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Directorate F - Food and Veterinary Office

DG(SANCO)/7612/2005 – MR Final

FINAL REPORT OF A MISSION

CARRIED OUT IN POLAND

FROM 17 TO 28 OCTOBER 2005

IN ORDER TO REVIEW THE UP-GRADING OF CERTAIN CLASSES OF FOOD PROCESSING ESTABLISHMENTS, CONTROLS OVER CERTAIN PRODUCTS OF ANIMAL ORIGIN INTENDED FOR HUMAN CONSUMPTION, CERTAIN LIVE ANIMAL CONTROLS, AND CONTINGENCY PLANS FOR EPIZOOTIC DISEASES

Please note that clarifications provided by the Polish Authorities are given as footnotes, in bold, italic, type, to the relevant part of the report

TABLE OF CONTENTS

ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT 3

1. INTRODUCTION 4

2. OBJECTIVES OF THE MISSION 4

3. LEGAL BASIS 5

4. MAIN FINDINGS 5

4.1. Competent authority performance 5

4.2. Holding registration, animal identification and movement controls 6

4.3. Establishment upgrading and approval 8

4.4. Food safety controls 9

4.5. Animal welfare at slaughter 11

4.6. Animal health controls 11

4.7. Contingency Plans 12

4.8. Miscellaneous 17

5. CLOSING MEETING 17

6. CONCLUSIONS 18

6.1. Competent authority performance 18

6.2. Holding registration, animal identification and movement controls 18

6.3. Establishment upgrading and approval 18

6.4. Food safety controls 19

6.5. Animal welfare at slaughter 19

6.6. Animal health controls 19

6.7. Contingency Plans 19

6.8. Miscellaneous 20

7. RECOMMENDATIONS TO THE COMPETENT AUTHORITIES OF POLAND 20

ADDENDUM 21

ANNEX – LEGAL REFERENCES 22

ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

AI	Avian Influenza
ARMA	Agency for Restructuring and Modernisation of Agriculture (*Agencja Restrukturacji i Modernizacji Rolnictwa*)
CA	Competent Authority
CCA	Central Competent Authority
CDB	Central Database (cattle and pigs)
CFU	Cell Forming Units
CSF	Classical Swine Fever
CVO	Chief Veterinary Officer
DG(SANCO)	Health & Consumer Protection Directorate General (EC)
DVO	District Veterinary Officer / Office (*Powiat*)
EBL	Enzootic Bovine Leucosis
EC	European Commission
EU	European Union
FMD	Foot and Mouth Disease
FVO	Food and Veterinary Office
GVI	General Veterinary Inspectorate (*Główny Inspektorat Weterynarii*)
HACCP	Hazard Analysis & Critical Control Points
MARD	Ministry of Agriculture and Rural Development
ND	Newcastle Disease
NRL	National Reference Laboratory
OV	Official Veterinarian
RVO	Regional Veterinary Officer / Office (*Voivod*)
TAIEX	Technical Assistance and Information Exchange unit (EC)

1. INTRODUCTION

The mission took place in Poland from 17 to 28 October 2005. The mission team comprised 4 inspectors from the Food and Veterinary Office (FVO) in the first week and 6 inspectors during the second week of the mission.

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

The inspection team was accompanied during the mission by representatives from the Central Competent Authority (CCA), the General Veterinary Inspectorate (GVI – *Główny Inspektorat Weterynarii*) under the Ministry of Agriculture and Rural Development (MARD).

An opening meeting was held on 17 October 2005 in Warsaw with the CCA. 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 requested.

2. OBJECTIVES OF THE MISSION

The objectives of the mission were to review:

- the follow-up action taken by the CCA with regard to the up-grading of certain classes of food-processing establishments (red meat and milk);
- the operation of controls over certain products of animal origin intended for human consumption (fresh meat, meat products, minced meat and meat preparations, milk and milk products, farmed game and wild game);
- holding registration, animal identification and movement controls;
- certain animal health controls (tuberculosis, brucellosis, classical swine fever);
- the contingency plans for epizootic diseases, in particular Classical Swine Fever (CSF), Foot-and-Mouth Disease (FMD), Avian Influenza (AI), Newcastle Disease (ND).

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

COMPETENT AUTHORITY VISITS			Comments
Competent authority	Central	5	GVI for opening, closing and intermediary meetings, the National Crisis Coordination Centre, the Central Database (CDB)
	Regional	7	RVO offices (*Voivod*), Agency for Structuring and Modernisation of Agriculture (ARMA) offices
	District	10	DVO offices (*Powiat*), ARMA offices, Local Disease Coordination Centres
	Local	11	At establishment level

FOOD PROCESSING ESTABLISHMENTS		Comments
Slaughterhouses	5	
Game meat premises	1	Wild game processing house
Cutting premises	6	5 integrated in slaughterhouse, 1 independent
Meat product premises	7	5 integrated in slaughterhouse, 1 in cutting plant, 1 in coldstore
Milk processing premises	3	
Coldstores	2	1 with integrated meat products
LABORATORIES		
National Veterinary Laboratory	1	NRL, Pulawy
Regional Veterinary Laboratory	1	
LIVE ANIMAL CONTROL SITES		
Farms	5	Cattle, pigs, sheep, poultry
Assembly centres for live animals	3	Cattle
Dealers	2	Pigs

3. LEGAL BASIS

The mission was carried out under the general provisions of Community legislation and, in particular:

Article 12 of Council Directive 64/433/EEC, Article 12 of Council Directive 77/99/EEC, Article 15 of Council Directive 91/495/EEC, Article 12 of Council Directive 92/45/EEC, Article 17 of Council Directive 92/46/EEC, Article 9 of Council Directive 94/65/EC, Article 10 of Council Directive 77/391/EEC, Article 14 of Council Directive 93/119/EC of 22 December 1993, Article 22 of Regulation (EC) No. 1760/2000 of the European Parliament and of the Council, Article 21 of Council Directive 2001/89/EC, Article 7 of Council Directive 91/494/EEC, Article 18 of Council Directive 92/40/EEC, Article 22 of Council Directive 92/66/EEC, Commission Decision 98/139/EC of 4 February 1998.

References to relevant Community legislation in the framework of this mission are listed in Annex I to the report.

4. MAIN FINDINGS

4.1. Competent authority performance

A new instruction by the CVO on the frequency of inspections within the framework of official supervision in establishments (No GIWhig. 500/2/05) was issued on 2 May 2005. This instruction provides minimum requirements for veterinary supervision in all types of establishments producing or storing foodstuffs of animal origin. Three levels of supervision are required: the official veterinarian (OV) assigned to the establishment, the divisional veterinary office (DVO) and the regional veterinary office (RVO).

Observations:

- The frequency of veterinary supervision was not in all cases respected;
- The different levels of supervision (regional and local) were not always demonstrated or documented in the establishments visited;
- CA inspections from higher levels (RVO and DVO) in establishments did not generally include adequate supervision of the work carried out by the lower CA level.

4.2. Holding registration, animal identification and movement controls

A system of animal identification, holding registration, movement controls and databases for cattle, pigs, sheep and goats is in place in Poland and it's implementation was checked in the 4 regions visited by the animal health sub-team during the mission.

Holding registration and the operation of central databases (CDB) is under the responsibility of the Agency for Restructuring and Modernisation of Agriculture (ARMA), a commercial service under the MARD with a network of offices in all regions and districts of the country.

The CDB for cattle, pigs and sheep and goats has been established in accordance with the relevant EU requirements and is accessible from all ARMA offices. The RVO and DVO can send queries by e-mail to the CDB and access has also been given to named employees from the RVO and DVO, authorising them to search and browse the databases at the ARMA offices. A procedure allowing the RVO and DVO direct access to the CDB via internet connections is being tested and expected to be operational in the near future.

Observations:

- In the cattle, pig and sheep farms and assembly centres visited, all the animals were identified properly;
- A high number of notifications (birth, deaths and movements) are registered late in the CDB. Despite having a system of sending out letters to farmers requesting clarification, and the possibility of follow-up inspections by ARMA in case of unsatisfactory response, no efficient follow-up system, including sanctions, is in place to improve this situation;
- The DVO could not provide a complete list of dealers in the districts visited. In one case all dealers were registered as transporters and could not be separately identified;
- The registration in the CDB of the type of establishment (slaughterhouse, rendering plant, holdings and assembly centres) is based on the operator's declaration and ARMA does not request the DVO to validate this information[1]. As a result two assembly centres for cattle, approved by the DVO for intra-community trade, were registered in the CDB as holdings. Moreover, one of the owners also had another farm that was not registered at the CDB. In one of these

[1] ***In their response to the draft report the Polish authorities noted that although ARMA is not legally obliged to validate the owner's declarations it has intensified actions aimed at verification of data in the CDB with DVO's data.***

assembly centres no animals were present during the visit although a high number of animals were registered in the CDB as being present in the premises;

- Two other premises registered in the database as assembly centres were houses without any facilities for keeping animals. In one of these the owner was present, and stated that he was a dealer without premises carrying out intra-community trade until May 2005. However, he was not registered and approved as a dealer at the DVO in accordance with Council Directive 64/432/EEC. In the other case nobody was present at the house but, based on the data registered in the central database, the situation appeared to be similar;
- No action had been taken by the CA for several months in two of the assembly centres for cattle where several non-conformities had been detected;
- ARMA does not provide any information to the DVO when irregularities are detected in relation to assembly centres and dealers during the validation tests carried out at CDB level[2];
- Inspections in relation to maintenance of the approval of assembly centres and dealers are carried out once a year by the DVO. This frequency is in accordance with the minimum requirement laid down by GVI guidelines, but it is questionable if this can be considered sufficient in order to fulfil the EU requirement of regular supervision.

4.2.1. Inspection of holdings

A programme of on-the-spot inspections in bovine holdings was implemented in January 2005 by trained staff from the DVO. A list containing the 10% of holdings to be inspected is drawn up by the GVI using a risk-based approach. The criteria used for the selection are the number of cattle on the holding, the epizootic status, notification delay of more than 7 days and no notifications for more than 6 months.

Observations:

- The risk-based criteria used when selecting holdings to be checked are not in compliance with Commission Regulation (EC) No. 494/98 as, for example, dealers and assembly centres are not included;
- Up-to the end of September 2005 only 30% of the selected holdings had been inspected, due to a lack of inspection staff;
- Holdings where irregularities are found are subject only to restriction on movements. No other penalties are applied to ensure that farmers comply with the requirements;
- Dealers and assembly centres with irregularities detected during the plausibility checks are neither included in the list of holdings to be selected by the GVI for on-the-spot inspections, nor subject to restriction on movements as required by Commission Regulation (EC) No. 494/98;
- No on-the-spot inspections are currently carried out in sheep, goat or pig holdings to ensure compliance with the requirements on animal identification,

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[2] ***In their response to the draft report the Polish authorities noted that ARMA has analysed the data on the assembly centres and communicated the results to the GVI. Additionally, ARMA has begun the verification of the CDB on compliance with the DVO's data on dealers and collection points.***

farm registration books and notification of movements. Moreover, no system of sanctions or movement restrictions is in force.

4.3. Establishment upgrading and approval

In response to the recommendations made in the previous FVO mission report (DG(SANCO)/7177/2004)[3] the CCA stated that all slaughterhouses had been re-evaluated in January/February 2005 (red meat) and April/May 2005 (poultry meat). The re-evaluation of cutting plants had only recently been finalised and the aim is to have all meat product establishments re-evaluated by the end of this year.

An updated CVO instruction on the procedure for approval, suspension and withdrawal of approvals (No GIWhig. 500/1/05) was issued on 2 May 2005 and this now provides clearer guidelines for the CA at various levels. The new checklists include items that were not part of lists previously in force, e.g. the management of animal by-products.

For establishments in transition the new guidelines require comprehensive veterinary checks at least 4 times a year by the DVO, using standardised reports and tables for each sector. Before the final approval, all establishments must now undergo a comprehensive evaluation by the RVO.

Observations:

- The various lists of approved establishments were not always updated and several errors were noted;
- The database established by the CCA to follow the upgrading procedure in individual establishments had, in many cases, not been updated by the DVO and thus contained many inaccuracies in relation to the production and capacities;
- The reported results of the quarterly re-evaluations for establishments in transition did not always reflect the actual situation on-the-spot;
- The DVO approval of a low capacity milk establishment did not clearly indicate the upper production limit (< 2 million litres per year) and this limit had been exceeded the previous year. The CA stated that this establishment still received 8-10% non-compliant raw milk although it has never been included in the list of establishments allowed to process EU compliant and non-compliant milk;
- One upgraded high capacity slaughterhouse (incl. cutting and meat products) and one independent coldstore had been approved for trade without ever having been in compliance with the relevant EU requirements. The FVO team considered that products from the establishments could pose a potential serious health risk to the consumers and requested written guarantees from the CCA in relation to what action would be taken;
- Coldstores had initially not been included in the upgrading procedure and could therefore have been approved by the DVO shortly after accession, without having been fully in compliance with EU requirements.

[3] A copy of the report may be downloaded from http://europa.eu.int/comm/food/fvo/index_en.htm

4.4. Food safety controls

4.4.1. Inspection tasks

The DVOs are responsible for the direct supervision of all establishments. OVs are permanently present in slaughterhouses during the whole slaughter process and on a daily basis in high capacity cutting plants. Other food processing establishments are visited regularly in accordance with CVO instruction No. 500/2/05.

Ante-mortem inspection of slaughter animals as well as post-mortem inspection of carcasses and offal (including examinations for Trichinella) were carried out by assigned, authorised private veterinarians.

Council Directive 77/96/EEC has been implemented in a MARD regulation of 31 March 2004 concerning veterinary requirements for testing meat for Trichinella and for freezing meat that has not been subjected to such testing.

Observations:

- Official records were kept of the ante-mortem and post-mortem results in all the slaughterhouses visited;
- In the wild game processing house visited the OV carried out all required checks and examinations in a satisfactory way and kept very comprehensive records of the results;
- Trichinella testing was in all cases carried out in compliance with Council Directive 77/96/EEC (method VI: The magnetic stirrer method for pooled sample digestion).

4.4.2. Meat hygiene requirements

Most establishments visited were of an acceptable, and in some cases even good, standard and complied with the EU requirements for the listed production.

However, deficiencies were identified in nearly all the establishments visited, although most of these deficiencies were minor in nature. As mentioned earlier, it was found in two cases that the establishments had been approved without fulfilling basic EU requirements.

Observations:

- Hand operated taps were present in toilets adjacent to production rooms in some of the establishments;
- One meat establishment was occasionally packing fresh meat into cartons despite having no facilities for this activity;
- In several establishments the protection of ingoing and outgoing products was considered not to be fully sufficient, e.g. due to large openings under the trucks when loading/unloading;
- Maintenance problems were seen in some establishments, mainly related to damaged floors, ceilings, wall and doors, and to rusty equipment;
- Ventilation problems resulting in condensation were seen in some chilling rooms and, in one slaughterhouse, in the slaughter hall. In one case the condensation had led to growth of mould on the ceiling;

- Rusty sharpening steels were left in sterilisation equipment in two establishment visited;
- In one low capacity milk establishment damaged insulation material was present immediately over exposed products;
- Unpacked meat was stored together with packed meat and wooden pallets in the freezing stores in one establishment;
- Protection against pests was not sufficient in all cases; some windows and doors were not fully sealed and, in one establishment, it was found that no efficient follow-up had been taken when high rodent activity had been recorded in bait stations outside the building.

4.4.3. HACCP and own check controls

Own check controls including HACCP programmes were available in all the establishments visited.

A new instruction by the CVO on the procedures for official veterinarians when supervising the implementation of Commission Decision 2001/471/EC (No GIWhig. 500/3/05) was issued 2 May 2005.

Observations:

- The weekly number of samples taken for bacteriological checks on carcasses was in some cases below the EU requirements; in other cases the sampling had only recently been initiated;
- The laboratory result for Enterobacteriaceae did not in all cases reflect the detection level (e.g. recorded as 0 CFU/cm^2) or the weekly results were presented with different detection levels (e.g. <2 CFU/cm^2; <5 CFU/cm^2, <50 CFU/cm^2) not reflecting the actual sensitivity of the laboratory test method used.

4.4.4. Health marking and traceability

Polish legislation regarding health marking requirements for fresh meat, game meat and game products, and milk and milk products was adopted during 2004 and intensified official controls have been carried out to enforce the requirements related to health marking and packaging.

The GVI is responsible for supervising the implementation of the provisions of Regulation (EC) No. 1760/2000 with regard to beef labelling, insofar as slaughterhouses, cutting plants, minced meat plants and storage are concerned. The State Sanitary Inspectorate is responsible for the retail sector.

Observations:

- Health marking of carcases was generally in compliance with the Polish requirements. However, the Polish transposition of Council Directive 64/433/EEC, Annex 1, Chapter 11, point 11 was incorrect, in requiring only 4 stamps per half carcase >65 kg;
- Beef labelling requirements for carcasses and beef quarters were complied with in the slaughterhouses visited. None of the establishments visited were packing beef in consumer packs or cartons during the FVO visit;

- In one milk establishment visited, intermediate products were packed in boxes not matching the text on the boxes. Moreover some boxes were re-labelled with a label that was easy to remove;
- Month and year of freezing was not provided on cartons with frozen meat or on the trade documents covering such products (only production dates printed on labels);
- In one cutting and meat product plant trade documents did not cover each single consignment but an entire order of meat delivered in several batches.

4.5. Animal welfare at slaughter

Council Directive 93/119/EEC was transposed into Polish legislation in September 2004. Furthermore, on 21 March 2005 the CVO issued a new instruction (No. GIWz.III.401/AW – 33/2004) concerning the procedures to be followed by DVOs and OVs on inspection of slaughterhouses in respect of animal welfare and on reporting thereof.

Stunning equipment was checked in all the slaughterhouses visited.

Observations:

- Facilities for restraining animals and spare stunning equipment (captive bolt) were available in all the establishments;
- The electrical stunning equipment had devices indicating the voltage and current and was fitted with visible indicators to mark the end of the stunning cycle.

4.6. Animal health controls

4.6.1. Eradication Programmes

Eradication programmes are in place for bovine tuberculosis, bovine brucellosis and Enzootic Bovine Leucosis (EBL). The bovine tuberculosis and brucellosis programmes are approved by Commission Decision 2004/840/EC, and, as a result, are co-financed.

Surveillance programmes are established annually at central level by the GVI and they are approved and co-financed by the MARD. Collection of blood samples for laboratory testing for EBL and bovine brucellosis, and tuberculin testing, are performed by authorised private veterinarians, working under the supervision of the DVO (on-the-spot checks with standardised reports).

The tuberculin tests are performed using the single intra-dermal test, followed by the comparative test in case of positive results.

Observations:

- The number of animals and herds found positive for bovine tuberculosis and brucellosis annually is very low in all districts (less than 0.1% and 0.2% respectively). This is compatible with the requirements laid down in Council Directive 64/432/EEC for countries or regions meeting all other requirement of the Directive to be considered officially free from bovine tuberculosis and brucellosis;

- Information concerning restriction of movements is not forwarded to ARMA in order to be introduced into the CDB. This procedure would allow the detection of irregular movement of animals in restricted herds.

4.6.2. Surveillance Programmes

Annual surveillance for CSF in domestic pigs and wild boars, swine vesicular disease and Brucella melitensis in sheep and goats is carried out in accordance with the approved surveillance programmes.

Observations:

- No positive results were detected during recent years for the above diseases. However, the target number of samples from wild boars to be tested for CSF last year was not fulfilled due to lack of samples delivered by the hunters.

4.7. Contingency Plans

4.7.1. Plan Documentation

4.7.1.1. Diseases covered

Six national contingency plans for FMD, CSF, Swine Vesicular Disease, African Swine Fever, AI and ND were prepared by the GVI in September 2003. The plans for FMD and CSF were approved by Commission Decisions 2004/435/EC and 2004/431/EC and have not been updated yet. The contingency plans for AI and ND were approved by Commission Decision 2004/402/EC and up-dated in September 2005.

Contingency plans were available at all CA levels in both electronic and CD format and also in the NRL for AI. Extracts of the contingency plans were available in the Regional and District Crisis Coordination Centres.

Observations:

- National contingency plans for FMD and CSF are still based on the old Council Directives 85/511/EEC and 80/217/EEC (Council Directive 2003/85/EC has not yet been transposed and Council Directive 2001/89/EC was transposed in October 2004). Amendments of the contingency plan for AI are not in full compliance with Council Directive 92/40/EEC.
- Neither full district plans nor extracts of these were forwarded to the private practitioners.

4.7.1.2. Content of plans

Contingency plans for CSF, FMD, AI and ND are based on the national template and composed of three sections, covering general information, the manual of operations and the annexes with contact lists of persons and institutions involved in outbreak at regional and district level.

Observations:

- The manuals of operation were not updated with regard to local information (number and structure of farms, distances, environment) and resources available;
- The description of culling methods in district plans was too general and did not reflect equipment actually stored at the DVO or provided by private practitioners;
- Operation of disinfection points and documentation needed was not described in operational manuals in the regions and districts. Specific instructions for the documentation of cleaning and disinfection procedures applied to vehicles and containers used for transport during an outbreak were not available;
- Lists of approved disinfectants and the concentrations to be used for disinfection during outbreaks were available in the contingency plans, but the plans did not include any list of suppliers of disinfectants and other equipment and materials to be used.

4.7.2. Legal provisions and emergency powers

The *Veterinary Act* and *Act on Natural Disasters and Emergency Situations* provide a legal background for emergency actions. The chain of command is also described in the contingency plans, including tasks of the veterinary services at different levels and coordination with other institutions.

Observations:

- There was no clear description of the coordinated action and reporting procedure that should be taken by the Local Disease Coordination Centre at district and region level for different scales of outbreak including multiple outbreaks.

4.7.3. Organisation (suspicion and following confirmation of disease)

If an outbreak is suspected, the DVO is in charge of taking the appropriate samples for examination in the NRL and for carrying out an epidemiological survey. The epidemiological questionnaires were available at the DVOs visited.

Once an outbreak is confirmed the CVO, RVO or DVO becomes Deputy of the Crisis Coordination Centre that is involved in the eradication of the outbreak. Killing of animals on-farms is considered as a first option for outbreaks in large animals, followed by their direct transfer to a rendering plant. A pre-agreement has been signed between the GVI and a private company for culling of poultry.

Formal arrangements with the rendering industry have been signed between the RVO and the rendering plants. According to the CCA, the current rendering capacity of 1,300,000 tons per year (260,000 tons for processing of Category I material) is considered to be sufficient to cope with minor outbreaks not covering the whole country.

Observations:

- Tools used to identify the place of the outbreak and protection zones were insufficient. Geographic Information Systems were not available in the

veterinary offices visited and the number of holdings was too large to be identified on the most detailed maps that were available;

- A list of rendering plants throughout the country was included in the operational manual, but this was not always up-dated and details of their capacity and practical arrangements for disposal were not described in the districts' contingency plans;
- Alternative scenarios for disposal of animals and infected materials were not developed and remote areas have neither been identified nor approved in accordance with Article 24 of Regulation (EC) No. 1774/2002 in the regions visited.

4.7.4. Provision of resources

Expenditure relating to the eradication of disease outbreaks and compensation equivalent to the animals' market value will be financed from the state annual budget (financial reserve of MARD). No separate funds are available. Special arrangements would be made with the Ministry of Finance to ensure that the necessary finance will be released following spreading of disease. A meeting was held on 15 September 2005 at the National Crisis Coordination Centre in connection with financial issues in case of an AI outbreak in 2005.

Necessary storage for dealing with an initial outbreak is arranged and financed by the DVO and equipment for sampling, transport media and transport containers that must be kept at each DVO is specified in the contingency plans. In the event of a disease spreading, regional Governments and the Ministry of Economy will be in charge of material resources.

Observations:

- The CCA stated that compensation would be paid within 60 days of an outbreak although this was not established in national legislation;
- No contracts were established with operators selling or renting equipment to ensure a quick supply in case of an emergency situation at regional and district level;
- The unified list of all items that should be kept was not issued by the GVI or the RVO. Equipment and material stored for clinical examination and killing of suspect animals, and disinfection, was generally incomplete and improperly maintained;
- Sampling kits and boxes for transport of samples were available in all offices visited. However, not all necessary items were available for sampling for virology (mouth openers, probang test, transportation media). There was specific sampling equipment provided for poultry;
- There was no evidence of controls carried out by the RVO level over equipment stored at DVO level;
- The DVO reported a lack of veterinary staff in the districts visited. There are no special provisions in the contingency plans dealing with human resources outside the veterinary services (e.g. accommodation facilities for people involved in outbreak, contracts with butchers contracted for stand-by regime, involvement of private practitioners).

4.7.4.1. Laboratories

There are NRLs for FMD, CSF, ND and AI. A total of 16 regional laboratories carry out serological testing under the national monitoring programme and currently three of these are capable of performing serology tests for AI.

Observations:

- All the laboratories were integrated into the contingency plan preparation and staff participate in the National Crisis Team. The laboratories participate regularly in ring-tests organised by the relevant Community Reference Laboratory;
- Current weekly testing capacities for AI are 25 samples for virology with possibility to identify subtypes of AI virus and 500 samples for serology. In case of an emergency the capacity would be doubled to 50 samples and 1000 samples respectively. An agreement has been signed with a German laboratory to carry out testing in the event of a serious AI outbreak throughout the country;
- In the framework of implementation of survey programmes for AI in poultry and wild birds in the Member States (Commission Decision 2005/464/EC as amended), 5,000 samples have so far been tested out of 12,000 samples foreseen for the period August 2005 – January 2006.

4.7.4.2. Animal tracing – pre and post outbreak

The possibilities for effective animal tracing pre and post outbreak are very limited at present. Although CDBs for cattle, sheep, goat, pig and poultry holdings are in place, the traceability system is still based mainly on records and farm registers. No movement document is required for national movements of animals.

Observations:

- The CDBs do not provide data for localisation of outbreaks and evaluation of the density of animals in outbreak and protection zones (introduction of coordinates started recently in July 2005 and only for cattle)[4];
- Not all sheep, goat, pig and poultry holdings are registered in the CDBs and significant delays exist in updating the databases. The two poultry farms visited were registered and under veterinary supervision;
- ARMA provides its district branches with weekly up-dated lists of cattle holdings, but the lists presented at the DVO visited were not up-dated and no lists were provided for sheep, goat and pig holdings. Lists of poultry farms were available at the DVO visited.

[4] ***In their response to the draft report the Polish authorities noted that ARMA carries out work to introduce the function of searching the numbers of the holdings and identification numbers of animals within the given radius and the difference between the radiuses in order to identify holdings and animals located around the outbreak.***

4.7.5. Provisions for emergency vaccination

The contingency plans for mammalian diseases only include the possibility of emergency vaccination after informing the EC or after getting its approval. The plans only describe basic criteria for emergency vaccination and there are no vaccines in store at the moment.

Observations:

- Little evidence of planning for the introduction of emergency vaccination was found in regional and district plans;
- The contingency plan for AI does not provide details of the estimated quantity of AI vaccine required in the event of the reinstatement of an emergency vaccination strategy.

4.7.6. Training and awareness of programmes, simulation

Contingency plans are kept only for internal use by the veterinary service and they have not been made available to the public. The awareness campaign for AI organised by GVI was started recently and information leaflets have been distributed.

There are clear and detailed provisions incorporated in contingency plans concerning training, but they are not followed for FMD and CSF. Some training for AI was recently provided for the veterinary services and the industry.

Some simulation exercises have been organised at national and regional level. National simulation exercises have been organized by TAIEX in 2002 for FMD and in 2003 for ND. An AI simulation exercise planned for December 2004 did not take place due to lack of funds. The CCA stated that an AI simulation exercise will now take place in November 2005 in collaboration with USA.

The Regional Crisis Coordination Centres organise quarterly simulation exercises for various crisis situations where the veterinary services are involved.

Observations:

- The GVI has not established any central training programme for contingency plans and the training activities carried out at regional and district level were not coordinated in regard to frequency and topics covered. No training or simulation exercises have been performed at national level for CSF and a regional exercise was only organised in one of the four regions visited;
- No training has been provided by the NRL or RVO to officials from DVO responsible for the sampling and despatch of samples for FMD and CSF;
- Regular practical training for private veterinarians is not provided under the contingency plans except for ad hoc training during an alert situation (recently for AI);
- Since the last outbreak of FMD no direct training had been given to farmers regarding the risk of FMD and CSF in the districts visited. The information provided for AI was quite basic and concerned mainly the measures to be followed in order to prevent the introduction of AI;

- The recommendations from an FMD simulation exercise organised in 2002 with participation of veterinary experts from Denmark to carry out annual training sessions and to conduct simulation exercises in border areas had not been addressed and implemented.

4.8. Miscellaneous

During the visit to the coldstore mentioned in point 3.3, the FVO team found the following evidence that old cartons had been used for repacking imported fish:

– Empty cartons from an Icelandic fishing vessel neatly stored in a locked room;

– Similar cartons containing frozen fish stored in one storage freezer with additional labels (fish from Argentina);

– Empty carton in waste bin with a label matching the information on the additional label of the repacked products (production date, expiry date, origin Argentina).

The FVO team requested the CCA to provide in writing the result of their investigation into this case.

In response to one of the recommendations made in the previous FVO mission report (DG(SANCO)/7177/2004) the CCA provided the following guarantees in relating to the food processing establishment in the south of Poland where imported powdered milk products not meeting Community requirements had been processed, re-packed and exported as product of Polish origin fit for human consumption:

– The establishment has now been separated into two completely segregated and independent establishments (non-animal products / dried milk products) under the same ownership;

– The activities in question are no longer performed as the dried milk processing has temporarily been ceased. Both establishments are at present under intensified supervision from the State Sanitary Inspectorate;

– The dried milk product establishment is in the process of being completely up-graded and is expected to start operation in December 2005 after GVI approval and under DVO inspection.

The FVO team requested the CCA to provide written updates on the progress made in relation to the approval and supervision of this establishment[5].

5. CLOSING MEETING

A closing meeting was held on 28 October 2004 with the CCA, General Veterinary Inspectorate. At this meeting, the main findings and preliminary conclusions of the mission were presented by the inspection team. The representatives of the CCA took note of these and expressed their willingness to correct the shortcomings observed.

The CCA provided written guarantees that action had already been taken in relation to the two establishments where serious shortcomings had been identified:

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[5] The written guarantees were later provided in a letter from the Deputy CVO on 9 November 2005.

- The slaughterhouse had been ordered to cease slaughter, cutting and processing until basic requirements are fulfilled. It will then be allowed to operate for a limited time and for the local market only until all required upgrading has taken place, or face downgrading to low capacity;
- The coldstore had been ordered to eliminate all the deficiencies recorded and part of its approval had been withdrawn (re-classified for the domestic market only).

The FVO team indicated at the meeting that the action taken or planned by the CA in relation to the coldstore was considered not to be sufficient and that information on further action was expected[6].

During the final meeting the RVO involved provided written evidence of the action taken in relation to the two dealers and one assembly centre referred to in point 3.2.1 of this report.

6. CONCLUSIONS

6.1. Competent authority performance

Minimum requirements for the veterinary supervision by various CA levels in all types of establishments have been laid down in a new CVO instruction issued in May this year. However, CA inspections from higher levels in establishments did generally not include a proper supervision of the work carried out by the lower CA level.

6.2. Holding registration, animal identification and movement controls

Animal identification was generally considered to be satisfactory. However, the holding registration and movement controls were not considered to be fully satisfactory due to shortcomings noted in the databases, delayed notifications inadequate on-the spot inspections of holdings, the system in place for sanctions and penalties, and the system in force for approval and supervision of assembly centres and dealers (Council Regulations (EC)/1760/2000 and 21/2004, Commission Regulations (EC)/1082/83 and 498/98 and Council Directive 64/432/EEC)[7].

6.3. Establishment upgrading and approval

Most meat establishments will by the end of this year have been re-evaluated by the CA in response to an earlier FVO recommendation.

The procedures to be followed for approval, suspension and withdrawal of approvals were updated in May this year and now provide clearer guidelines for the various CA levels. The updated guidelines require that establishments in transition

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[6] ***In their response to the draft report the Polish Authorities noted that the establishment's approval for trade was withdrawn by an RVO decision of 27 December 2005 and that until the deficiencies are eliminated it is reclassified for the domestic market.***

[7] ***In their response to the draft report the Polish Authorities noted that the presently binding provisions on the system of identification and registration of animals have not provided ARMA with the necessary tools for imposing sanctions on the operators in the case of late notifications.***

must undergo successfully comprehensive evaluations by both DVO and RVO levels before approval is granted.

Despite the re-evaluation and the improved procedures, several shortcomings were identified in relation to approval of establishments, the updating of official lists of approved establishment and the database used by the CCA to follow the upgrading procedure in individual establishments.

One high capacity slaughterhouse and one coldstore visited had been approved by the DVO despite never having been in compliance with the relevant EU requirements.

6.4. Food safety controls

No major deficiencies were found in relation to the inspection tasks in the food establishments visited. However, minor deficiencies relating to meat hygiene requirement were identified in most establishments, and in the two cases where establishments had been approved without fulfilling basic requirement, the deficiencies were considered to be serious and leading to a potential health risk to the consumers.

Although new guidelines on bacteriological checks on carcasses in accordance with Commission Decision 2001/471/EC recently had been issued, deficiencies in the implementation of the checks could still be found in some of the slaughter establishments visited.

Shortcomings were also identified in relation to the health marking of carcasses, compulsory labelling of frozen products and trade documents. The health marking requirements for carcasses in Council Directive 64/433/EEC had been incorrectly transposed into Polish legislation.

6.5. Animal welfare at slaughter

The CA inspections procedures in respect of animal welfare requirements at slaughter have recently been tightened up. No deficiencies were observed by the FVO team in the slaughterhouses visited.

6.6. Animal health controls

Controls on eradication and surveillance of animal diseases were considered generally satisfactory.

6.7. Contingency Plans

The contingency plan for FMD has not been updated to comply with the requirements laid down in Council Directive 2003/85/EC. The implementation of contingency plans in general was considered unsatisfactory due to a number of shortcomings; in particular the lack of regular training, simulation exercises or awareness campaigns and a failure to adapt plans to local conditions, as required in Council Directives 2001/89/EC and 2003/85/EC.

There is a shortage of equipment in the Local Disease Control Centres and an absence of written contracts with suppliers guaranteeing the availability of this equipment in case of emergency.

6.8. Miscellaneous

The FVO team found evidence that repacking of imported fish into old cartons had taken place in a coldstore visited.

Additional information and guarantees were provided in relation to a milk plant where illegal activities had been discovered during the previous FVO mission in 2004.

7. RECOMMENDATIONS TO THE COMPETENT AUTHORITIES OF POLAND

(1) To ensure that periodic establishment inspections from RVO and DVO also include proper supervision of the work carried out by lower level CA.

(2) To improve the monitoring of the databases for cattle, sheep/goats and pigs ensuring that the system established gives guarantees that events are notified within the timeframe required by the legislation in force.

(3) To ensure that identification controls in bovine holdings are carried out in accordance with the requirements of Commission Regulation No. (EC) 1082/2003 and Commission Regulation No. (EC) 494/98.

(4) To re-evaluate coldstores in order to ensure that only establishments complying with the relevant EU requirements are approved and that appropriate action is taken with regard to non-compliant establishments.

(5) To correct the shortcomings noted in meat hygiene practices.

(6) To amend the incorrect transposition of Council Directive 64/433/EEC in regard to health marking requirements for carcasses.

(7) To urgently finalise the transposition of Council Directive 2003/85/EC.

(8) To ensure that approval and supervision of all assembly centres and dealers is guaranteed and performed in accordance with the provisions of Council Directives 64/432/EEC and 91/68/EEC.

(9) To update the contingency plans for FMD and CSF in order to ensure full compliance with Council Directives 2003/85/EC and 2001/89/EC.

(10) To adapt the contingency plans, in particular FMD and CSF, to the local conditions of regions and districts as required by Council Directives 2003/85/EC and 2001/89/EC, and to correct the deficiencies detected.

(11) To ensure that equipment stored at DVO and system in place for supply of additional equipment can guarantee its full availability for detection of outbreak and eradication of disease, as required by Council Directives 2003/85/EC and 2001/89/EC.

(12) To ensure the accurate and prompt updating of CDB and incorporate system tools required for full traceability of animals in case of a disease outbreak.

(13) To ensure that training, simulation exercises and awareness in relation to contingency plans, in particular FMD and CSF, is carried out regularly as required by Council Directives 2001/89/EC and 2003/85/EC.

ADDENDUM

Response of the Polish Authorities to the draft mission report

The Polish Authorities commented on the draft report by means of a letter dated 30 January 2006. Where appropriate these comments have been incorporated into the final report. They also provided an initial reaction to certain conclusions and recommendations in the report, in particular by providing details of action already taken or to be taken to correct deficiencies noted.

ANNEX – LEGAL REFERENCES

COMMUNITY LEGISLATION CITED IN THIS REPORT

Legal acts cited in this annex refer, where applicable, to the last amended version.

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 77/96/EEC	L 026, 31.01.1977, p. 67	Council Directive 77/96/EEC of 21 December 1976 on the examination for trichinae (Trichinella spiralis) upon importation from third countries of fresh meat derived from domestic swine
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 77/391/EEC	L 145, 13.06.1977, p. 85	Council Directive 77/391/EEC of 17 May 1977 introducing Community measures for the eradication of brucellosis, tuberculosis and leucosis in cattle
Council Directive 91/494/EEC	L 268, 24.09.1991, p. 35	Council Directive 91/494/EEC on animal health conditions governing intra-Community trade in and imports from third countries of fresh poultry meat
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 92/40/EEC	L 167, 22.06.1992, p. 1	Council Directive 92/40/EEC introducing Community measures for the control of avian influenza
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 92/66/EEC	L 260, 05.09.1992, p. 1	Council Directive 92/66/EEC introducing Community measures for the control of Newcastle disease
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
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
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

European legislation	OJ	Title
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 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
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
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 Decision 2001/471/EC	L 165, 21.06.2001, p. 48	Commission Decision 2001/471/EC 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
Commission Decision 2004/402/EC	L 123, 27.04.2004, p. 111	Commission Decision 2004/402/EC of 26 April 2004 approving contingency plans for the control of avian influenza and Newcastle disease
Commission Decision 2004/431/EC	L 189, 27.05.2004, p. 31	Commission Decision 2004/431/EC of 29 April 2004 approving certain contingency plans for the control of classical swine fever
Commission Decision 2004/435/EC	L 189, 27.05.2004, p.45	Commission Decision 2004/435/EC of 29 April 2004 approving certain contingency plans for the control of foot-and-mouth disease
Commission Decision 2004/840/EC	L 361, 08.12.2004, p. 41	Commission Decision 2004/840/EC of 30 November 2004 approving programmes for the eradication and monitoring of certain animal diseases and of checks aimed at the prevention of zoonoses presented by the Member States for the year 2005 and fixing the level of the Community's financial contribution
Commission Decision 2005/464/EC	L 164, 24.06.2005, p. 52	Commission Decision 2005/464/EC of 21 June 2005 on the implementation of survey programmes for avian influenza in poultry and wild birds to be carried out in the Member States