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**EXTRACT FROM A REPORT ON A FOOD AND VETERINARY OFFICE MISSION CONDUCTED IN  
BELGIUM  
23 JUNE - 4 JULY 2008**

**WITH THE AIM OF ASSESSING**

**THE APPLICATION OF THE ANIMAL HEALTH CONDITIONS GOVERNING INTRA-COMMUNITY  
TRADE IN LIVE ANIMALS AND THE OPERATION OF THE IDENTIFICATION SYSTEM FOR SHEEP  
AND GOATS**

*NB The text below is a summary translation of part of the original mission report (Ref. DG(SANCO)2008-7945). It is intended for use by visitors to this site, but has no official validity. It is advisable to refer to the full text of the original mission report.*

**1. Legislation**

The lack of a clear legal basis for compulsory immediate notification by all keepers of equidae in the event of suspicion or confirmation of any of the diseases listed in Annex A of Directive 90/426/EEC where there are no symptoms or lesions constitutes a theoretical defect in the notification mechanism.

**2. Competent authorities**

The designation, organisation and operational criteria of the competent authorities within the scope of the mission are a general response to the requirements of Regulation (EC) No 882/2004, and several measures are being taken to improve still further the compliance with these criteria.

The lack of clarity in the designation of the authorities responsible for equidae has implications for official checks on the identification, rearing conditions and monitoring of such animals up to the time of slaughter or certification.

### **3. Animal identification, holding registration**

Cattle, sheep, goat and pig holdings are registered and the animals are correctly identified in general. The lack of registration of inspection posts (staging points) and the inadequate identification of pigs passing through assembly centres are minor defects in this context. Official inspections are conducted and documented in this field.

### **4. Movement control**

The overall shortcomings observed in the traceability of cattle are likely to undermine the efficiency of the surveillance network system.

Defects were noted both in the transposition of Community requirements (notification of the date of arrival in the database and passports; notification on the passports of the last keeper even if a dealer or head of an assembly centre; dealer's holding register) and in the application of the requirements once transposed (notification of animals passing through dealers' premises, keeping of compliant records distinguishing between the holding itself and the dealers' premises).

These defects are of particular concern where they relate to dealers with premises; however, the database records of animals passing through assembly centres also indicate a deficient database management which raises doubts as to whether the base is kept fully operational, given the lack of a search function, whether automatic or menu-driven, for input errors and their correction.

The recent Community traceability requirements for sheep and goats have been implemented, but only partially applied. Operators do not regularly use all of the documents necessary for traceability, and local competent authorities do not enforce their use.

Despite the national database, the traceability of equidae is inadequate at present, given the failure to notify changes of owners or keepers in passports.

### **5. Health status**

Safeguarding of the health status of the national cattle stock in terms of tuberculosis, leucosis and brucellosis is excellent, thanks to an outstanding surveillance system. Regular inspections of pig holdings help to ensure that holdings qualify. Some provisions of the surveillance network system linked to the conditions governing approved veterinarians have not yet been applied, and the fields for health information able to be entered in the database are too restrictive.

### **6. Assembly centres and dealers**

The confusion between assembly centres and dealers' premises is generalised at all levels of the competent authorities. This confusion is astonishing, since it was pointed out in an internal audit report as early as 2005. Approvals were inadequately documented; the lack of

generalised use of a clear standard format covering the correct legal bases exacerbates this confusion.

Wide variations in the observance of the structural standards were noted during the mission, and record-keeping was sporadic to the point of being unacceptable in most cases. Two of the assembly centres visited failed to meet the approval conditions, and the assembly-centre conditions for pigs were unacceptable. The official inspections of these operators were insufficient to enforce the application of all the standards in force.

## **7. Transporters**

The means of documenting the cleaning and disinfection of vehicles are in place, but the implementation of these operations and their inspection by the competent authorities are inadequate. It is difficult to check whether the disinfectants used are approved.

## **8. Inspection posts**

The inspection post visited met the conditions for operation approval, but the competent authority's management of the approval of these posts was unsatisfactory.

## **9. Checks at origin**

### **9.1 General procedure**

Checking prior to certification of cattle is facilitated by the lack of a requirement for tests prior to dispatch for bluetongue-free areas.

Despite certain guidelines, the lack of a clear division of responsibilities for checks prior to certification and the absence of established checking or information-seeking protocols for certain points mean that some of the points certified have not been checked or have been checked incorrectly, which may result in the non-application of the required additional conditions or guarantees.

The lack of training for inspecting veterinarians on the certification principles, particularly on the application of point 3.2 of the Council Directive prohibiting the certification of points which cannot be checked or of which they have no personal knowledge, and thus on the means of complying with all certification points, precludes reliable certification, since such veterinarians do not receive supervision covering all aspects of their inspections.

The checks carried out for equidae certification were inadequate, and the elements available to the certifying veterinarian were insufficient to ensure that point 5 of the certificate was completed (requirements of Article 4(2) of Directive 90/426/EEC). The largely inadequate traceability of animals is both a certification problem and a risk in the event of an outbreak of an infectious disease.

### **9.2 Procedure at assembly centres and dealers' premises**

The cattle certification procedure on dealers' premises contravenes both Community and national legislation. It also poses an immediate problem for all cattle, given the loss of

traceability of such animals once they have left their holding of origin. The traceability of animals on dealers' premises is a general problem for certification reliability.

#### **10. Inspections during transit**

Certification during the transit of cattle from one Member State to another when consignments of animals are reconstituted met the traceability and information follow-up requirements. There was no provision at the inspection post for protection against attacks by the bluetongue vector on animals in transit between areas not subject to restrictions.

#### **11. Checks on arrival at destination**

Some tuberculosis checks at the destination have for several years discriminated against certain Member States, and do not therefore comply with Article 5(1) of Directive 90/425/EEC.

### **Recommendations**

1. Discontinue the certification at cattle dealers' premises, which does not comply with Article 5(2) of Directive 64/432/EEC.
2. Revise the conditions for certifying cattle so as to certify only at authorised assembly centres or holdings of origin, in accordance with Article 5(2) of Directive 64/432/EEC –Revise the assembly centre procedures to ensure that all cattle and pigs accepted have the same health status, in accordance with Article 11(1)(a) of Directive 64/432/EEC; Allow only animals accompanied by an official document containing all the necessary information, and concerning the holding of origin, to be certified at assembly centres in accordance with Article 5(2)(b) of Directive 64/432/EEC.
3. Revise the approvals of assembly centres and dealers' premises to ensure that they are properly granted under the relevant legislation and meet the conditions of Articles 11 and 13 of Directive 64/432/EEC or Articles 8a and 8b of Directive 91/68/EEC. Transmit the list of duly approved assembly centres to the Commission in accordance with Commission Decision 2007/468/EC; Similarly revise the approvals of inspection posts (staging points) and send to the Commission the updated lists of approved points in accordance with Article 3(1) of Regulation (EC) No 1255/97.

4. Revise the requirements and apply and inspect correctly all standards for the notification and monitoring of cattle movements for all keepers (in passports, registers and the database), in accordance with the relevant provisions of Article 14C of Directive 64/432/EEC (particularly point 1, 7<sup>th</sup> indent, and Article 7(3) of Regulation (EC) No 1760/2000 and Chapter II of Regulation (EC) No 911/2004, Articles 6 and 8); apply the same to inspections of sheep and goat movements (systematic use of the circulation documents described, complete records containing all data in Annex B.1 of Regulation (EC) No 21/2004); ensure that the data field for health information enables restrictions on movements and other relevant information to be entered in accordance with point D.1 of the annex to Regulation (EC) No 21/2004 and Article 1(1)(e) of Decision 2000/678/EC.
5. Ensure that the regular inspections of dealers under Article 13(4) of Directive 64/432/EEC or Article 8b(4) of Directive 91/68/EC guarantee that activities as dealers are clearly separated from activities as production or rearing holdings.
6. Revise the identification of pigs at the assembly centre so as to register them in such a way that the original or transit holding, centre or organisation can be traced, in accordance with Article 3(1)© of Directive 90/425/EEC.
7. Ensure that the certification of equidae is also based on the declarations of the owner or keeper, under Article 4(2) of Directive 90/426/EEC, whose name is mentioned in the passport in accordance with requirement II.1 of the annex to Decision 93/623/EEC, and whose holding is registered in accordance with Article 6(2) of Regulation (EC) No 852/2004, where equidae are not excluded from the food chain.
8. Ensure that, in accordance with Article 6 of Directive 90/426/EEC, derogations from inspections prior to intra-Community trade in equidae granted to other Member States are notified to the Commission.
9. Revise the certification procedures to ensure that all certification points are checked and documented. Revise the conditions for the training and supervision of certifying veterinarians so as to ensure that they understand the implications of Directive 96/93/EC.
10. Revise the procedures for issuing certificates, notification in TRACES and certificate checking so as to guarantee the correct and complete communication of the certified data, the date of issue of the certificate and the information to the Member State of destination, in accordance with Article 4(2) of Directive 90/425/EEC.
11. Revise and check the procedures for entering Part III of certificates in Traces where a check is undertaken, in accordance with Article 3(2)(a) of Decision 2004/292/EC.
12. Revise the regulations to ensure compulsory immediate notification of all diseases listed in Annex A of Directive 90/426/EEC.
13. Draw up, apply and check the standards of protection against attacks by the bluetongue vector at inspection posts, in accordance with Article 9(1)(c) of Regulation (EC) No 1266/2007.

14. Revise the protocols for inspecting the use of disinfectants so as to ensure that only disinfectants authorised by the competent authority are used for disinfecting means of animal transport and in places approved by the competent authority, in accordance with Article 12 of Directive 64/432/EEC, Article 8c of Directive 91/68/EEC and Article 7 of Directive 90/426/EEC. Ensure that all authorised disinfectants are labelled with an expiry date relevant to normal conditions of storage, in accordance with Article 20(3)(i) of Directive 98/8/EC.