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FINAL REPORT OF A MISSION CARRIED OUT IN ESTONIA  
FROM 18 TO 22 OCTOBER 2004 IN ORDER TO REVIEW  
THE ACTION TAKEN BY THE COMPETENT AUTHORITIES  
WITH REGARD TO THE UP-GRADING OF CERTAIN CLASSES  
OF FOOD PROCESSING ESTABLISHMENTS, ANIMAL HEALTH CONTROLS  
AND CONTROLS OVER CERTAIN PRODUCTS OF ANIMAL ORIGIN  
INTENDED FOR HUMAN CONSUMPTION



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## 1. EXECUTIVE SUMMARY

The organisation of the central competent authority (CCA) has changed. A comprehensive training programme for officials has been implemented but training targeted at authorised veterinarians (AVs) has been postponed.

Animal health surveillance and control programmes are implemented according to the annual plan, which defines the work to be done at central and district level and by the AVs on farms. The testing programmes for bovine tuberculosis and brucellosis do not fulfil the requirements of Council Directive 64/432/EEC for a Member State officially free of these diseases. Controls on the supply of milk for human consumption from animals or herds suspected of being affected by bovine tuberculosis are not implemented in accordance with Council Directive 92/46/EEC. Contingency plans have been prepared but plans for the control of foot-and-mouth disease are not fully implemented at district level, as specified in Commission Decision 91/42/EEC. The wildlife vaccination programme for rabies has not yet started due to delays in organisation of the controls for the funds.

The bovine database has been restructured to include details of the current holding for each animal. Although the number of registered holdings has increased, the registration of bovine, ovine, caprine and porcine holdings is incomplete. Cattle and sheep examined on farm holdings and at slaughter establishments were correctly identified. However, pigs were not identified in accordance with the requirements of Article 5 of Council Directive 92/102/EEC. Controls on the authorisation of replacement bovine ear tags are not fully effective and cause delays in the supply of tags to keepers. Control measures in place permit the movement of cattle accompanied by passports that do not include all of the information required by Article 7 of Regulation (EC) No 1760/2000 of the European Parliament and of the Council. Information on the identification and movement of sheep and pigs is not maintained in the form of a holding register, as specified in Council Directive 92/102/EEC. The deadlines specified in Article 7 of Regulation (EC) No 1760/2000 of the European Parliament and of the Council for the notification of bovine births, movements and deaths were not always respected.

The PHARE project to develop new animal register software has been further delayed and is not expected to be operational before autumn 2005. The system for checking the plausibility of information entered into the bovine database is not fully effective. Officials in DVOs can access and make use of the database locally although a limited range of query tools is available. The porcine database does not contain all of the information foreseen in Article 18 of Council Directive 64/432/EEC as amended by Directive 2000/15/EC of the European Parliament and the Council. The information available on bovine herd inspections in relation to animal identification and herd registration is insufficiently detailed and the inspections are not unannounced. Commission Regulation (EC) No 494/98 concerning administrative sanctions in the framework of the system for the identification and registration of bovine animals is not fully implemented.

Establishment approval procedures were generally followed correctly and the establishments visited were operating within the scope and capacities provided for in their approvals. However, a systematic deficiency was noted in relation to the approval of low capacity (LC) red meat establishments in accordance with Article 4, point C (d) of Council Directive 64/433/EEC. The CA has approved LC red meat establishments as wild game establishments, contrary to the conditions specified in Council Directive

92/45/EEC. In some cases where the CA has encountered problems with the approval of establishments corrective action has been incomplete or delayed. The envisaged establishment database has been further delayed but should be operational in January 2005.

All the food processing establishments visited had deficiencies in relation to layout, structure, equipment and maintenance. In LC slaughterhouses deficiencies were also detected in relation to stunning equipment. Only eligible raw materials were used in the establishments visited. According to the 2003 national residue control plan inhibitory substances were detected in 0.5% of tested raw milk samples. The labelling of final products was correct and traceability systems for bovine meat had been established in the red meat establishments visited. Controls on the health marking of products in LC red meat and wild game establishments are not fully effective. Deficiencies related to operational hygiene were seen in the establishments visited. The established HACCP principles and own check programmes were generally well documented. However, not all established programmes were well designed or operated effectively. Controls on animal by-products, including specified risk material, in LC meat establishments are inadequate.

Audits of the district CA and AVs were planned and carried out. However, some audits were delayed and others were not fully effective. The official supervision of establishments and farm holdings was carried out according to plan and was well-documented. Plant supervision was generally acceptable but not all deficiencies detected by the mission team had been noted by the official inspectors. The official supervision of farm holdings was carried out according to the foreseen frequency and was well-documented. Records and husbandry on visited farms were generally adequate. However, some of the calves were tethered and sick piglets were not killed but left to die on the porcine farm.

## 2. ABBREVIATIONS & SPECIAL TERMS

AH	Animal Health
AI	Avian Influenza
AM	Ante Mortem
ARIB	Agricultural Registers and Information Board
AV	Authorised Veterinarian
CA	Competent Authority (Authorities)
CCA	Central Competent Authority (Authorities)
CDB	Central databases
CSF	Classical Swine Fever
CVO	Chief Veterinary Officer
DVO	District Veterinary Office (Offices)
EBL	Enzootic Bovine Leucosis
EU	European Union
FVO	Food and Veterinary Office
FMD	Foot- and-mouth disease
HACCP	Hazard Analysis Critical Control Plan
HC	High capacity
LC	Low capacity
ND	Newcastle Disease
PM	Post Mortem
SRM	Specified risk material
Tb	Bovine tuberculosis
VFB	Veterinary and Food Board

### **3. INTRODUCTION**

The mission took place in Estonia from 18 to 22 October 2004. The mission team comprised two inspectors from the Food and Veterinary Office (FVO).

The mission was undertaken as part of the FVO's planned mission programme.

The inspection team was accompanied during part of the mission by a representative from the central competent authority the Estonian Ministry of Agriculture – Veterinary and Food Board (VFB).

An opening meeting was held on 18 October with VFB. At this meeting, the objectives of, and itinerary for, the mission were confirmed by the inspection team, and additional information required for the satisfactory completion of the mission was requested.

### **4. BACKGROUND TO THIS MISSION**

This mission was the first FVO mission in the specified sectors since the accession of Estonia to the EU. Prior to accession, the FVO carried out missions in the framework of the accession preparations of Estonia, in order to assist and monitor progress with the adoption of the relevant EU requirements. Following these missions, recommendations were *inter alia* made with regard to the following points:

- To re-evaluate all red meat establishments and dairy establishments with limited production in order to detect deficiencies in relation to structure, layout, equipment and maintenance as identified by the mission team and to take the appropriate measures to rectify the outstanding non-compliances,
- to re-evaluate all low capacity (LC) red meat establishments in Estonia in order to verify the actual slaughter/cutting throughputs and to continue monitoring the throughput in these establishments in order to avoid them becoming high capacity (HC) establishments without fulfilling the relevant requirements,
- to ensure that EU requirements for establishments in the red meat and dairy sectors are enforced.
- to enforce controls on heat-treatment equipment in dairy establishments to ensure they fulfil the requirements of Council Directive 92/46/EEC,
- to provide the Commission services with an up-to-date and correct overview of the situation of establishments and lists of the establishments and their activities in the different agri-food sectors, and
- to take urgent action in order to solve outstanding issues in relation to bovine and porcine identification, holding registration, the central databases (CDBS) and movement controls and to provide the Commission services with deadlines for these actions.

Following these missions the competent authority undertook to take the relevant corrective actions in response to recommendations made.

## 5. OBJECTIVES OF THE MISSION

The objective of the mission was to review the action taken by competent authorities for the upgrading of certain classes of food-processing establishments and animal health controls in response to previous FVO missions and to evaluate the controls over certain products of animal origin intended for human consumption in the framework of the Community legislation listed in Annex 1.

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

COMPETENT AUTHORITY VISITS			Comments
Competent authority	Central	1	Food and Veterinary Board
	Central	1	Agricultural Registers and Information Board (ARIB)
	Regional	2	District Veterinary Offices (DVOs)

LIVE ANIMAL CONTROL SITES		Comments
Farms	4	2 cattle, 1 pig and 1 sheep farm

The table below indicates the number of activities evaluated by the mission team in food processing establishments. One establishment can have more than one activity.

ACTIVITIES IN FOOD PROCESSING ESTABLISHMENTS	Activities in total		
	HC establishments	LC establishments	Total
Slaughterhouses (red meat)	1	2	3*
Cutting premises (red meat)	1	2	3
Wild game processing	2**		2
Meat product premises (red meat)	1	1	2
Minced meat and meat preparation premises	1	2	3
Milk processing premises	1	0	1
<b>Total</b>	<b>7</b>	<b>7</b>	<b>14</b>

\* In addition 1 closed slaughterhouse was visited to verify that it had ceased activity.

\*\* One of these plants was an LC red meat plant approved also for processing of wild game.

## 6. MAIN FINDINGS AND CONCLUSIONS

### 6.1. Competent authorities

#### Conclusions

*The organisation of the central competent authority (CCA) has changed. A comprehensive training programme for officials has been implemented but training targeted at authorised veterinarians (AVs) has been postponed.*

## Findings

The following legislative changes affecting the structure and operation of the CA were introduced in spring 2004:

- Act on Trade, Exports and Imports of Live Animals and Animal Products of 22.4.2004, and
- Ministerial Decree 29 on the structure and staff of the Food and Veterinary Board of 31.3.2004, amended 11.8.2004.

The Estonian CA has a clear structure and is responsible for veterinary controls, food safety, market regulation and farm animal breeding. The CA consists of the central office of the Veterinary and Food Board (VFB), which is a governmental agency operating under the Ministry of Agriculture, and 15 District Veterinary Offices (DVOs). The VFB has five main departments:

- 1) Animal Health and Welfare
- 2) Food
- 3) Trade, Import and Export
- 4) Animal Breeding and Market Regulation
- 5) General.

Since the FVO mission in February 2004 the former Border Veterinary Service has been transformed into the Department of Trade, Imports and Exports and now operates directly under the VFB.

Evidence of the implementation of the annual training programme for officials responsible for animal and public health and animal welfare, was seen both at CCA and district CA level. The programme for 2004 was extensive and included public and animal health and animal welfare topics. Plans to provide formal training for AVs have been postponed, although regular local meetings for these veterinarians were held in each of the districts visited. The training programme for 2005 will be decided in December 2004.

The CCA followed its annual programme to audit the DVOs and AVs. However, qualitative deficiencies in the work carried out by AVs had not been detected.

## **6.2. Animal health controls**

### Conclusions

*Animal health surveillance and control programmes are implemented according to the annual plan, which defines the work to be done at central and district level and by the AVs on farms.*

*The testing programmes for bovine tuberculosis (TB) and brucellosis do not fulfil the requirements of Council Directive 64/432/EEC for a Member State officially free of these diseases.*

*Controls on the supply of milk for human consumption from animals or herds suspected of being affected by TB are not implemented in accordance with Council Directive 92/46/EEC.*

*Contingency plans have been prepared but plans for the control of foot-and-mouth disease (FMD) have not been fully implemented at district level, as specified in Commission Decision 91/42/EEC.*

*The wildlife vaccination programme for rabies has not yet started due to delays in organisation of the controls for the funds.*

### Findings

The following changes to animal health legislation were introduced during spring 2004:

- Amendments of Infectious Disease Control Act of 17.3.2004 and 22.4.2004, and
- Ministerial Decree on tuberculosis control of 23.4.2004.

The animal health surveillance and control programme is conducted according to an annual plan, which is agreed at the start of each year. AVs carry out testing, vaccination and inspection duties under the supervision of DVO officials. They also issue veterinary movement certificates, which are required before any internal livestock movement between holdings may take place. AVs provide a monthly report on their activities to the DVO. Quarterly reports on progress against the annual plan are submitted to the VFB by each DVO. Evidence that the plan has been followed was found in each of the DVOs visited.

### *Eradication programmes for TB, brucellosis and enzootic bovine leucosis*

Estonia has not yet applied to the European Commission for officially free status for bovine brucellosis, TB and *Brucella melitensis* in sheep and goats.

The following table shows the numbers of herds and animals tested and the number of positive cases for TB, brucellosis and Enzootic bovine leucosis (EBL) for the last three years:

Year	Tested herds	Tuberculosis		Brucellosis		Enzootic bovine Leucosis	
		Tested animals	Positive cases	Tested animals	Positive cases	Tested animals	Positive cases
2001	9,424	179,910	0	41,801	0	116,722	16
2002	9,371	178,838	0	38,139	0	110,917	14
2003	9,180	149,813	0	32,450	0	103,146	4
<b>Total</b>	<b>27,975</b>	<b>508,561</b>	<b>0</b>	<b>112,390</b>	<b>0</b>	<b>330,785</b>	<b>34</b>

According to the CCA annual testing for TB is confined to dairy cows, bulls and other bovines aged more than 24 months. Evidence was found that the intradermal comparative test was not always carried out following a positive result to the single intradermal test, which was contrary to CA procedures.

This had not been detected by the CA auditing the performance of the AV in question.

No controls are in place to regulate the supply and use for human consumption of milk collected from cows giving positive TB test results. No controls are in place to prevent the sale or supply of raw milk for human consumption from suspect herds.

For brucellosis, herds are considered to be officially free of disease if the annual enzyme-linked immunosorbent assay (ELISA) on a pooled milk sample is negative. The notification of cases of abortion to the CA is mandatory and cases are investigated by VFB. During 2003, 11 aborted foetuses were examined for brucellosis and all gave negative results.

The national authorities are preparing a claim to be declared officially free of EBL. Herds are monitored annually using milk samples collected by AVs – a pooled sample from 10 milking cows in each herd is submitted.

#### *Monitoring programme for Classical Swine Fever (CSF)*

The last reported outbreak of CSF in Estonia occurred in 1994.

During 2003, 5,417 ELISA tests were carried out in domestic pigs to detect antibodies against CSF. No positive reactors were found. The sampling programme for 2004 also covers wild boars - 100 animals are to be tested from an estimated wild boar population of 8,000.

#### *Contingency planning*

Contingency plans have been prepared for Avian Influenza (AI), Newcastle Disease (ND), CSF and FMD. Plans for other diseases, including African Horse Sickness, Bluetongue, Vesicular Stomatitis, Rinderpest and Sheep and Goat Pox have been drafted and should be finalised early in 2005.

An epizootic disease simulation exercise covering AI and ND was carried out this summer and involved 44 participants from the VFB. The exercise included a seminar on the disease with presentations given by experts from other MS. The exercise resulted in practical recommendations for improvements in the areas of killing, communications and compensation.

Contingency plans were also available at DVO level. Sampling kits to be used by veterinarians investigating a case of suspected epizootic disease were available at DVOs. However, they lacked sampling media for FMD. Furthermore, the veterinary medicines included in the kits had expired. No procedure has been established to keep these kits and contact details of the responsible persons up-to-date.

#### *Rabies eradication programme*

The number of rabies cases detected annually is fluctuating, as demonstrated in the following table:

Year	Number of positive cases in domestic animals	Number of positive cases in wild animals	Total number of positive cases
2002	68	354	422
2003	116	698	814
2004 (by 30.9.)	46	196	242

n.a. data not analysed

Annual vaccination of dogs and cats is compulsory and state-funded; vaccination of other domestic and farm animals is not compulsory. The last case of human rabies was reported in 1986. The raccoon dog and fox are the main wildlife vectors.

The wildlife vaccination programme has not yet started due to delays in the organisation of the controls for the funds. The aerial distribution of the first set of baits is planned for spring 2005. An area of 28,500 km<sup>2</sup> will be treated twice each year at an estimated cost greater than 80 million EEK for the first two years.

### 6.3. Holding registration, animal identification and movement controls

#### Conclusions

*The bovine database has been restructured to include details of the current holding for each animal. Although the number of registered holdings has increased, the registration of bovine, ovine, caprine and porcine holdings is incomplete.*

*Cattle and sheep examined on farm holdings and at slaughter establishments were correctly identified. Pigs are not identified in accordance with the requirements of Article 5 of Council Directive 92/102/EEC. Controls on the authorisation of replacement bovine ear tags are not fully effective and cause unnecessary delays in the supply of tags to keepers.*

*Control measures in place permit the movement of cattle accompanied by passports that do not include all of the information required by Article 7 of Regulation (EC) No 1760/2000 of the European Parliament and of the Council.*

*Information on the identification and movement of sheep and pigs is not maintained in the form of a holding register, as specified in Council Directive 92/102/EEC.*

*The deadlines specified in Article 7 of Regulation (EC) No 1760/2000 of the European Parliament and of the Council for the notification of bovine births, movements and deaths are not always respected.*

## Findings

### *Central register of holdings*

Progress has been made to extend the coverage of the central register of livestock holdings. ARIB reported that the number of registered holdings (see below) has increased but acknowledged that the task is still incomplete:

Species	Number of holdings
Cattle	12,341
Sheep	2,401
Goats	490
Pigs	3,790

One problem identified previously was the registration of animals in the database according to their owner rather than their holding. This problem is being addressed and the following table shows the total numbers of livestock registered by ARIB, the number for which the current holding is known and the percentage of the total population that this figure represents.

	Total number of livestock	Number of livestock registered to a holding	Percentage of livestock registered to a holding
Cattle	261,029	233,442	89%
Sheep	41,549	33,896	82%
Goats	1,856	1,189	64%

DVOs also maintained figures on the number of known holdings within the district. However, many were identified as “mixed” – i.e. they contain animals of more than one species but the species present are not defined. As a result it was not possible to provide a definitive census of the number of holdings for each species.

### *Holding registers*

Holding registers on cattle farms were well-maintained and up-to-date. National legislation does not specify the format of the register to be maintained on ovine or porcine holdings. Although the required information on the identity and movement of animals to and from the holding could be found on the sheep and pig farms visited, the information was held in a variety of official (e.g. copies of veterinary movement certificates) and unofficial (e.g. breeding records) forms.

The records maintained on the sheep farms did not include the total number of sheep on the farm nor does the CA require such a census to be carried out annually.

### *Animal identification*

Cattle examined on holdings were identified correctly. Breeding pigs examined on holdings were identified by means of ear tags. The official ear tags used for pigs are hand written and are not tamper-proof.

The CA controls the supply of replacement bovine ear tags to keepers. However, keepers typically have to wait more than three weeks before they receive replacements. The system also permits keepers to receive two replacement ear tags bearing the same number. Replacement ear tags are not marked in a manner to distinguish them from the originals. The CA does not carry out systematic checks on ordering of replacement ear tags and re-tagging.

### *Bovine passports*

The CCA stated that all bovine animals have now been issued with a passport. Passports were available for all of the animals examined on the holdings. However, the movement information on some passports examined at a slaughter premises was incomplete and did not include the details for the last holding. These omissions had not resulted in the refusal of a veterinary certificate for movement from the holding.

### *Notifications of birth and movement*

For cattle, the system for the notification of births, deaths and movements is well-understood and generally functions well. However, notifications are frequently received after the deadlines. The following table categorises the notifications received by the middle of October 2004 for events that occurred in September according to the delay:

	0-3 days	4-7 days	8-20 days	21-27 days	>27 days	Total notifications received
Births	33%	14%	15%	4%	34%	2120
Deaths	37%	17%	29%	5%	12%	2147
Movements	27%	23%	25%	5%	20%	4356

Keepers are required to notify ARIB of movements of pigs to and from holdings within seven days. However, on one pig holding visited the movement of groups of pigs from the holding had not been notified to the CDB.

## **6.4. Central databases and on-the-spot inspections**

### Conclusions

*The PHARE project to develop new animal register software has been further delayed and is not expected to be operational before autumn 2005.*

*The system for checking the plausibility of information entered into the bovine database is not fully effective. Officials in DVOs can access and make use of the database locally although a limited range of query tools is available.*

*The porcine database does not contain all of the information foreseen in Article 18 of Council Directive 64/432/EEC as amended by Directive 2000/15/EC of the European Parliament and the Council.*

*The information available on bovine herd inspections in relation to animal identification and herd registration is insufficiently detailed and the inspections are not unannounced.*

*Commission Regulation (EC) No 494/98 concerning administrative sanctions in the framework of the system for the identification and registration of bovine animals is not fully implemented.*

## Findings

### *Central database*

Differences between the EU requirements concerning holding registration and controls on animal identification and the systems operating in Estonia were identified before Accession. These differences were addressed within a PHARE project under the title of Development of Agricultural Information Management Systems. This project has been delayed by several months and is now expected to be completed by the middle of 2005 at the earliest.

The bovine database includes a system for checking the plausibility of information entered. A comprehensive list of errors has been compiled, including errors in the following categories:

- Animal and/or holding numbers invalid,
- Date errors (including format and validity),
- Notifications not consistent with data already recorded, and
- Notifications which are incomplete.

The system reviews the information after it has been entered in and reports any errors at a later time. It was therefore not possible to verify the operation of the system on the spot. However, a case was found where the movement of an animal to a non-existent slaughterhouse was recorded in the database without an error being raised.

The porcine database includes information on the movement of pigs.

Officials in DVOs can access the CDBs by means of an internet connection. Users can generate a list of animals registered on a specified holding but are unable to carry out more advanced searches (such as tracing an animal's movements). The systems are used to cross check information entered on export health certificates and on animal disease reports submitted by AVs.

### *On the spot inspections*

Currently 100% of holdings are inspected each year by AVs (as part of the annual animal health inspection carried out in accordance with the Farm Inspection Act). These inspections have been carried out for several years and include checks that animals are individually identified and that the herd register is up-to-date. The standard report form does not record the number

of animal identification, holding register, passport and notification anomalies detected on each holding. In general, the inspections are timed to coincide with other routine visits to the farm, for example following a request from the keeper for an animal movement veterinary certificate. The results of inspections where infringements are found are not exchanged systematically between VFB and ARIB, the CA responsible for the implementation of Common Agriculture Policy support measures.

#### *Administrative sanctions*

The CCA reported that no action has been taken to destroy unidentified bovine animals where the keeper cannot prove their identity, although the authorities confirmed that national legislation provides for this sanction to be applied. The movement of bovine animals failing to meet identification requirements is prohibited within the framework of the system for veterinary movement certification – no certificate may be issued if animal identification or registration anomalies exist on the farm. Furthermore, animal identification and registration anomalies are reported by the AV to the District Veterinary Officer, who may initiate the procedure for applying financial penalties. The procedures do not cover the movement of animals to or from holdings where keepers fail to notify the CA of births, deaths and movements within prescribed time limits.

### **6.5. Establishment approval**

#### Conclusions

*Establishment approval procedures were generally followed correctly and the establishments visited were operating within the scope and capacities provided for in their approvals. However, a systematic deficiency was noted in relation to the approval of LC red meat establishments in accordance with Article 4, point C (d) of Council Directive 64/433/EEC. The CA has approved LC establishments as wild game establishments, contrary to the conditions specified in Council Directive 92/45/EEC. In some cases where the CA has encountered problems with the approval of establishments corrective action has been incomplete or delayed.*

*The envisaged establishment database has been further delayed but should be operational in January 2005.*

#### Findings

Procedures for the approval of food processing establishments were followed correctly and approvals were available and up-to-date for all establishments visited. In the districts visited the limits on throughput of LC establishments were monitored and respected. However, several LC red meat establishments benefited from derogations in relation to the maximum amounts slaughtered (1500 livestock units/year). For the establishments visited these derogations were not in accordance with Article 4, point C (d) of Council Directive 64/433/EEC because only animals of one operator were slaughtered and the CA had not provided the details of the derogation to the Commission services. The Estonian CA provided the mission team with the

full list of establishments subject to this derogation at the final meeting and stated they would also send it officially to the Commission Services.

One LC red meat establishment visited was also approved for wild game but did not fulfil all the requirements for this kind of plant (e.g. taps were hand-operated). The CA stated that wild game meat originating from this kind of plant would only be released to the national market.

The approval for one HC slaughterhouse/LC cutting plant combination, which is not allowed according to Directive 64/433/EEC, had not been changed although the CA was aware of this anomaly before the mission. The CCA explained that this establishment is in the process of being upgraded to a HC cutting plant. Evidence for upgrading was available. However, the progress has been delayed and the new deadline has been set to 31 March 2005.

In one district, the stamps which had been used in a red meat plant which had been suspended were not retrieved until one year after its closure.

The establishment database, which should have been completed by May 2004, was not yet operational and existed only as a limited test version. The new deadline is January 2005.

## **6.6. Food safety controls**

### *6.6.1. Legislation*

#### Conclusions

*The new legislation has taken into account deficiencies noted previously.*

#### Findings

The following legislative changes have been introduced:

- Amendments of the Food Act of 18.4. and 22.4.2004,
- Amendments of the Fresh Meat Act of 26.4. and 21.9.2004,
- Amendments of the Ministerial Decree 44 on hygiene rules for minced meat and meat preparations of 22.4. and 30.9.2004,
- Amendments of Ministerial Decree 45 on hygiene rules for meat products of 22.4, 21.9 and 30.9.2004, and
- Ministerial Decree amending the Hygiene Regulation in relation to use of health mark for meat product.

### *6.6.2. Food processing establishments - structure, layout and equipment*

#### Conclusions

*All the food processing establishments visited had deficiencies in relation to layout, structure, equipment and maintenance. In LC slaughterhouses deficiencies were also detected in relation to stunning equipment.*

## Findings

The mission team observed the following recurrent shortcomings with regard to structure, layout and equipment in the red meat, game meat and milk processing establishments visited:

- Floors and walls not easy to clean and in need of maintenance, insufficient drainage and lack of positive ducting of water,
- Windows easy to open in the processing area and not provided with insect protection,
- Crossing flows in one HC and one LC red meat plant,
- Maintenance problems of equipment and machinery (e.g. leaking milk heat-treatment equipment and milk tank, milk storage tanks with worn out rubber seals, milk storage tanks without thermometers, rusty mincing equipment, cutting boards in poor condition),
- The pasteurisation equipment in the dairy visited lacked an adequate safety system preventing the mixture of heat-treated milk with incompletely heat-treated milk,
- The electric stunning equipment in the two LC slaughterhouses visited was not adequate. In one plant the current /voltage combination of one of the equipments was too low for the pigs (0.6 A/240V). In both LC establishments the devices for indicating voltage and current had deficiencies (lacking or installed in such a way that it was impossible for the operator to see them during the stunning),
- No automatic temperature registration in a room preparing minced meat,
- Equipment for meat processing not of suitable material,
- Hand-operable taps in lavatories in a HC slaughterhouse and cutting plant, and in processing area of a game processing establishments,
- Hand-operable waste baskets in meat processing area, and
- Lack of sufficient numbers of knife sterilisers in parts of the HC combined meat plant.

### *6.6.3. Eligibility of raw material, marking and labelling of final products*

#### Conclusions

*Only eligible raw materials were used in the establishments visited. According to the 2003 national residue control plan inhibitory substances were detected in 0.5% of tested raw milk samples. The labelling of final products was correct and traceability systems for bovine meat had been established in the red meat establishments visited.*

*Controls on the health marking of products in LC red meat and wild game establishments are not fully effective.*

## Findings

According to national raw milk statistics, 93% of the milk collected during 2003 satisfied the somatic cell count and total plate count requirements of Council Directive 92/46/EEC. The raw milk results seen in the dairy visited and on the farms visited generally fulfilled the requirements of Annex A, Chapter IV, of Council Directive 92/46/EEC in relation to somatic cell count (SCC) and total plate count (TPC).

Results from the 2003 national residue plan indicated that 0.5% (7 of 1382) of analysed milk samples contained inhibitory substances. Summary statistics of tests for inhibitory substances in raw milk were not available in the dairy establishments visited. The follow-up investigation on a farm in relation to detection of inhibitory substances in raw milk was carried out late (i.e. 12 days after the incident).

Meat and milk products were correctly labelled and traceability systems for bovine meat had been established in the red meat establishments visited.

The following deficiencies regarding health marking of products were found:

- Pig carcasses were not always correctly health marked in the LC red meat establishments and
- The health mark used in the wild game establishment (see 6.6.5) was a pentagonal stamp similar to that described in Annex I, Chapter VII, point 2(a) of Council Directive 92/45/EEC but without the letters "EEC".

### *6.6.4. Operational hygiene and associated own checks*

#### Conclusions

*Deficiencies related to operational hygiene were seen in the establishments visited.*

*The established HACCP principles and own check programmes were generally well documented. However, not all established programmes were well designed/operated effectively.*

## Findings

With regard to the hygienic conditions in food processing establishments the following recurrent deficiencies were seen.

- Poor cleaning of live animal transport lorries,
- Poor cleaning of equipment (e.g. crates, mincing equipment),
- Use of rodent traps in processing areas and in areas where exposed raw material is present,
- Sterilisers out of order or not functioning correctly,
- Hand-wash facilities not in operation during visit,
- Washing of pig carcasses immediately before entry into chiller,

- Condensation water dripping on carcasses,
- Carcasses entering the cutting plant from the annexed slaughterhouse were not inspected,
- Exposed and packed products stored in the same freezer,
- Repasteurisation of residual butter from the butter cannon as “cream”, and
- Staff not wearing protective masks in the mince meat and meat preparation rooms,
- Staff with chewing gum.

All establishments visited had documented HACCP and own control programmes in operation. However, not all established programmes were well designed or operated effectively. For example, deficiencies were noted in relation to the implementation of cleaning and disinfection and pest control.

#### 6.6.5. *Animal By-Products*

##### Conclusions

*Controls on animal by-products, including SRM, in LC meat establishments are inadequate.*

##### Findings

The CCA reported that plans for the approval of an establishment for the incineration of animal wastes are advanced. The plant, which was funded by the State and will be operated by an agency, is currently being tested and is expected to be approved before the end of the year. The plant will receive animal by-products from food processing establishments and animal carcasses directly from farms.

Currently all Category I and II wastes, including SRM collected from meat slaughter and processing establishments and carcasses of fallen animals are disposed of at approved burial sites, in accordance with Commission Decision 2004/467/EC<sup>1</sup>.

At the HC slaughter establishment visited effective controls were in place for the removal, segregation and staining of SRM. At one of the LC red meat slaughter establishments visited Category I & II animal by-products were not adequately segregated from meat for human consumption and from Category III wastes. In this establishment SRM (spinal cord) was found attached to a health marked carcass in the chilling room. In the other LC red meat slaughter establishment visited, animal by-products were kept separate from meat for human consumption. However, bins for the storage of animal by-products were not labelled.

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<sup>1</sup> OJ L 160, 30/04/2004, p.1

## 6.7. Competent authority supervision

### Conclusions

*Audits of the district CA and AVs were planned and carried out. However, some audits were delayed and others were not fully effective.*

*The official supervision of establishments and farm holdings was carried out according to plan and was well-documented. Plant supervision was generally acceptable but not all deficiencies detected by the mission team had been noted by the official inspectors.*

*Records and husbandry on visited farms were generally adequate. However, no actions had been taken by the CA in relation to calves that were tethered and in relation to the practice on the farm visited to let sick piglets die without treatment.*

### Findings

#### *Inspections of food processing plants*

In the districts visited inspections of the LC red meat plants and dairy establishments had been carried out following the frequencies given by the CCA. According to its instructions the CCA of the Food Department should inspect all HC red meat plants and dairy plants at least once annually. However, not all HC red meat establishments had been inspected in the time frame originally planned and at the time of the FVO mission five HC red meat plants still needed to be visited in 2004.

A separate audit programme, covering all the districts, has been set up to audit the districts officers responsible for LC red meat establishments. According to this programme all districts have to be visited annually, including inspection of at least one LC meat establishment. Twelve of the 15 districts had been audited in 2004 by the time of the FVO mission and reports were available for these audits.

The CA responsible for the evaluation of the visited establishments had generally carried out this task correctly. Inspection reports were available and reports were available for the visited establishments. However, not all the deficiencies noted by the inspection team had been spotted by the CA responsible for the plant supervision and in some cases no proper action had been taken to eliminate the deficiencies.

#### *In-plant supervision*

The ante mortem (AM) and post mortem (PM) documentation was in general adequate. The AV carrying out the AM and PM inspection in one LC establishment did not inspect the heads of the pig carcasses and was using a steriliser with lukewarm water to disinfect his knives. In one LC slaughterhouse the inspection for trichinae was carried out using the compression method combined with microscopic examination.

In the dairy establishment visited the official veterinarian responsible for the plant was not familiar ease with the interpretation of the heat-treatment thermograph.

#### *Farm inspections*

In the DVOs visited farm inspections were well documented. The dairy farms are inspected annually as a prerequisite for milk delivery to the dairy. The CCA reported that in the first three quarters of 2004 the total number of farms inspected was 4,415, covering 151,361 bovine animals. Of these inspections 1,267 were targeted at dairy farms.

The district veterinary officers do not systematically supervise the AVs carrying out TB testing.

#### *Animal welfare*

Although the CA responsible for the LC slaughterhouse supervision had attended training on animal welfare at slaughter they had still allowed the stunning of pigs with stunning equipment not fulfilling all requirements of Council Directive 93/119/EC<sup>2</sup>.

On the cattle farms visited some calves were kept tethered and on the pig farm visited no provisions existed to euthanise sick piglets, which were left to die.

## **7. OVERALL CONCLUSION**

The CA has taken into account most of the recommendations made previously. However, the progress in the field of herd registration, animal identification and central databases has been further delayed, as has the development of the establishment database and the implementation of the wildlife vaccination programme. Although the control systems in place in relation to food processing establishments and animal health controls are principally well developed and effective, compliance with Community legislation is incomplete in some areas.

## **8. CLOSING MEETING**

A closing meeting was held on 22 October 2004 with the central competent authority, the Estonian Ministry of Agriculture, VFB. At this meeting, the main findings and conclusions of the mission were presented by the inspection team.

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<sup>2</sup> OJ 340, 31,12,93, p.21

## **9. RECOMMENDATIONS**

### **9.1. To the competent authorities of Estonia**

- 1) To ensure that controls on the supply of milk for human consumption, (particularly in regard to milk from TB suspect herds or animals and milk containing inhibitory substances) are brought in line with Council Directive 92/46/EEC.
- 2) To complete the registration of bovine, ovine, caprine and porcine holdings as foreseen in Council Directive 92/102/EEC and Regulation (EC) No 1760/2000 of the European Parliament and of the Council.
- 3) To transpose the requirements of Council Directive 92/102/EEC concerning the holding register for sheep and pigs and the identification of pigs.
- 4) To ensure that the inspection of bovine holdings within the framework of identification and registration is carried out in accordance with Commission Regulation (EC) No. 1082/2003 and that administrative sanctions are applied as foreseen in Commission Regulation (EC) No 494/98.
- 5) To review approvals issued to establishments in accordance with Article 4, point C (d) of Council Directive 64/433/EEC and to provide the Commission Services with a list of establishments benefiting from these provisions.
- 6) To ensure that approved wild game processing establishments fulfil all requirements of Council Directive 92/45/EEC.
- 7) To enforce health marking requirements for meat products in accordance with the requirements of Council Directives 64/433/EEC and 92/45/EEC.
- 8) To enforce the requirements of (EC) No 1774/2002 of the European Parliament and of the Council on animal by-products, as amended by Commission Decision 2004/467/EC.
- 9) To ensure that the welfare of slaughtered animals is protected in accordance with the requirements of Council Directive 93/119/EC and that the welfare of calves kept on farm holdings is protected in accordance with the requirements of Council Directive 91/629/EEC.
- 10) To rectify deficiencies in areas noted during the mission.

The Estonian authorities should submit an action plan, detailing the actions taken and planned, and including deadlines for their implementation to address the above recommendations within one month after receiving the draft report.

## **10. ADDENDUM**

The Estonian CA, by means of an email received from the Veterinary and Food Board on 3.1.2005, offered some comments that have been largely incorporated into the final report. They also provided an action plan to address the recommendations in the report.

## 11. ANNEX 1: LEGISLATION

### LEGAL BASIS FOR THE MISSION

European legislation	OJ	Title
Council Directive 64/432/EEC	L 121, 29.07.1964, p. 1977	Council Directive 64/432/EEC of 26 June 1964 on animal health problems affecting intra-Community trade in bovine animals and swine
Council Directive 64/433/EEC	L 121, 29.07.1964, p. 2012	Council Directive 64/433/EEC of 26 June 1964 on health conditions for the production and marketing of fresh meat
Council Directive 77/99/EEC	L 026, 31.01.1977, p. 85	Council Directive 77/99/EEC of 21 December 1976 on health problems affecting the production and marketing of meat products and certain other products of animal origin
Council Directive 91/495/EEC	L 268, 24.09.1991, p.41	Council Directive 91/495/EEC of 27 November 1990 concerning public health and animal health problems affecting the production and placing on the market of rabbit meat and farmed game meat
Council Directive 92/45/EEC	L 268, 14.09.1992, p. 35	Council Directive 92/45/EEC of 16 June 1992 on public health and animal health problems relating to the killing of wild game and the placing on the market of wild-game meat
Council Directive 92/46/EEC	L 268, 14.09.1992, p. 1	Council Directive 92/46/EEC of 16 June 1992 laying down the health rules for the production and placing on the market of raw milk, heat-treated milk and milk-based products
Council Directive 92/102/EEC	L 355, 05.12.1992, p. 32	Council Directive 92/102/EEC of 27 November 1992 on the identification and registration of animals
Council Directive 94/65/EC	L 368, 31.12.1994, p. 10	Council Directive 94/65/EC of 14 December 1994 laying down the requirements for the production and placing on the market of minced meat and meat preparations
Council Directive 97/78/EC	L 24, 30.01.98, p. 9	Council Directive of 18 December 1997 laying down the principles governing the organisation of veterinary checks on products entering the Community from third countries.
Regulation of the European Parliament and of the Council (EC) No. 1760/2000	L 204 , 11.08.2000, p. 1	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
Council Directive 2001/89/EC	L 316 , 01.12.2001, p. 5	Council Directive 2001/89/EC of 23 October 2001 on Community measures for the control of classical swine fever
Council Directive 2003/85/EC	L 306, 22.11.2003, p.1	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
Commission Decision 98/139/EC	L 038, 12.02.1998, p. 10	Commission Decision 98/139/EC of 4 February 1998 laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in Member States

## RELEVANT COMMUNITY LEGISLATION IN THE FRAMEWORK OF THIS MISSION

European legislation	OJ	Title
Council Directive 72/461/EEC	L 302, 31.12.1972, p. 24	Council Directive 72/461/EEC of 12 December 1972 on health problems affecting intra-Community trade in fresh meat
Council Directive 77/96/EEC	L 026, 31.01.1977, p. 67	Council Directive 77/96/EEC of 21 December 1976 on the examination for trichinae ( <i>Trichinella spiralis</i> ) upon importation from third countries of fresh meat derived from domestic swine
Council Directive 77/391/EEC	L 145, 13.06.1977, p. 44	Council Directive 77/391/EEC of 17 May 1977 introducing Community measures for the eradication of brucellosis, tuberculosis and leucosis in cattle
Council Directive 80/215/EEC	L 047, 21.02.1988, p. 4	Council Directive 80/215/EEC of 22 January 1980 on animal health problems affecting intra-Community trade in meat products
Council Directive 89/397/EEC	L 186, 30.6.1989, p. 23	Council Directive 89/397/EEC of 14 June 1989 on the official control of foodstuffs
Council Directive 89/662/EEC	L 395, 30.12.1989, p. 13	Council Directive 89/662/EEC of 11 December 1989 concerning veterinary checks in intra-Community trade with a view to the completion of the internal market
Council Directive 90/423/EEC	L 224, 18.08.1990 p. 13	Council Directive 90/423/EEC of 26 June 1990 amending Directive 85/511/EEC introducing Community measures for the control of foot-and-mouth disease, Directive 64/432/EEC on animal health problems affecting intra-Community trade in bovine animals and swine and Directive 72/462/EEC on health and veterinary inspection problems upon importation of bovine animals and swine and fresh meat or meat products from third countries
Council Directive 91/68/EEC	L 046, 19.02.1991, p. 19	Council Directive 91/68/EEC of 28 January 1991 on animal health conditions governing intra-Community trade in ovine and caprine animals
Council Directive 92/45/EEC	L 268, 14.09.1992, p. 35	Council Directive 92/45/EEC of 16 June 1992 on public health and animal health problems relating to the killing of wild game and the placing on the market of wild-game meat
Council Directive 92/46/EEC	L 268, 14.09.1992, p. 1	Council Directive 92/46/EEC of 16 June 1992 laying down the health rules for the production and placing on the market of raw milk, heat-treated milk and milk-based products
Council Directive 92/118/EEC	L 062, 15.03.1993, p. 49	Council Directive 92/118/EEC of 17 December 1992 laying down animal health and public health requirements governing trade in and imports into the Community of products not subject to the said requirements laid down in specific Community rules referred to in Annex A (I) to Directive 89/662/EEC and, as regards pathogens, to Directive 90/425/EEC
Council Directive 93/99/EEC	L 290, 24.11.1993, p. 14	Council Directive 93/99/EEC of 29 October 1993 on the subject of additional measures concerning the official control of foodstuffs
Council Directive 93/119/EC	L 340, 31.12.1993, p. 21	Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing

European legislation	OJ	Title
Council Directive 96/22/EC	L 125, 23.05.1996, p. 3	Council Directive 96/22/EC of 29 April 1996 concerning the prohibition on the use in stockfarming of certain substances having a hormonal or thyrostatic action and of $\beta$ -agonists, and repealing Directives 81/602/EEC, 88/146/EEC, 88/299/EEC
Council Directive 96/23/EC	L 125, 23.05.1996, p. 10	Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC
Council Directive 96/93/EC	L 013, 16.01.1997, p. 28	Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products
Council Directive 98/83/EC	L 330, 05.12.1998, p. 32	Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption
Commission Regulation (EC) No 494/98	L 060, 28.02.1998, p. 78	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
Commission Regulation (EC) No. 1825/2000	L 216, 26.08.2000, p. 8	Commission Regulation (EC) No 1825/2000 of 25 August 2000 laying down detailed rules for the application of Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards the labelling of beef and beef products
Regulation (EC) No 178/2002	L31, 01.02.2002, p.1	Regulation of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety.
Regulation of the European Parliament and of the Council (EC) No 1774/2002	L 273, 10.10.2002, p. 1	Regulation (EC) No 1774/2002 of the European Parliament and of the Council of 3 October 2002 laying down health rules concerning animal by-products not intended for human consumption
Commission Regulation (EC) No 1082/2003	L 156, 25.06.2003, p. 9	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
Commission Regulation (EC) No 911/2004	L 163, 30.04.2004, p. 65	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
Council Decision 90/424/EEC	L 224 , 18.08.1990, p. 19	Council Decision 90/424/EEC of 26 June 1990 on expenditure in the veterinary field

European legislation	OJ	Title
Council Decision 90/638/EEC	L 347, 12.12.1990, p. 27	Council Decision 90/638/EEC of 27 November 1990 laying down Community criteria for the eradication and monitoring of certain animal diseases
Commission Decision 91/42/EEC	L 023, 29.01.1991 p. 29	Commission Decision 91/42/EEC of 8 January 1991 laying down the criteria to be applied when drawing up contingency plans for the control of FMD, in application of Article 5 of Council Directive 90/423/EEC
Commission Decision 2001/471/EC	L165, 21.06.2001, p.48	Commission Decision of 8 June 2001 laying down rules for the regular checks on the general hygiene carried out by the operators in establishments according to Directive 64/433/EEC on health conditions for the production and marketing of fresh meat and Directive 71/118/EEC on health problems affecting the production and placing on the market of fresh poultry meat
Transitional measures specified in the relevant Annex to the Act of the Accession of the country		