EUROPEAN COMMISSION
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Health and food audits and analysis

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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

POLAND

FROM 22 TO 30 MAY 2018

IN ORDER TO

EVALUATE THE IMPLEMENTATION OF HYGIENE, TRACEABILITY AND TRADE REQUIREMENTS OF PROCESSED ANIMAL PROTEINS, INCLUDING EXPORTS, IMPORTS AND INTRA-UNION TRADE

Executive Summary

This report describes the outcome of an audit carried out in Poland from 22 to 30 May 2018 as part of the European Commission's Directorate-General for Health and Food Safety published work programme.

The audit is part of a series of audits aimed at evaluating the measures put in place by the competent authorities to verify and ensure that the requirements regarding the hygiene, traceability and the trade of processed animal protein are implemented by relevant business operators, as required by Regulation (EC) No 1069/2009, Commission Regulation (EU) No 142/2011, Regulation (EC) No 999/2001 and Regulation (EC) No 882/2004.

The structure and functioning of the official control system governing the chain of production and trade of processed animal proteins, provides a good basis for assuring that these products fulfil relevant requirements on hygiene and traceability. Nevertheless there are two main shortcomings in the system in that (a) there are errors in the list of food operators eligible to supply animal by-products for the production of processed animal protein to be used for aquaculture resulting in the possibility of ruminant protein (dairy) being present and (b) the competent authorities have largely not met their notification requirements concerning the arrival of consignments of processed animal proteins from other EU Member States and the dispatch of consignments of organic fertilisers/soil improvers containing processed animal proteins to other Member States. Collectively these shortcomings undermine the reliability of information on intra-EU-trade of such products and the solidity of the feed ban measures concerning the aquaculture sector.

The report contains recommendations to the Polish competent authorities to address the shortcomings identified.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
ABP	Animal by-products
BIP	Border Inspection Post
CCP	Critical Control Point
DVI	District Veterinary Inspectorate
DVO	District Veterinary Officer
GTH	Glyceroltriheptanoate
HACCP	Hazard Analysis and Critical Control Points
GVI	General Veterinary Inspectorate
MBM	Meat and bone meal
PAP	Processed animal protein, as defined in point 5 of Annex I to Regulation (EU) No 142/2011.
TRACES	TRAde Control and Expert System

1 INTRODUCTION

This audit took place in Poland from 22 to 30 May 2018 as part of the European Commission's Directorate-General for Health and Food Safety published work programme. The audit team comprised two auditors from the Commission and was accompanied throughout the audit by representatives of the central competent authority, the General Veterinary Inspectorate (GVI).

An opening meeting with representatives from the GVI and from the regional and the local authorities visited during the audit was held on 22 May 2018, during which the objectives, itinerary and the reporting procedures for the audit were confirmed.

2 OBJECTIVES AND SCOPE

The main objective of the audit was to evaluate the measures put in place by the GVI to verify and ensure that the requirements regarding the hygiene, traceability and the trade of processed animal protein (PAP) are implemented by relevant business operators, as required by Regulation (EC) No 1069/2009 of the European Parliament and of the Council, Commission Regulation (EU) No 142/2011, Regulation (EC) No 999/2001 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council.

The audit focused on the production, placing on the market and trade of PAP and included its export from/import to/from non-EU countries. Official controls carried out at food processing plants, including food retailers, where animal by-products (ABP) are generated, were excluded from the scope of this audit. In pursuit of the objective, the following sites were visited:

Visits/meetings		**No**	**Comments**
Competent authority	Central	2	Opening and closing meetings
	Local	3	Meeting with two District Veterinary Office and one Border Inspection Post (BIP)
Processing plants		3	Processing Category 3 ABP. Two of them with multiple lines processing also ABP of ruminant origin and one only processing poultry ABP
Transporters		2	All transporting PAP. One of them transporting PAP and other feed
Trader		1	Trading PAP to other Member States and exporting

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, Article 49 of Regulation (EC) No 1069/2009 and Article 21 of Regulation (EC) No 999/2001.

4 BACKGROUND

4.1 OVERVIEW OF THE PRODUCTION AND TRADE OF PAP IN POLAND

In Poland, the production of PAP takes place in almost 100 Category 3 plants where Category 3 ABP are processed. In 2017 the resulting PAP amounted to around 295,000 tonnes of around 130,000 tonnes were used at national level, 77,000 tonnes were traded to other Member States and 84,000 tonnes were exported. Around 73,000 tonnes of Category 1 and 2 meat and bone meal (MBM) were produced from Category 1 and 2 ABP.

4.1.1 Production and use of derived products from animal by-products

ABP generated in 2017 (tonnes)	**Derived products produced in 2017 (tonnes)**	**Use of derived products in 2017**	
		Uses	**Quantities (tonnes)**
CAT 1: 281,338	MBM: 68,097	Incineration/co-incineration	57,291
		Trade to another Member State for incineration	18,906
		Other uses/destinations:	0
	FAT: -		
CAT 2: 27,948	MBM: 5,285	Incineration/co-incineration:	0
		Trade to another Member States:	4,977
		Other uses/destinations:	3
	FAT: -		
CAT 3: 1,316,323	PAP: 295,802	Domestic uses	128,696
		Trade to another Member State:	77,309
		Export	84,247
	Other (specify):		

4.1.2 Intra-EU trade: PAP traded from and to Poland in 2017

	No of consignments	**Total weight (tonnes)**	**Top five Member States**
From Poland	3,717	89,968	IT, DE, CZ, SK, LT
To Poland	1,267	27,898	DE, CZ, SK, BE, IT

4.1.3 Export of PAP-containing ruminant proteins in 2017

Country of destination (top five countries)	**No of consignments**	**Total weight (tonnes)**
Vietnam	718	16,129
Nigeria	114	2,441
Myanmar	71	1,553
Ghana	59	1,251
Singapore	29	623

5 FINDINGS AND CONCLUSIONS

Legal acts quoted in this report are provided in Annex I and refer, where applicable, to the last amended version. Relevant articles or sections of the legislation cited in Annex I are referred to in the individual findings in this section of the report.

5.1 STRUCTURE OF THE SYSTEM OF OFFICIAL CONTROLS ON THE PRODUCTION AND TRADE OF PAP

5.1.1 Competent authorities involved

Legal requirements

Articles 4 and 6 of Regulation (EC) No 882/2004

Findings

1. Official controls on business operators producing and trading PAP are included in the wider scope of controls of the ABP chain. These controls are largely described in the Commissions' country profile for Poland, available at:

   http://ec.europa.eu/food/audits-analysis/country_profiles/details.cfm?co_id=PL

2. The GVI is the competent authority for ABP (including controls over the production and trade of PAP) and is the main body responsible for policy implementation and enforcement in this sector, through the Animal Feedingstuffs, Pharmacy and Rendering Office. The various District Veterinary Officers (DVOs), head of relevant District Veterinary Inspectorates (DVIs) spread in 16 regions, are responsible for registration, approval and official controls along the chain of ABP and derived products, including controls in the scope of this audit.

3. In each region, one official, at least, deals with ABP matters. Staff at regional level have to supervise official controls carried out by the DVOs under their jurisdiction and, in a 5-years cycle, have to visit each DVI and, for all topics, check their performance. Concerning official sampling, regions allocate the number of samples determined by the GVI to the various DVIs (see also section 5.1.3.2). Annual reports are sent by the regions to the GVI with details of inspections carried out and samples taken.

4. The allocation and distribution of various responsibilities at central, regional and local level in the area of official controls within the scope of the audit and the coordination activities demonstrated during the audit are generally in line with the relevant requirements laid down by Article 4 of Regulation (EC) No 882/2004.

5. Quarterly training sessions on topics related to ABP and feed are organised by the GVI for representatives of the regional authorities. These (mainly two day) trainings are compulsory and further training sessions (on average, every one-two years) are organised for relevant DVI staff. The audit team saw records of a number of these

training courses held during 2017. In 2017 new requirements concerning the export of PAP containing ruminant proteins were discussed.

5.1.2 Registration, approval and authorisation of ABP plants and operators

Legal requirements

Articles 23, 24, 44 and 47 of Regulation (EC) No 1069/2009
Article 32(5) and Chapter II of Annex XVI to Commission Regulation (EU) No 142/2011
Article 7 and Section D of Chapter IV, Section A of Chapter III and Section A of Chapter V of Annex IV to Regulation (EC) No 999/2001

Findings

6. According to representatives from the GVI, ABP plants and operators are listed in publicly available lists. On-line registration forms are directly accessible to the public on the GVI website. The same information technology (IT) system is used in all DVIs from which these lists are generated. In this way the updating of such lists is facilitated as the officials, at DVI level may enter directly any change concerning the activities carried out by a business operator.

7. All of the ABP plants and operators visited by the audit team, and their suppliers or clients, were registered or approved as required by Articles 23 and 24 of Regulation (EC) No 1069/2009 and were listed in publicly available lists of ABP plants and operators, as required and 47 of the same Regulation.

8. The process of listing eligible plants along the chain of production of non-ruminant PAP for the manufacturing of feed for aquaculture is relatively advanced, with a number of food, ABP and feed plants listed. Even though the GVI had issued guidance to the DVOs who are responsible for maintaining the lists, there were some inaccuracies in the lists of food plants; the audit team noted that, in several cases, they contained dairy plants. This is not in line with the relevant requirements laid down in Section A, Chapter V of Annex IV to Regulation 999/2001 [1], as ABP from a dairy plant contains ruminant proteins.

5.1.3 Planning of official controls

Legal requirements

Articles 4(3) and 45 of Regulation (EC) No 1069/2009
Article 32 of Commission Regulation (EU) No 142/2011
Article 7 and Annex IV to Regulation (EC) No 999/2001
Articles 3, 4 and 8 of Regulation (EC) No 882/2004

[1] In this regard, technical specifications for food, ABP and feed establishments were endorsed at the meeting of the Standing Committee for Plants, Animals, Food and Feed on 29 March 2017

Findings

5.1.3.1 Planning of inspections

9. ABP plants and operators are classified in various risk-classes, based on their activities. Each class is associated with a frequency of inspections. Among others, ABP plants and operators in the scope of this audit have the following frequencies of inspections: a) processing plants: twice per year; b) transporters: once per year; c) traders: once per year. Regardless of the afore-mentioned frequencies of inspections, as a general rule, most of the relevant requirements (included in specific checklists, see finding 13) have to be verified at least once per year. The only exception concerns the verification of the HACCP requirements where the timeframe is two years.

10. Annually, every DVI has to plan inspections of registered and approved ABP plants and operators according to the above-mentioned frequencies. Examples of suitable IT planning tools were seen in the DVIs visited by the audit team, although in some cases the number of inspections carried out was lower than expected (see finding 16).

5.1.3.2 Sampling programme

11. Annually, a national official sampling programme for feed is determined by the GVI in consultation with the National Reference Laboratory according to risk criteria. For the scope of this audit, in 2016, the sampling programme included 1,600 samples to detect the presence of unauthorised protein of animal origin in feed and the same for 2017. Presence of Salmonella in PAP is also included in this sampling programme, although there is no specific number of samples established. This is in line with the relevant provision laid down by Point 1(b), Section 1, Chapter 1 of Annex XVI to Regulation (EU) No 142/2011 which prescribes taking samples as required. In 2017, based on this criterion, 113 samples were taken in PAP.

12. In 2017, the GVI planned 91 samples to determine the level of glyceroltriheptanoate (GTH) in Category 1 and 2 MBM with an additional eight samples planned for GTH in Category 3 PAP. In three samples of MBM the level of GTH detected was lower than required by Point 1, Chapter V of Annex VIII to Regulation (EU) No 142/2011, (250 mg GTH per kg fat). Appropriate actions to address these non-compliances were taken by the competent authorities and the audit team saw records of these (see section 5.2.4).

5.1.3.3 Procedures and instructions

13. There is a largely comprehensive set of checklists (*Spiwet*) and Notes/circulars issued by the GVI available for officials carrying out all types of official controls in the area audited. For example, there is a Note containing the main provisions and principles for official controls in the ABP sector, including the use of the TRAde Control and Expert System (TRACES) for the intra-EU trade of PAP. The audit team reviewed the checklists used during inspections of processing plants (*Spiwet No 1*), transporters (*Spiwet No 4)* and the one (*Spiwet No 8)* used to evaluate the applicable requirements

concerning Hazard Analysis and Critical Control Points (HACCP). All these documents are available on-line.

14. There is no specific checklist for traders of ABP and derived products. *Spiwet No 1* is generic for all categories of processing plants and as a result, this checklist does not contain specific elements such as the need for on-the-spot evaluations by the inspector of the eligibility of raw materials used for the production of PAP destined for animal feed.

5.1.4 Conclusions on the structure of the system of official controls

15. The system of official controls covering processing plants, traders and transporters of PAP, is underpinned by clear allocation of responsibilities and effective flow of information between local and central level and vice-versa. Inspections are generally risk-based, supported by a largely comprehensive set of procedures and based on a largely reliable list of ABP plants and operators. Samples to verify microbiological criteria and the presence of non-authorised proteins of animal origin are also planned on a risk-basis. However, the inaccuracies identified in the list of food operators eligible to supply ABP for the production of PAP to be used for aquaculture means that ruminant protein derived from milk could inadvertently end up being present in PAP for aquaculture animals.

5.2 IMPLEMENTATION OF OFFICIAL CONTROLS

Legal requirements

Articles 4(3), 21, 22, 41, 43, 45(1), 46, 48 and 53 of Regulation (EC) No 1069/2009
Articles 8, 17(1), 20, 21, 31, 32 and Annexes IV, VIII, IX, X, XV and XVI to Commission Regulation (EU) No 142/2011
Article 7 and Annex IV to Regulation (EC) No 999/2001
Article 3 of Regulation (EC) No 882/2004

Findings

16. According to the information provided by the GVI, with the exception of traders and transporters, the planned frequencies of inspections and number and type of samples were largely followed in 2016 and 2017. For traders 56% and 48% of the planned inspections were carried out in 2016 and 2017 respectively. For transporters the figures were 107% and 81% for both years. Regarding traders, the GVI stated that the main reason for failure to meet planned targets was logistical difficulties to organise such inspections with these types of operators, when the person in charge is often out of the office. In the two DVIs visited, the number of inspections in traders and transporters was lower than planned because of the stated need to prioritise those controls due to a claimed shortage of staff. In one of the offices there was one full-time-equivalent post vacant.

17. During the visits to the ABP plants and operators and during the meetings at the DVIs the audit team noted that officials make use of relevant checklists and other documentation available on-line.

5.2.1 Hygiene requirements

18. The three Category 3 processing plants visited had comprehensive HACCP plans in place and relevant critical control points (CCPs) were adequately described and managed by the operators.

19. In one of the two transporters visited, where reusable tankers were used to carry MBM, PAP and feed materials (cereals) there were adequate cleaning procedures of tankers before and after each consignment of MBM or PAP and appropriate supporting documentation (cleaning records).

20. Officials check hygiene requirements during planned inspections (and, on an ad-hoc basis, where deemed necessary) and the outcome is recorded in the relevant checklists. The audit team review several records of inspections and noted that in general inspectors reported clear references or evidence to support the assessment of each point of the checklist verified during the inspection. All officials met were familiar with relevant hygiene requirements.

21. In one of the three Category 3 processing plants visited, co-located with a Category 1 processing plant, the audit team noted the presence of Category 2 ABP (parts of pig intestines which had not been emptied) in the reception area, ready to be processed. The business operator explained that this was due to human error of the driver who had unloaded the material in this plant instead of the adjacent Category 1 processing plant. As proof of this explanation the operator showed a commercial document accompanying a consignment dated the day before in which the material was described as Category 2 ABP and included, as destination, the Category 1 processing plant. It was not possible to verify that the document presented actually related to the consignment physically observed. After the visit the local DVO and relevant regional authority declared that the entire batch containing Category 2 ABP seen by the audit team had been incinerated. The local authorities also declared that no such problems had been identified during any of their official controls (two per year) to date, though the format of Spiwet No 1 does not include elements such as the need for on-the-spot evaluations by the inspector of the eligibility of raw materials used for the production of PAP destined for animal feed (see finding 13).

22. In the second Category 3 processing plant a production line was dedicated to the processing of multispecies ABP (including ruminant). Representatives from the plant declared that between 2016 and 2017 they had recurrent problems with the presence of digestive tract content of mammals collected from slaughterhouses and had notified the relevant authorities thereof. In February 2017, in response of these problems, the relevant regional authority informed the DVOs and the regional authorities where the food operators supplying ABP were located, to raise the need to take actions with the

operators concerned. This information was sent in copy also to the GVI. The local DVO and regional authority declared that this year the situation had improved. In 2017 there were 3 inspections between 17 and 27 February and then in 2018 between 22 of March and 13 of April. No issues in this regard had been identified.

23. Two of the visited Category 3 processing plants had several lines processing ABP of poultry origin and pig blood, all of which were using processing method 7 which had been validated by the ABP operators and authorised by the relevant DVOs. All of the analytical reports of the samples taken during the 30 days period of validation required by Article 8 and point G(1), Chapter III of Annex IV to Commission Regulation (EC) No 142/2011 were available in the validation files kept by the relevant DVOs. The audit team noted that analytical reports concerning the presence of *Clostridium perfringens* reported the results as "below 10 colony forming units (CFU)" until 2015. In 2015 an official regional laboratory developed a new method to detect the presence of Clostridium *perfringens* based on ISO 7937:2005 and other national standards. This method was subsequently validated and has been officially used by all relevant official laboratories in Poland, since September 2015. Since then, all analytical reports have been reporting the results as presence/absence in 1 g of PAP, as required by legislation.

24. The audit team noted that records of process parameters used during the validation period were also available in the validation file kept by the DVO in charge of controls of one of the two afore-mentioned processing plants. In the second plant the local inspector explained that process parameters were verified during the 30 days validation, as required by Article 8 and point G(1), Chapter III of Annex IV to Commission Regulation (EC) No 142/2011, although no records were available at the time of the audit to prove this assertion.

5.2.2 Requirements for identification and traceability of PAP produced and traded to and from other Member States

25. In general, checks on commercial documents and other relevant records (e.g. weighbridge records, commercial invoices, etc.) accompanying consignments of raw ABP and PAP and other relevant records (e.g. intake and dispatch registers) are regularly carried out during inspections and these checks are recorded in several points of the relevant checklists (see finding 13). All officials met were familiar with relevant requirements. In each of the premises visited, the audit team cross-checked a random sample of these documents. In general they were in line with the relevant requirements and did not contradict the findings made in the reports of official controls.

26. In the multi species Category 3 ABP processing plant the business operator explained that, the presence of ABP of ruminant origin could not be excluded from its extensive supplier network of ABP. The audit team identified that some of this plant's suppliers (e.g. multi-species slaughterhouses) were not listed in the list of food operators eligible to supply ABP of non-ruminant origin. Furthermore, this particular processing plant was not listed as an ABP processing plant eligible for the production of PAP for

aquaculture. Nonetheless, the plant had a contract with an ABP plant located in another Member State to supply it with “ruminant free” Category 3 PAP. From April 2018 a number of consignments had been dispatched to the recipient with the relevant commercial document in TRACES reporting “avian” as animal species but no analytical reports were available to prove the absence of ruminant proteins or, given the source material, verify that it only contained avian and not porcine protein. More importantly, the discrepancy between the status of the processing plant (as not eligible to produce "ruminant free" PAP) and the above contract had not been identified or recorded during official controls, thus, potentially fraudulent trade of PAP had taken place. After the visit, the local DVO provided to the audit team evidence that the relevant commercial documents used in TRACES for all the above consignments had been changed by the competent authority, including the following wording, in the new description of species: "aves" and "mammalia”.

27. In the trader visited by audit team, the relevant DVO had required him to keep a list of records of all consignments purchased and sold. Based on this list the audit team reviewed a number of commercial documents and other records related to various consignments of PAP which were in line with the relevant requirements. Adequate checks in this regard had been regularly carried out as planned by the competent authority although there were a few inconsistencies in the information reported in TRACES where, in some cases the trader was identified as "consignor" and in other cases the consignor was the producer of the PAP.

28. Notwithstanding the provision of training and instructions on the topic (see findings 5 and 13) the arrivals of consignments of PAP are not always confirmed by the Polish authorities to the competent authorities of the Member State of origin by means of TRACES, contrary to Article 48(3) of Regulation (EC) No 1069/2009. In 2016 and 2017 between 25 and 30% of such arrivals were not notified and in 2018 this was the case for around 50% of all consignments. By way of explanation of possible reasons for this non-compliance, the competent authorities stated that this year an increased amount of human resources had to be allocated to tackle the current African Swine Fever situation.

29. The audit team noted that the Polish competent authorities deem that organic fertilisers and soil improvers (OF/SI) containing PAP are not included in the scope of Article 48(3) of Regulation (EC) No 1069/2009. Consequently, departures of consignments of OF/SI containing PAP are not notified in TRACES, contrary to the Commission's interpretation of the provisions laid down in the above Article.

5.2.3 Exports and imports of PAP

30. Consignments of PAP containing ruminant proteins are exported mostly via Gdansk BIP which was visited by the audit team. At that point of exit, in line with the derogation permitted by Section E, point 1(c) of Chapter V, Annex IV to Regulation (EC) No 999/2001, the verification of the seal of consignments is carried out with a reduced

frequency according to risk criteria. In Poland, the seals of around 47% of such consignments have been verified at the points of exit in 2018.

31. Imports of PAP concern exclusively fishmeal. Based on the information gathered by the audit team, official samples to verify compliance with microbiological criteria are taken on a random basis. The audit team saw evidence that the conditions to apply the legally stipulated frequency of controls for this commodity were fulfilled and relevant samples were actually taken and analysed. This is in line with the provision laid down by Section 2, point 2 of Annex XIV to Regulation (EC) No 142/2011.

5.2.4 Follow-up of non-compliances

Legal requirements

Article 46 and 53 of Regulation (EC) No 1069/2009
Articles 54 and 55 of Regulation (EC) No 882/2004

Findings

32. According to national legislation, where irregularities during official controls are found, the DVOs have the legal power to require the operator to rectify these and he can enforce this. During the meetings with the DVOs and the visits to some operators the audit team saw several examples where non-compliances were found during inspections. These concerned HACCP problems, unfavourable test results and issues concerning identification and traceability of PAP and ABP. All non-compliances reviewed by the audit team had been properly followed-up and recorded by the competent authority.

5.2.5 Conclusions on the implementation of official controls on the production and trade of PAP

33. In general, operators' obligations regarding hygienic production and trade of PAP are regularly verified by the competent authorities as planned and non-compliances are followed-up as required. An isolated instance concerning the contamination of Category 3 ABP with Category 2 ABP was identified by the audit team in one processing plant and additional problems in this regard had been identified between 2016 and 2017 by some local authorities in another region, raising some concerns about the robustness of the official control system. Nonetheless, as in 2018 the situation has been stated as improved and no further indications of such problems were identified by the audit team. There is no evidence of weaknesses in the overall system of official controls requiring to be addressed.

34. Checks on requirements concerning the identification and traceability of PAP produced and traded to or from other Member States are generally carried out as planned, and properly followed up, although the potentially fraudulent trade of ruminant-free PAP had not been identified in one case. The arrival of a significant number of consignments of PAP traded into Poland is not notified to the Member States of origin by means of TRACES and all consignments of OF/SI containing PAP dispatched to other Member States from Poland are not notified in TRACES. This weakness undermines the overall

reliability of the flow of information of the intra-EU-trade of such products.

6 OVERALL CONCLUSIONS

The structure and functioning of the official control system governing the chain of production and trade of processed animal proteins, provides a good basis for assuring that these products fulfil relevant requirements on hygiene and traceability. Nevertheless there are two main shortcomings in the system in that (a) there are errors in the list of food operators eligible to supply ABP for the production of processed animal protein to be used for aquaculture resulting in the possibility of ruminant protein (dairy) being present and (b) the competent authorities have largely not met their notification requirements concerning the arrival of consignments of processed animal proteins from other EU Member States and the dispatch of consignments of organic fertilisers/soil improvers containing processed animal proteins to other Member States. Collectively these shortcomings undermine the reliability of information on intra-EU-trade of such products and the solidity of the feed ban measures concerning the aquaculture sector.

7 CLOSING MEETING

A closing meeting was held on 30 May 2018 with representatives of the central competent authorities. At this meeting, the main findings and preliminary conclusions of the audit were presented by the audit team. The GVI did not indicate any major disagreement with these and presented several actions already taken to address, in particular, the issue concerning the lack of notification of the arrival of PAP from other Member States (finding 28) and the re-issuing of some commercial documents in TRACES (see finding 26).

8 RECOMMENDATIONS

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

No.	Recommendation
1.	To ensure the accuracy of the lists of food establishments eligible to supply ABP for the production of PAP to be used for aquaculture as laid down in Section A, Chapter V of Annex IV to Regulation (EC) No 999/2001. *Recommendation based on conclusion: 15* *Associated finding: 8*
2.	To put in place measures aimed at ensuring that information about the arrival of consignments of PAP is notified to the Member State of origin, by means of the TRACES system, as required by Article 48(3) of Regulation (EC) No 1069/2009.

No.	Recommendation
	Recommendation based on conclusion: 34 *Associated finding: 28*
3.	To put in place measures aimed at ensuring that the departure of consignments of organic fertilisers and soil improvers (OF/SI) containing PAP is notified in the TRACES system as laid down by Article 48(3) of Regulation (EC) No 1069/2009. *Recommendation based on conclusion: 34* *Associated finding: 29*

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=2018-6338

ANNEX 1 – LEGAL REFERENCES

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)
Reg. 142/2011	OJ L 54, 26.2.2011, p. 1-254	Commission Regulation (EU) No 142/2011 of 25 February 2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products and derived products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that Directive
Reg. 999/2001	OJ L 147, 31.5.2001, p. 1-40	Regulation (EC) No 999/2001 of the European Parliament and of the Council of 22 May 2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies
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