p. 128.	Council Directive 2004/68/EC of 26 April 2004 laying down animal health rules for the importation into and transit through the Community of certain live ungulate animals, amending Directives 90/426/EEC and 92/65/EEC and repealing Directive 72/462/EEC
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
Dir. 2000/75/EC	OJ L 327, 22.12.2000, p. 74-83	Council Directive 2000/75/EC of 20 November 2000 laying down specific provisions for the control and eradication of bluetongue
Dir. 2003/85/EC	OJ L 306, 22.11.2003, p. 1-87	Council Directive 2003/85/EC of 29 September 2003 on Community measures for the control of foot-and-mouth disease repealing Directive 85/511/EEC and Decisions 89/531/EEC and 91/665/EEC and amending Directive 92/46/EEC

Legal Reference	Official Journal	Title
Dir. 2005/94/EC	OJ L 10, 14.1.2006, p. 16-65	Council Directive 2005/94/EC of 20 December 2005 on Community measures for the control of avian influenza and repealing Directive 92/40/EEC
Dir. 92/119/EEC	OJ L 62, 15.3.1993, p. 69-85	Council Directive 92/119/EEC of 17 December 1992 introducing general Community measures for the control of certain animal diseases and specific measures relating to swine vesicular disease
Reg. 1760/2000	OJ L 204, 11.8.2000, p. 1-10	Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97