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FINAL REPORT OF AN AUDIT
CARRIED OUT IN
POLAND
FROM 18 JANUARY 2016 TO 26 JANUARY 2016
IN ORDER TO
EVALUATE THE EFFECTIVENESS OF IDENTIFICATION AND REGISTRATION
SYSTEMS FOR BOVINES, SMALL RUMINANTS AND PORCINES

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

This report describes the outcome of an audit in Poland, carried out from 18 to 26 January 2016, as part of the published Directorate-General Health and Food Safety audit programme.

The objective of the audit was to evaluate the suitability of national arrangements in achieving effective traceability of animals to support animal health controls. In particular, to evaluate to what extent the identification and registration systems provide effective support to:

- Outbreaks of highly contagious animal diseases;
- Surveillance, control and eradication programs for less contagious animal diseases; and
- Intra-Union (and export) certification of live animals;

In addition, the audit evaluated whether the current animal identification and registration systems provide for effective and reliable backwards traceability from slaughter to birth and whether the use of various derogations impacted on traceability in different animal health control scenarios.

Overall, the report concludes that :

The national animal identification and registration database in Poland fulfils the minimum legal requirements and provides a basic service to users. However, the system places a heavy burden on resources. Its added value in case of disease outbreaks is not very high as currently implemented as it involves duplication of databases (e.g. each district keeps its own), manual entry of data and need for paper reviews (e.g. checking whether holdings are in a restricted area). The General Veterinary Inspectorate and the Agency for Restructuring and Modernisation of Agriculture (ARMA) recognize the limitations of the database and ARMA are currently tendering for a replacement database to be operational by 2017.

In cases where there is a need to trace back animals, the existing weaknesses in pig identification would result, at best, in increased demands on official services to identify the source of infection and in likely delays implementing control measures.

The significant resources invested are leading to improved timeliness of data reporting but they are not improving data quality.

The intra trade certification for bovines is weak and it results in ineligible bovine animals being certified and traded to other Member States when assembly centres are involved.

The report makes recommendations to the competent authorities aimed at addressing areas in which further improvements are required.

Table of Contents

1	Introduction	1
2	Objectives and scope	1
3	Legal Basis	2
4	Background	2
5	Findings and Conclusions	3
5.1	Quality of data	3
5.2	User interfaces	9
5.3	Review / continuous improvement	13
6	Overall Conclusions	16
7	Closing Meeting	16
8	Recommendations	17

ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
ARMA	Agency for Restructuring and Modernisation of Agriculture
ASF	African swine fever
Assembly Centre	Means holdings, collection centres and markets, at which bovine animals or swine originating from different holdings are grouped together to form consignments of animals intended for trade.
CA	Competent Authority
Dealer	means any natural or legal person who buys and sells animals commercially either directly or indirectly, who has a regular turnover of these animals and who within a maximum of 30 days of purchasing animals resells them or relocates them from the first premises to other premises not within his ownership
DVI	District Veterinary Inspectorate
DVO	District Veterinary Officer
EU	European Union
FBO	Food business operator
GVI	General Veterinary Inspectorate
OV	Official Veterinarian
TRACES	Trade Control and Expert System
VI	Veterinary Inspection Service

1 INTRODUCTION

This audit took place in Poland from 18 to 26 January 2016. The audit team comprised two auditors and a policy officer for this area from DG Health and Food Safety and a national expert from a Member State.

An opening meeting was held on 18 January 2016 with the central competent authority responsible for animal identification, i.e. the General Veterinary Inspectorate (GVI) and the Agency for Modernisation and Restructuring of Agriculture (ARMA). At this meeting, the objectives of, and itinerary for the mission were confirmed by the audit team and the control systems were described by the authorities.

The audit team was accompanied throughout the audit by representatives of the GVI and ARMA.

2 OBJECTIVES AND SCOPE

The objective of the audit was to evaluate the suitability of national arrangements in achieving the key objective of traceability to support animal health controls. In particular, the audit aims at evaluating to what extent the identification and registration systems provide effective support to controls in:

- Outbreaks of highly contagious animal diseases;
- Monitoring, control and eradication programs for less contagious animal diseases; and
- Intra-Union (and export) certification of live animals;

In addition to these objectives, the audit aimed to evaluate whether the current animal identification and registration systems provide for fully effective and reliable backwards traceability from slaughter to birth.

And finally, the audit evaluated the use of various derogations and their impact on achieving traceability in different animal health control scenarios.

The audit aimed to identify best practices in ensuring effective traceability systems for further dissemination. Best practices in the following areas were of particular interest:

- Implementation of the basic requirements;
- Integration and/or interoperability with other databases;
- Performance indicators and/or quality schemes for the databases;
- Any performance testing or simulation exercises on traceability;
- User interfaces e.g. use of mobile technology; and
- Access to the data for various stakeholders.

The scope of the audit included:

- All of the main components of official identification and registration systems;
- Data from year 2012 onwards;

- Bovine, ovine, caprine and porcine species;
- Traceability from import/birth until export/death;
- Quality controls on the data; and
- Official controls on holdings.

The main audit criteria are listed in the Annex. Legal acts quoted in this report refer, where applicable, to the last amended version. Any implementing legislation or derogations falling under those main audit criteria were also applicable to this audit.

In pursuit of these objectives, the following sites were visited:

Visits / meetings	No.	Description
Central Competent Authority (GVI)	3	Opening and closing meeting, meeting with industry stakeholders
ARMA	1	Identification and registration database
	1	District office
Slaughterhouse	1	
Cattle dealer	1	
Sheep farmer	1	
Assembly centre	1	
Cattle farm	1	
Pig point of sale	1	

3 LEGAL BASIS

The audit was carried out under the general provisions of 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.

4 BACKGROUND

The basic objectives for Union rules on identification of animals are the localisation and tracing of animals for veterinary purposes, which is of crucial importance for the control of infectious diseases. In the field of animal health, the systems for animal identification and registration serve as basic tools for disease surveillance, control and eradication. Additionally, they support certification for intra-Union trade or export and import of live animals. These systems are used in the public health sector for issues related to food hygiene, zoonoses and residues.

A new Animal Health Law (adopted at European Union (EU) level) will, together with consequential delegating and implementing acts, provide an opportunity to review the legal requirements for the animal identification and registration systems.

In order to contribute to the future review of the rules on animal identification and registration, the Commission services has initiated a project on animal identification and registration. This project will critically evaluate the suitability of current EU requirements and the added value of current certification arrangements for intra-Union trade.

5 FINDINGS AND CONCLUSIONS

The effective functioning of identification and registration systems depends on three main factors: the quality of data in the system, the capability of the system to provide users with relevant information from that pool of data and the Competent Authority's ability to monitor, review and improve the system. Therefore, the findings and conclusions of this audit have been organised under these three main headings.

5.1 QUALITY OF DATA

Legal requirements

Legislation sets:

- the maximum time limits for notifications of (various events for) both bovines and small ruminants.
- the minimum data requirements for all species, and
- requirements for the Competent Authority to carry out a minimum level of official controls on bovine and small ruminant holdings (farms, slaughterhouses, markets, assembly centres, etc.) to verify compliance with identification and registration requirements. These controls include, amongst other things, a reality check on the data entered into the database. For porcine species, there is no such requirement at EU level.

Findings

1. The Ministry of Agriculture and Rural Development is the Central Competent Authority for animal identification and registration with responsibility for policy, legislation and general overview of controls. For routine controls related to animal identification and registration the District Veterinary Officer (DVO) is the Competent Authority. ARMA is delegated under Polish law to maintain, inter alia, the database of animals (bovine, ovine, caprine and porcine) and holdings and issuing passports. Full details are available in the country profile at :

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

An agreement, dated 15 April 2013, outlines the tasks and principles of cooperation between the VI and ARMA in relation to the identification and registration of farm animals in order to ensure the correct functioning of the system.

2. An extensive list of plausibility checks has been implemented to detect and prevent implausible data being recorded. The list was last reviewed in May 2015.
3. ARMA must be notified of both on and off movements for bovines, sheep, goats and pigs. Approximately 98% of compulsory event notifications, e.g. births and movements relating to bovines, ovines, caprines and pigs are made manually by producers. Nationally, a selection of standardised forms is available to make these notifications. Different forms were available for different events, e.g. every bovine birth required a separate form whereas movement of up to three bovines could be reported on a single form. In one district visited by audit team, a local template had been developed to notify ARMA of movements of multiple animals¹.
4. Animal keepers including farmers, assembly centres, abattoirs and rendering plants can electronically notify events to the database via a platform (CKIRZ). This does not allow direct entry of data into the database and the information must subsequently be entered by ARMA staff. ARMA advised that <5% of stakeholders currently use this service.
5. Data can also be provided from animal keepers in the form of CD-ROMs or USB memory sticks. In one abattoir visited, the operator provided movement data for pigs to their district ARMA office on a fortnightly basis via a CD-ROM. The notification of movements of cattle to slaughterhouses within seven days (between 2013 – 2015) has increased from 72.9% to 89.1%.
6. All event notifications are checked at District ARMA offices prior to manual data entry. If discrepancies exist, ARMA advised that clarification is sought from producers. In the absence of a response, regional ARMA staff make the decision whether or not to perform an on-site control. Any financial penalties subsequent to such on-site controls by ARMA require an additional on-site visit by DVO as only they can impose financial sanctions.
7. For bovines, data provided by ARMA demonstrates improving compliance with producer notifications to the database. For example, between 2013 – 2015, notifications of birth within seven days have increased from 79.7% to 96.0%. Similarly, notifications of on- movements within seven days of the move taking place, has increased from 76.3% to 95.4%.
8. For movements of porcine, ovine, caprine and bovine animals, there is a requirement for two notifications to ARMA (one each from the consigning and receiving keeper). On a monthly basis, ARMA review coherence of data supplied to monitor, e.g. that on and off notifications for a particular animal(s) match and all required animal details have been provided. Lists of non-coherent data are generated and sent to relevant district ARMA offices for follow-up. Data provided by ARMA, demonstrated at 31/12/15, 4.82% of bovine notifications and 20.3% of porcine notifications were non-coherent.

¹ In their response to the draft report the Competent Authority noted that specimen forms relating to animal events are posted on ARMA's internet page under the address: <http://www.arimr.gov.pl/identyfikacja-i-rejestracjazzwierzat/formularze-dotyczace-identyfikacji-i-rejestracji-zwierzat-gospodarskich.html>.

Additionally, at 31/12/15, the location of 4.59% bovines, 4.67% ovines and 7.67% of caprines was unknown.

9. The number of bovine movements where the destination holding has not notified the arrival of bovines within 21 days has shown a slight increase over the past three years as indicated in table below. These animals are a subset of the non-coherent data in paragraph 8 above. The DVO were increasingly applying financial penalties to improve compliance with animal identification requirements. Figures provided by ARMA showed an approximate thirteen-fold increase in financial penalties between 2012 – 2014 for animal identification related issues.

Date	Number of bovines with no "on" notification	Total number of bovine movements	Percentage of bovines with no "on" notification
31/12/13	16,061	6,132,787	0.26%
31/12/14	21,111	6,281,636	0.34%
31/12/15	23,162	6,550,197	0.35%

10. Holding numbers are allocated to farm buildings plus associated land. The land does not need to be contiguous and movement of animals between non-contiguous parcels of land within the holding does not require to be notified, irrespective of distances involved. Producers can have more than one holding number when there is more than one physical location where animals are kept - movement between these holdings must be notified. Additionally, holding numbers are allocated and registered to dealers with no premises or land where animals could be kept².
11. The holding number takes the format: PL followed by a nine digit producer number suffixed by -001 / -002, etc. depending on the number of holdings registered by the producer. The same holding number is used for all bovines, small ruminants or pigs kept on a holding.
12. The database does not contain the geographic co-ordinates or equivalent geographic indication of the holding as required by Section D(1)(b) of the Annex to Regulation 21/2004 (sheep and goats) and Article 1(d) of Decision 2000/678/EEC (pigs).
13. Since 2007, any request for the registration of a new holding must be accompanied by the land registry plot numbers associated with the holding. For 30% of holdings, the ARMA database contains a reference which can be used to identify the land associated with the holding. This information is held by the land registry and to access this information, GVI must contact ARMA who in turn contact the land registry i.e. there is no interoperability between the ARMA and land registry databases.

² In their response to the draft report the Competent Authority noted that such entities are specially identified in the central database so as to inform the VI that animals cannot actually be kept there.

14. For the remaining 70% of holdings, association of land with producer is done by inputting producer name directly into the land registry database. However, when a producer has more than one holding number, this search identifies all buildings and land associated with producer rather than a specific holding.
15. Poland is authorised to apply the derogation provided for in Article 3(2) of Directive 2008/71/EC as regards holdings with one single pig meaning that the Competent Authority is not required to keep an up-to-date list of such holdings. At time of audit, a request from the Competent Authority to have this derogation repealed to enhance controls against African swine fever was scheduled to go before the Standing Committee on Plants, Animals, Food and Feed³.
16. The Polish Act of 2 April 2004 on the identification and registration of animals requires pigs born in Poland to be identified with an ear tag or tattoo bearing the 12 digit holding number of birth. If pigs move to another holding, there is no requirement for them to be marked with the 12 digit holding number of the second holding when they leave. This is not in accordance with the requirements of Article 5(2) of Directive 2008/71/EC.
17. In the majority of cases, it was not possible to read tattoos on live animals in the lairage.
18. In one pig slaughterhouse visited, carcasses observed were identified in a number of ways including :
 - single illegible plastic ear tags,
 - single fully legible ear tags,
 - fully legible 12 digit tattoo of Polish holding number,
 - single fully legible ear tag from another Member State but no tattoo/ear tag with a Polish holding number (even though it arrived at the slaughterhouse from a Polish farm)
 - additionally carcasses were seen with no eartag or tattoo.
19. Regulation (EC) No. 853/2004, Annex III, chapter IV (3) requires the food business operator (FBO) to ensure animals sent for slaughter are identified so their origin can be traced. In the case of carcasses with no ear tag or tattoo, this had not been detected by the operator at ante-mortem examination or by the OV during their verification.
20. In the slaughterhouse visited, FBO operated an internal traceability system whereby all pig carcasses were identified with a FBO batch code which related to the supplier. One batch code reviewed by the audit team demonstrated that pigs presented by one supplier had been sourced from 11 other holdings. The operator was in possession of holding numbers for these 11 suppliers but it was not possible, with the information available in the abattoir, to determine the holding where each pig had been consigned from; for this, as a minimum, each holding register for the 11 holdings would have to be examined.
21. Food chain information reviewed at this slaughterhouse included the holding number of the consigning farm. The GVI confirmed that, following a recommendation in a

³ Committee voted unanimously on 3 February 2016 to withdraw derogation on single pig holding registration for Poland.

previous DG Health and Food Safety audit (DG(SANCO)2014-7294) they had amended their publically available food chain information template document and operators are using it.

22. The food business operator confirmed they did not source pigs from areas in Poland restricted due to African swine fever (ASF). It is not possible to identify herds restricted due to ASF from the database. Instead, the official veterinarian stated they checked that holdings of origin were not in any restricted zone. The official veterinarian had a copy of the most recent EU legislation (Commission Implementing Decision (EU) 2015/2433 which most recently amended Implementing Decision 2014/709/EU) as regards the animal health control measures relating to African swine fever in certain Member States. This listed the restricted districts in, inter alia, Poland.
23. Official controls on compliance with animal identification and registration requirements for bovines and small ruminants are planned annually and the percentage of holdings checked for bovines and small ruminants currently meets the requirements of Article(2)(1) of Regulation (EC) No 1082/2003 and Article 2 of Regulation (EC) 1505/2006. The GVI stated that, under EU legislation on inspections relating to cross-compliance requirements, animal identification and registration inspections are to be carried out on a minimum of 1% of pig producers.
24. The chief veterinary officer selects parameters annually for risk analysis based on the requirements of Article 2(4) of Regulation (EC) No 1082/2003 and Article 3 of Regulation (EC) No 21/2004. A weighting matrix is agreed with ARMA who then allocate a score to each holding. At least 3% of holdings with the highest weighting in each region are then selected for inspection. A report, using a nationally standardised format, is completed for each inspection as required by Article 2(5) of Regulation (EC) No 1082/2003 and Article 6 of Regulation (EC) No 1505/2006. The Competent Authority advised the audit team that in exceptional cases, farmers may be notified of inspection up to 48 hours in advance e.g. holdings distant from District Veterinary Inspectorate (DVI) or large herds where time was needed to restrain stock.
25. The audit team visited two farms and reviewed the 2015 results for on farm controls.
 - For the sheep farm, inspector had a pre-printed list of all sheep expected to be on farm and confirmed they read each individual tag and checked it off against this list. The audit team identified an error transferring data to database following inspection (animals were recorded as present on farm but this information was not recorded in the database).
 - For bovine farm, inspectors similarly checked off all animals against a list generated from database. The audit team identified discrepancies between information held in holding register and database e.g. for one animal the arrival date differed by 2 days and for another animal the date of the movement off differed by 11 days.
26. Data provided by GVI for 2012 - 2014 demonstrated high levels of non-compliance in bovine and ovine holdings inspected.

Percentage of holdings where non-compliance found during inspection:

	2012	2013	2014
Bovine	22.5%	39.9%	37.7%
Ovine	14.5%	27.8%	19.6%

GVI confirmed they had not considered increasing the minimum rate of checks in subsequent years where a significant degree of non-compliance exists as required by Article 2(2) of Regulation (EC) No 1082/2003 and Article 2 of Regulation (EC) No 1505/2006.

27. Poland applies the derogation for sheep identification, as foreseen in Article 9(3) of Regulation (EC) No 21/2004, meaning electronic identification is not obligatory for movements within Poland. Consequently, the majority of sheep are identified by two conventional ear tags as described at:

http://www.arimr.gov.pl/fileadmin/pliki/IRZ/inne/18.11.2015_Sheep_and_Goats_Book_of_registration_.pdf

The individual identification number consists of the prefix PL followed by 12 digits. The first two digits are PL10 for ovines and PL 20 for caprines and the last digit is a control digit.

28. Bovines are identified with two ear tags in compliance with Article 4 of Regulation (EC) No 1760/2000 and as described at :

http://www.arimr.gov.pl/fileadmin/pliki/IRZ/formularze_IRZ/abc/2013_09_12_Bovine_Book_of_registration.pdf

29. The individual bovine identification number consists of the prefix PL followed by 12 digits. The first two digits are PL00 and the last digit is a control digit. Ear tags are ordered by animal owners directly from an approved ear tag manufacturer on the basis of documents issued by ARMA. ARMA maintain a list of approved ear tag manufacturers which, at the time of audit, numbered 15. ARMA advised that the annual limit on bovine ear tags purchase by a farmer was twice the number of breeding animals held. All bovines born in Poland are issued with a passport complying with the requirements of Article 6(1) of Regulation (EC) No 911/2004 and these can be issued immediately by district ARMA offices.
30. The holding register for sheep farm visited was not fully in compliance with Article 5(1) of Regulation (EC) No 21/2004. The register included guidance on recording eartag replacements in imported sheep and if sheep came from another Member State and the eartag was changed to a Polish one. There was no guidance that records had to be kept if

a Polish eartag was replaced. GVI confirmed the format for both sheep and bovine holding registers had been officially approved⁴.

Conclusions

31. GVI and ARMA are directing significant resources to implementation of official controls on identification and registration of animals and the verification of data quality in the database. Timeliness of data reporting is improving but despite efforts, weaknesses remain with data quality and actions taken don't appear to be significantly improving data quality.
32. In case of disease outbreak, the existing weaknesses in pig identification would lead to an increased number of herds being restricted and investigated in order to determine the route and source of infection. Consequently, this would result in increased demands on official services and likely delay in implementing control measures. The necessary backward tracing using holding registers would not be possible where pigs had no identification or illegible identification.
33. The ARMA database does not include a geographical indication of the holding nor data on ASF restrictions. Holdings could include non-contiguous parcels of land. Thus, the process for tracing back animals is burdensome and time-consuming (e.g. to ascertain whether pigs come from holdings in restricted areas due to ASF, officials would need to cross check manually data from the land register and EU legislation listing restricted districts).

5.2 USER INTERFACES

User interfaces provide the various user-groups with relevant information from the database. The needs of users vary depending on the user-group and the use-case-scenario. For the purposes of this audit, three use-case-scenarios were used to evaluate the services provided by the databases: disease outbreaks, eradication programmes and certification for intra-Union trade (as described in the objectives of this audit).

Legal requirements:

The suitability of user interfaces in achieving animal health traceability was evaluated using the following criteria:

- Access to relevant data and functionalities;
- Fitness for purpose; and
- Usability.

⁴ In their response to the draft report the Competent Authority noted that the template register for bovine animals, sheep, goats and swine is published in the Regulation of the Minister for Agriculture and Rural Development of 29 July 2005 concerning the register of bovine animals, swine, sheep and goats (Journal of Laws 2005/151, item 1268, as amended).

Access: Article 3 of Regulation (EC) 1760/2000 (for bovines) and of Regulation (EC) 21/2004 (for small ruminants) both require that: *"The Member States and the Commission shall take the measures necessary to ensure access to these data for all parties concerned, including consumer organisations having an interest which are recognised by the Member State, provided that the data confidentiality and protection prescribed by national law are ensured."* While a database is also required for porcine holdings, there is no specific requirement for providing access to all parties concerned.

Fitness for purpose: there are two very basic legislative requirements on the functionalities of the databases – both of these are under point C (3) to Article 14 of Council Directive 64/432/EEC. It says: *"The database must be able to supply the following particulars at any time:*

- *the identification number of all animals of the bovine species present on a holding, or in the case of groups of animals of the porcine species, the registration number of the holding of origin or herd of origin and the number of the health certificate where applicable; and*
- *a list of all changes of holding for each animal of the bovine species starting from the holding of birth, or the holding of importation in the case of animals imported from third countries; and for groups of pigs the registration number of the last holding or last herd and for imported animals from third countries the holding of importation."*

Usability: legislation does not prescribe criteria to evaluate usability. It is up to the Member States to decide the level of support and efficiency provided by the databases for each user group.

Findings

Stakeholders' access to data

34. Article 29 of the Act of 2 April 2004 on the identification and registration of animals provides VI with the right to access the database and permits them to make corrections/additions to data held. VI access is via a platform which allows e.g. direct restriction of animal movements. DVI has access to data on herds registered in the district, Regional Veterinary Inspectorate to data on herds registered in region and central staff have access to data across the whole country.
35. The GVI confirmed that, pursuant to Article 11(1) of the Act on the protection of animal health and control of infectious diseases, the DVO registers all animal owners who keep farm animals in order to place them or products derived from them on the market. Consequently, each DVO has its own stand-alone database which may simply be an excel spreadsheet. These records are only accessible by that district and there is no interoperability with other district or ARMA database.
36. During disease outbreaks, the ARMA database can provide basic information such as owner details, type and numbers of animals present, movements in and out of holding

within specified times and other holding numbers associated with producer. GVI advised that the procedure for establishing protection and surveillance zones and listing holdings therein is as follows: DVI notify GVI (centrally) of the location of the suspect outbreak. GVI use maps (hard copies) to establish restricted zones and then request ARMA to provide data on holdings within zones. If a complete district is included in the zone, ARMA can provide data directly otherwise, data must be requested from the land registry office. GVI stated this process could take a maximum of 24 hours.

37. There is limited scope to use ARMA database as a disease management tool. The local District database is used for disease control purposes e.g. recording results for tuberculosis testing / setting due test dates. The DVI database regarding movements was not regularly updated using information held in ARMA database⁵.
38. District veterinary officers issue health certificates for intra-Union trade and export certificates for live animals. If the animals enter intra-Union trade via an animal assembly centre, a pre-certification system is used from the holding of origin of the animals to the assembly centre. This system was evaluated by the audit team at an assembly centre for bovine animals and at a dealer of bovine animals.
39. As a starting point, the DVI provides a written Decision to farmers confirming the health status of the animals on their holding in relation to e.g. bovine tuberculosis and bovine brucellosis based on the test results held in the DVI database and movement history recorded in the ARMA database.
40. A veterinarian designated by the DVO provides pre-certification attesting, inter alia, that animals for fattening and breeding:
 - originate from a holding not restricted for animal health disease reasons and is free from bovine tuberculosis, bovine brucellosis and enzootic bovine leucosis (based on DVI Decision), and
 - have remained on holding of origin during the previous 30 days or since birth if animal is less than 30 days of age.
41. This pre-certificate, along with the bovine passport, accompanies animals to an assembly centre or a dealer and provides the basis for DVO certification for trade or export.
42. In the dealer visited, the certification of a consignment of bovines destined for export was reviewed by the audit team. The pre-certificates were available and in addition, the consignment had been examined by the designated veterinarian responsible for the dealer premises on a daily basis for 21 days prior to export to fulfil the requirements of the importing country.

⁵ In their response to the draft report the Competent Authority noted that the purpose of the register kept by the DVO is not to record animal movements and it is not updated in this regard.

43. In the assembly centre visited, the audit team selected and reviewed a sample of certificates from the Trade Control and Expert System (TRACES) and supporting documents for consignments of bovines certified for intra-EU trade and noted the following:
- one calf had pre-certification from its birth herd and a passport showing it left its birth herd at 21 days of age and arrived at the assembly centre three days later. The passport confirmed the calf had been registered in three holdings before arriving at the assembly centre.
 - records for a second calf showed it arrived at the assembly centre, at 23 days of age, having been registered in three other holdings before arriving at the assembly centre.
44. The audit team reviewed approximately five intra-trade certificates selected from TRACES and issued from an assembly centre in a different region of Poland and cross checked animal movements in the ARMA database. One calf left its holding of birth at 21 days of age, spent three days at a second holding before moving to an assembly centre and being certified for intra-EU trade the following day. This, along with point (43) above, is not in compliance with the requirements of Article 6 to Council Directive 64/432/EEC. In the final meeting, the competent authority provided a copy of a letter dated 25 January 2016 and addressed to all regional veterinary inspectorates. This letter stated that all animals moving to an assembly centre must move there directly from a farm where they have spent at least the previous 30 days or since birth if less than 30 days of age.
45. Discrepancies were identified between destination recorded in two intra-trade certificates and the destination recorded in the register of the assembly centre and the ARMA database. The intra-trade certificates recorded Germany and France as countries of destination (which were the true destinations) whereas the assembly centre's register and the ARMA database recorded The Netherlands and Spain respectively (because the owner of the assembly centre recorded the consignee rather than the destination).
46. A staff instruction dealing with intra-EU trade of bovines (GIWz.410/T – 8/10 of 14 May 2010) was available to VI staff. This instruction included a flowchart for trade of animals from assembly centres. The flowchart did not clearly outline the requirements for bovines to have a 30 day residence in farm consigning bovines to assembly centre or since birth if consigned from holding of birth.

Fitness for purpose

47. For bovines, the database can provide all changes of holding for each animal. However, due to the fact that holding numbers can be allocated and registered to dealers with no premises or land where animals could be kept, database records do not always reflect where animals are physically present⁶.
48. The method of pig identification described at paragraph 16 above introduces uncertainty when trying to determine the holding from which pigs came.

Usability

49. Stakeholders continue to use hard copy notifications rather than e-notifications (one reason given related to expiry of access passwords) because it is quicker and easier.
50. As described in paragraphs 13 and 14 above, the process to associate land with holding number requires input from more than one official service making it less efficient.
51. There is no process to highlight farms situated within ASF restricted areas on the ARMA database.

Conclusions on user interfaces

52. The holdings which bovines are associated with are accurately recorded in the database, but as the database records indiscriminately movement and ownership transactions for bovines, they do not always reflect where the animals are / have been at a given time (e.g. dealers with no premises). In a disease outbreak situation, the CA would need more resources to determine where animals are / have been.
53. There is a weak system of certification of live bovine for intra-union trade from assembly centres. As all relevant available information is not reviewed by certifying officers prior to issuing veterinary certification, the system does not provide the necessary guarantees and illegible animals (i.e. animals that did not stay 30 days prior to loading or since birth in holding of origin) are certified and traded, which increases the risk of spreading diseases through the EU.

5.3 REVIEW / CONTINUOUS IMPROVEMENT

Compliance with minimum legal requirements requires significant investments but doesn't guarantee efficient and effective functionalities for the various services provided. In order to bring the systems up to a level where users get real benefits and return for investment, more

⁶ In their response to the draft report the Competent Authority noted that the registered office of dealers without premises has a special identifier in the Central Database. This means that even if a movement of animals to such a location is registered in the Central Database, it is apparent that the animals have not been physically moved to that entity.

than minimum compliance is needed. Review and continuous improvement are the mechanisms, which ensure that users receive a good quality of service, and the system continues to deliver efficiently and effectively what is expected from it.

Four elements of monitoring and review were assessed:

- Monitoring of control results for:
 - Food business operator's compliance levels, types of non-compliance and trends;
 - Verifying effectiveness of controls and further development;
- Analysis of existing data for various purposes; and
- Internal and external audits or other evaluations.

Legal requirements

Monitoring of control results: Commission Decision 2008/654/EC provides guidance on the annual report for the single integrated multiannual control plan. Point 9.2.2 of the Annex to this Decision suggests that control data should be analysed, patterns and trends identified and root causes for non-compliance described, as appropriate.

Article 4.2 of Regulation (EC) 882/2004 has a generic requirement: *"The Competent Authorities shall ensure the effectiveness and appropriateness official controls on live animals..."* Article 8.3 of the same Regulation requires Competent Authorities to *"have procedures in place to verify the effectiveness of official controls that they carry out..."* Monitoring of control results is one way of addressing the latter requirement – other means do exist but those fall outside the scope of this audit.

There is no explicit legal requirement in the specific identification and registration systems legislation to monitor, review and improve the systems. Equally, analysis of existing data for various purposes is not a legal requirement – this audit attempted to harvest good/best practice in this area, if possible.

Internal and external audits or other evaluations: Article 4.6 of Regulation (EC) 882/2004 requires that Competent Authorities *"...carry out internal audits or have external audits carried out, and shall take appropriate measures in the light of their results..."*

Findings

Monitoring of trends and patterns in non-compliance

54. The GVI compiles annual control reports on identification and registration of bovines and small ruminants and transmits them to the Commission. Reports include details on the number of holdings and number of animals inspected and frequencies of non-compliances. This fulfils the requirements of Article 5 of Regulation (EC) No 1082/2003 and Article 7 of Regulation (EC) No 1505/2006.
55. ARMA confirmed they generate monthly reports for individual dealers who have kept bovines on their premises for more than 30 days and forward this data to relevant DVI.

Examples of these reports were seen in DVI office visited. DVI is expected to follow-up these reports which can lead to fines. ARMA stated no report is run for animals exceeding six day residency in assembly centres.

56. On a monthly basis, ARMA review coherence of data as described in paragraph 6 above.
57. The GVI confirmed they had not considered increasing the minimum rate of checks in subsequent years where a significant degree of non-compliance exists (see paragraph 26) as required by Article 2(2) of Regulation (EC) No 1082/2003 and Article 2 of Regulation (EC) No 1505/2006.
58. The GVI and ARMA recognize the limitations of the database and ARMA are currently tendering for a replacement to be operational by 2017. Correspondence between ARMA and GVI was presented detailing proposed improvements to the system. The tender announcement for the new system was published on 17/09/15.

Data analysis

59. CA presented evidence of some patterns and trends in control data being analysed e.g. reporting times for movement notifications and non-coherent data. Conversely, evidence was not presented for analysis of trends related to e.g. non-compliance detected during on farm controls and bovines with no on movement notifications. No evidence of any analysis to determine the root causes for non-compliance was presented by CA.

Audits or other evaluations

60. CA confirmed Regional Veterinary Inspectorate was responsible for audit of DVI activities relating to animal identification and registration. This involved documentary review of DVI official controls and observing official control being carried out on the spot. In one district visited by the DG Health and Food Safety team, there had been one such audit in 2015, none in 2014 and four in 2013.
61. ARMA's internal audit department carried out an audit on the animal identification and registration system database management in 2015. Findings included:
 - an improvement in the timeliness of notifications of e.g. movement events for bovines and ovines,
 - discrepancies between information held in ARMA database and the actual situation e.g. database registering the number of animals on holding while in reality, no animals were kept
 - identification of a number of holdings where animal movements had taken place despite animal movement restrictions being in place at the time.

ARMA confirmed that the recommendations of this internal audit had been addressed.

Conclusions on review and continuous improvement

62. There is verification in place which gives assurance that official controls are performed correctly. Regular review of data is performed at different levels and attempts are made to correct each individual error. There is significant potential to further analyse available data to identify patterns and trends and establish the root cause for non-compliances to improve the overall system of animal identification and registration.

6 OVERALL CONCLUSIONS

The national animal identification and registration database in Poland fulfils the minimum legal requirements and provides a basic service to users. However, the system places a heavy burden on resources. Its added value in case of disease outbreaks is not very high as currently implemented as it involves duplication of databases (e.g. each district keeps its own), manual entry of data and need for paper reviews (e.g. checking whether holdings are in an ASF restricted area). The GVI and ARMA recognize the limitations of the database and ARMA are currently tendering for a replacement database to be operational by 2017.

In cases where there is a need to trace back animals, the existing weaknesses in pig identification would result, at best, in increased demands on official services to identify the source of infection and in likely delays implementing control measures.

The significant resources invested are leading to improved timeliness of data reporting but they are not improving data quality.

The intra trade certification for bovines is weak and it results in ineligible bovine animals being certified and traded to other Member States, especially when assembly centres are involved.

7 CLOSING MEETING

A closing meeting was held on 26 January 2016 with the central Competent Authority. At this meeting the audit team presented the findings and preliminary conclusions of the audit. Some clarifications were provided by the Competent Authority who did not express any disagreement with the preliminary conclusions at the closing meeting. In addition, the Competent Authority provided a copy of a letter, dated 25 January 2016, addressed to all regional veterinary inspectorates stating all animals moving to an assembly centre must move there directly from a farm where they have spent at least the previous 30 days or since birth if less than 30 days of age.

8 RECOMMENDATIONS

The Competent Authority is invited to provide details of the actions taken and planned, including deadlines for their completion ('action plan'), within 25 working days of receipt of the report, aimed at addressing the recommendations set out below.

No.	Recommendation
1.	<p>The Competent Authority should ensure that pigs can be traced back to the holding from which they came as required by Article 5(2) of Directive 2008/71/EC (i.e. they are marked with either an ear tag or tattoo making it possible to determine the holding from which they came and enabling reference to be made to any accompanying document which must mention such ear tag or tattoo).</p> <p>Recommendation based on conclusion No.32</p> <p>Associated findings Nos.16, 18, 19, 20</p>
2.	<p>The Competent Authority should ensure that bovine animals sent from its territory to another Member State have remained in a single holding of origin for a period of 30 days prior to loading or since birth, as required by Article 6(1) of Directive 64/432/EEC and that this is certified in line with the principles in Directive 96/93/EC.</p> <p>Recommendation based on conclusion No. 53</p> <p>Associated findings Nos. 43 and 44</p>
3.	<p>The Competent Authority should increase the quality of their identification and registration data of bovine, ovine and caprine animals by increasing the check rates when a significant degree of non-compliance is identified- as required by Article 2(2) of Regulation (EC) No 1082/2003 and Article 2 of Regulation (EC) No 1505/2006.</p> <p>Recommendation based on conclusion No. 31</p> <p>Associated finding No. 26</p>
4.	<p>The Competent Authority should ensure that the database contains the geographic coordinates or equivalent geographic indication of the holding as required by Section D(1)(b) of the Annex to Regulation 21/2004 (sheep and goats) and Article 1(d) of Decision 2000/678/EEC (pigs).</p> <p>Recommendation based on conclusion No. 33</p> <p>Associated findings No. 12</p>

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

http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=2016-8776

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
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
Reg. 911/2004	OJ L 163, 30.4.2004, p. 65-70	Commission Regulation (EC) No 911/2004 of 29 April 2004 implementing Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards eartags, passports and holding registers
Reg. 1082/2003	OJ L 156, 25.6.2003, p. 9-12	Commission Regulation (EC) No 1082/2003 of 23 June 2003 laying down detailed rules for the implementation of Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards the minimum level of controls to be carried out in the framework of the system for the identification and registration of bovine animals
Reg. 494/98	OJ L 60, 28.2.1998, p. 78-79	Commission Regulation (EC) No 494/98 of 27 February 1998 laying down detailed rules for the implementation of Council Regulation (EC) No 820/97 as regards the application of minimum administrative sanctions in the framework of the system for the identification and registration of bovine animals
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
Dec. 2006/968/EC	OJ L 401, 30.12.2006, p. 41-45	2006/968/EC: Commission Decision of 15 December 2006 implementing Council Regulation (EC) No 21/2004 as regards guidelines and procedures for the electronic identification of ovine and caprine animals

Reg. 1505/2006	OJ L 280, 12.10.2006, p. 3-6	Commission Regulation (EC) No 1505/2006 of 11 October 2006 implementing Council Regulation (EC) No 21/2004 as regards the minimum level of checks to be carried out in relation to the identification and registration of ovine and caprine animals
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
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
Dec. 2008/654/EC	OJ L 214, 9.8.2008, p. 56-65	2008/654/EC: Commission Decision of 24 July 2008 on guidelines to assist Member States in preparing the annual report on the single integrated multiannual national control plan provided for in Regulation (EC) No 882/2004 of the European Parliament and of the Council