



EUROPEAN COMMISSION  
HEALTH AND CONSUMERS DIRECTORATE-GENERAL  
Directorate F - Food and Veterinary Office

DG(SANCO) 2009-8258 - MR FINAL

FINAL REPORT OF A MISSION  
CARRIED OUT IN  
ITALY  
FROM 03 TO 12 JUNE 2009  
IN ORDER TO EVALUATE THE IMPLEMENTATION OF THE BRUCELLOSIS  
ERADICATION PROGRAMME IN CATTLE AND BUFFALO

### *Executive Summary*

The report describes the outcome of a mission carried out by the Food and Veterinary Office of the European Commission Italy from 3 to 12 June 2009. The mission team comprised two inspectors from the Food and Veterinary Office (FVO) and one observer from another Commission service. The mission was undertaken as part of the FVO's planned mission programme.

The legal basis of the mission was Article 45 of Regulation (EC) No 882/2004. The objective of the mission was to evaluate the implementation of the approved eradication programme of bovine brucellosis.

Brucellosis in buffalo and cattle has been a problem for many years in several regions of Italy. The Commission has approved the national eradication programme, including a special eradication programme for buffalo brucellosis in the province of Caserta, the area in the Campania region with the highest concentration of buffalo herds and the highest incidence of the disease.

Significant progress has been made in Italy regarding the control and eradication of brucellosis in cattle and buffalo and, as a consequence, the incidence of newly infected herds found in the most affected regions so far in 2009 has fallen dramatically in comparison with 2007 and 2008. However, the mission revealed a number of weaknesses in the official control system related to this eradication programme which are likely to jeopardise or slow down its progress if not corrected. This included in particular weaknesses in the field of identification of animals and registration of holdings, farm biosecurity and food safety checks.

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

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#### ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

<b>Abbreviation</b>	<b>Explanation</b>
ASL	Local Competent Authority ( <i>Azienda Sanitaria Locale</i> )
CA	Competent Authority
CCA	Central Competent Authority
FVO	Food and Veterinary Office
HACCP	Hazard Analysis & Critical Control Points
ICT	Intra Community Trade
IZS	Istituto Zooprofilattico
OV	Official Veterinarian
RCA	Regional Competent Authority
SANCO	Health and Consumer Directorate General of the European Commission

## 1 INTRODUCTION

The mission took place in Italy from 3 to 12 June 2009. The mission team comprised two inspectors from the Food and Veterinary Office (FVO) and an observer from another Commission service. The mission was undertaken as part of the FVO's planned mission programme.

## 2 OBJECTIVES OF THE MISSION

The main objective of the present mission was to evaluate the measures in place to control the disease and, in particular, to follow up on the previous mission on this subject which took place in 2004.

The objectives of the mission were to review and evaluate the measures taken by the Italian competent authorities (CA) in relation to the brucellosis eradication programme in cattle and buffalo.

In particular, attention was paid to:

- Elaboration, implementation and control of the eradication plan;
- Action taken by the CAs to detect and control outbreaks;
- Measures taken to prevent the spread of the disease.

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

Competent authority visits			Comments
Competent Authority	central	2	Opening and closing meeting
	regional	2	
	district	5	
<b>Other sites visited</b>			
Buffalo holdings		4	
Cattle holdings		2	
Slaughterhouses		2	
Dairy establishments		2	
Laboratory		1	

Throughout the mission, the mission team was accompanied by representatives of the Central Competent Authority (CCA).

### 3 LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation and, in particular Article 45 of Regulation (EC) No 882/2004 of the European Parliament and the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

References to the last amended versions of Community legislation relevant to this mission are set out in Annex I to this report.

### 4 BACKGROUND

#### 4.1 APPROVAL OF THE ERADICATION PROGRAMMES

By Commission Decisions 2007/782/EC and 2008/897/EC, the Commission approved the Italian national brucellosis eradication programmes for 2008 and 2009 respectively, including the special eradication programme for buffalo brucellosis in Campania. Details of the Commission approved programmes can be found at:

[http:// ec.europa.eu/food/animal/diseases/eradication/index\\_en.htm](http://ec.europa.eu/food/animal/diseases/eradication/index_en.htm)

#### 4.2 PREVIOUS FVO MISSIONS ON BRUCELLOSIS

The last mission to Italy with regard to cattle and buffalo brucellosis was carried out in March - April 2004 (ref. DG(SANCO)/7130/2004). The report is available on the Health and Consumer Protection Directorate General internet site at:

[http:// ec.europa.eu/food/fvo/rep\\_details\\_en.cfm?rep\\_id=1184](http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=1184)

#### 4.3 DISEASE SITUATION

Brucellosis in buffalo and cattle has been a problem for many years in several regions of Italy.

##### 4.3.1. Buffaloes

Table 1: Buffalo holdings in Campania

Number of holdings	Number of holdings in the brucellosis programme	Number of holdings checked	Number of holdings found positive	Number of new holdings found to be positive
2127	2014	1990	409	128

Table 2: Buffaloes in Campania

Number of buffaloes	Number of buffaloes in the brucellosis programme	Number of buffaloes checked	Number of buffaloes found positive
256 740	222 426	221 552	18 290

The above mentioned figures indicate a prevalence of almost 30% for the Campania holdings with over 9% incidence.

#### 4.3.2. Cattle

Table 3: Brucellosis in Cattle in 2008

Regions that checked for brucellosis*	Number of holdings	Number of holdings in the brucellosis programme	Number of holdings checked	Number of holdings found positive	Number of new holdings found to be positive
Abruzzo	3333	2373	2369	7	6
Basilicata	3473	3164	3009	97	47
Calabria	7573	6455	6455	377	201
Campania	13239	10408	10147	113	85
Lazio	11433	6671	6660	7	4
Liguria	1090	794	794	0	0
Marche	5073	1976	1976	0	0
Molise	3111	2518	2518	13	10
Piemonte	6666	4904	4904	0	0
Puglia	4372	4230	4230	84	57
Sicilia	11094	10610	10567	647	495

Valle d'Aosta	1379	1351	1253	4	3
<b>Total</b>	<b>71836</b>	<b>55454</b>	<b>54882</b>	<b>1349</b>	<b>908</b>

\* Regions officially free of bovine brucellosis: Bolzano, Emilia-Romagna, Friuli-Venezia Giulia, Lombardia, Sardegna, Toscana, Trentino-Alto Adige, Umbria, Veneto

From this table it appears that Calabria and Sicily have the highest prevalence of bovine brucellosis in holdings (about 6% in both regions) and an incidence of 3.1% in Calabria and of 4.7% in Sicily.

## 5 FINDINGS AND CONCLUSIONS

### 5.1 HOLDING REGISTRATION, ANIMAL IDENTIFICATION AND MOVEMENT CONTROL

#### 5.1.1 *Legal basis*

Council Regulation (EC) No 1760/2000 lays down the requirements for cattle identification, the computerised database, cattle passports and holding registers and its Article 2 defines a holding as any establishment, construction or, in the case of an open air holding, any place where animals are held, kept or handled.

Article 2 of Council Directive 64/432/EEC defines a herd as an animal or group of animals kept on a holding as an epidemiological unit and, if more than one herd is kept on a holding, each of these herds shall form a distinct unit and shall have the same health status.

Commission Regulation (EC) No 911/2004 of 29 April 2004 implementing Regulation (EC) No 1760/2000 lays down additional requirements as regards ear tags, passports and holding registers.

Point 4 (b) of Article 2 of Commission Regulation (EC) No 1082/2003 requires the CA to select the holdings to be checked on the basis of a risk analysis which shall take into account public and animal health considerations, and in particular the existence of previous outbreaks of animal disease.

#### 5.1.2 *Findings*

The main aspects of the system in place for holding registration, animal identification and movement controls have been described in former FVO reports ( references: SANCO 2008-7801, SANCO 2007-7368, SANCO 2006-8207, SANCO 2006-8204, SANCO 2006-8184, SANCO 2006-8171, SANCO 2004-7130).

The mission team noted that

- In one region, 180 herds that perform transhumance had never been covered in the census before 2008. The CA explained that before that date, as these herds had no health qualification, animals could not move out as movement is only possible if animals are registered.

- Not all cattle and buffaloes seen during the mission were properly identified and registered. In one holding, 5 out of 15 young animals over 3 months of age had neither received their ear tag nor their bolus.
- In all holdings visited, registers were available and kept up to date.
- Information on holdings was often found not to be updated in the database.
- An assembly centre that was said by the CA to be no longer operational, was nevertheless registered in the database as still having animals from the previous two years. The CA stated that the collection centre had been recently visited and found empty.
- In one holding, 20 animals of a dairy cattle herd that was kept indoors had been reported as stolen after the visit, for blood sampling for brucellosis tests, by the official veterinarian (OV) who noticed that cattle were missing. Two months later, on the day of the OV visit, 15 more animals were reported as stolen. The OV did not comment on this.
- A lack of recording of illegal movement of animals in the Italian national database, i.e. animals that had been reported as stolen to the police, were still indicated in the database as present in the holding.
- A buffalo slaughtered in March 2008 because of brucellosis was still indicated in the database as being alive until 28 May 2008.

### *5.1.3 Conclusions*

In spite of holding registration and animal identification not always being completely adequate, animal identification, movement records and on-holding registers can be considered satisfactory in general. However, the database is not updated properly.

The system is undermined by a high number of animals being reported as stolen. If this is indeed the case, frequent uncontrolled animal movement may take place without knowledge of the CA.

## **5.2 IMPLEMENTATION OF THE BOVINE BRUCELLOSIS ERADICATION PROGRAMME**

Commission Decision 2008/341/EC of 25 April 2008 lays down Community criteria for national programmes for the eradication, control and monitoring of certain animal diseases and zoonoses

### *5.2.1 Classification of herds*

#### *5.2.1.1 Legal basis*

Chapters II of Annex A to Council Directive 64/432/EEC lays down the provisions for determining the health status with regards to intra-community trade, and Article 2 of Council Directive 78/52/EEC defines the different brucellosis status of the herds:

- type B1 bovine herds : herds in whose case the previous clinical history and vaccination and serological status are unknown;
- type B2 bovine herds : herds in whose case the previous clinical history and vaccination and serological status are known and in which routine monitoring tests are carried out in accordance with the national rules for bringing these herds up to type B3 or type B4 status;

- type B3 bovine herds : brucellosis-free herds within the meaning of Council Directive 64/432/EEC of 26 June 1964 on animal health problems affecting intra-community trade in bovine animals and swine;
- type B4 bovine herds : officially brucellosis-free herds within the meaning of Directive 64/432/EEC.

#### *5.2.1.2 Findings*

- As to "B1-bovine herds", the number of herds with an unknown status has decreased significantly since the last FVO inspection: in 2005, Campania had 1226 herds out of 12874 with an unknown status while in 2008 there were 261 out of 10369 herds with an unknown status. Calabria had 1559 of 8411 herds with an unknown status while in 2008 there were 3 out of 6451 such herds.
- "B 3 herds" continued being indicated as officially brucellosis free in the database.

#### *5.2.1.3 Conclusions*

The recording of the classification of herds in the database was in some cases inaccurate.

### *5.2.2 Testing regime and follow-up*

#### *5.2.2.1 Legal basis*

Council Directive 78/52/EEC lays down the minimum criteria for eradication plans in order for them to be eligible for a financial contribution by the Community. Point 1 of Article 3 thereof requires Member States (MS) to increase the proportion of the national cattle population which is subject to eradication and preventive measures so that most or all such cattle may be placed or kept under monitoring controls as soon as possible.

Council Directive 64/432/EEC lays down the requirements for brucellosis testing. According to the first sentence of Chapter II of Annex A of Council Directive 64/432/EEC, MSs are allowed to exclude males for fattening from brucellosis testing provided that they come from officially brucellosis free herds and that the CA guarantees that the males for fattening will not be used for breeding and will go directly for slaughter.

Point 1 of Article 6 of Council Directive 78/52/EEC requires the CA to ensure that, where a herd contains an animal suspected of having brucellosis, official investigations are carried out as soon as possible to confirm or rule out the presence of the disease.

Italian legislation provides police support to the OV holding visits in some areas. This was implemented on 1 January 2008.

#### *5.2.2.2 Findings*

The mission team was informed that, based on a risk analysis taking into account whether or not the region is officially free of brucellosis, herds are to be checked once a year or at least twice a year with a time-lag of three to six months, which is more strict than Community requirements. In case

of disease outbreaks, the herds concerned are checked every three weeks until they prove to be negative at least twice in tests done three months apart. The herds are then defined as officially free.

The discrepancy of the number of herds registered in the cattle database and the number of herds in the programme (see table in chapter 4.3) was explained by the CA as being caused by the exclusion of the fattening herds from the programme. The eradication programme submitted by the Italian CA exempts those herds from the testing procedures. However, no information was made available about the requirement that only male animals originating from officially brucellosis free herds can be excluded from testing, and only when they are going directly and exclusively for slaughter.

The mission team noted that

- Fattening animals excluded from testing may come only from brucellosis free herds.
- According to Italian requirements, in herds confirmed to be brucellosis infected, any animal testing positive with the rose Bengal test is considered to be positive and subject to sanitary slaughter if one animal was confirmed by the complement fixation test to be infected in the preceding test of this herd.
- In the past, legal acts (such as preliminary injunctions) hindered the implementation of the eradication programme (e.g. holding visits by OVAs could not take place because the farmers forbade their access). With the new Italian legislation in place from January 2008, providing that Local Competent Authorities (ASLs) are assisted by the police in their implementation of brucellosis measures on holdings, this is no longer a significant problem. However, the mission team was informed that this legislation is valid only until November 2009 and its extension was still under discussion.
- Although follow-up of positive cases initially took up to 5 months before the animals were culled, the time between communication and killing of the positive animals has dropped drastically to an average of two weeks.
- The number of animals tested was not always the number of animals eligible for testing and present in the holding at the time of sampling. Some of these discrepancies were explained by the database not being updated. In one case, tracing back 15 samples to a herd of 16 animals had not been possible and all animals had to be re-sampled

### 5.2.2.3 *Conclusions*

The implementation of the brucellosis testing programme is considered, in general, to be satisfactory. In particular time management of the testing for brucellosis free herds exceeds the minimum requirements of EU legislation.

## 5.2.3 *Additional movement controls*

### 5.2.3.1 *Legal basis*

Points 1 and 3 of Article 6 of Council Directive 78/52/EEC require the prohibition of animal movement to and from holdings in which brucellosis is suspected to occur or in which the presence of these diseases has been confirmed. The CA may authorise movements from these holdings for the purpose of slaughter without delay.

Article 12 of Council Directive 78/52/EEC requires all movements of cattle into and within herds covered by an eradication plan to be subject to official monitoring.

### 5.2.3.2 Findings

- Only movements to the slaughterhouse are authorised from positive holdings. This is ensured by the passports of all animals (not only the positive ones) being in the hands of the CA as they are confiscated when a holding has a positive test result.
- Any movement of cattle is subject to pre-movement testing for brucellosis in the regions visited.

### 5.2.3.3 Conclusions

The additional cattle movement control system in place, based on pre-movement testing, is, in general, likely to ensure that only animals originating from officially brucellosis free herds are moved.

## 5.2.4 Isolation, marking and transport of reactor animals

### 5.2.4.1 Legal basis

Article 6 of Council Directive 78/52/EEC requires reactor animals to be isolated and marked and require authorisation by the CA before cattle are moved out of the holdings for the purpose of slaughter.

### 5.2.4.2 Findings

- Concerning the isolation of reactor animals, the mission team noted that, at all holdings visited where such animals were present, insufficiently isolated pens were used. Animals could even touch negative animals in neighbouring paddocks.
- The loading of reactor animals for slaughter was said to be carried out under supervision by the OV who also seals the trucks. Upon unloading, the seals are collected and kept at the slaughterhouse.
- Concerning the marking of reactor animals, different procedures are in use:
  - In Campania, as all animals are already additionally identified by an individually numbered bolus, no further identification for positive animals is applied. In Calabria, only positive animals receive an individual bolus as well as a visible identification by a red ear tag (button form) with an individual number.
  - The reading of the bolus is done by a special reader which was shown in action to the mission team in both regions. In Campania the reader can be directly connected to a handheld computer which automatically transfers all necessary information on the animal and on actions taken to the database. Apart from the time the user is saving, human errors are minimised by the use of the computer. In one province the use of the computers was demonstrated to the mission team at a holding, but in the other province all available handheld computers were out of function and awaiting repair.
  - In the region of Calabria, handheld computers are not used. The bolus reader was demonstrated on cattle in a holding visited.

- Not all individual codes of the additional identification of animals had been noted in the database.

#### 5.2.4.3 *Conclusions*

While marking and transport of reactor animals to slaughter are considered adequate, the inappropriate isolation of such animals at infected holdings is considered to be a risk for the spread of brucellosis.

#### 5.2.5 *Vaccination*

##### 5.2.5.1 *Legal basis*

Point 4 of Chapter II of Annex A to Council Directive 64/432/EEC sets out the conditions for vaccination against brucellosis for the bovine herd to be considered as brucellosis-free.

Commission Decision 2002/598/EC approves the live strain RB 51 vaccine for female bovine animals (Article 2) and requires the CA to ensure that vaccinated animals are not subject to intra-Community trade (ICT), in particular by applying additional methods of marking and registration of vaccinated animals (Article 5).

##### 5.2.5.2 *Findings*

- Whilst the region of Calabria does not vaccinate against brucellosis in cattle or buffaloes, vaccination is part of the eradication programme in the region of Campania. The following findings therefore relate only to Campania.
- Although the vaccination campaign foresaw more than 30 000 animals to be vaccinated, only about 5 000 were vaccinated in 2008. The regional competent authority (RCA) decided to involve the farmers in the decision making, which allowed them to object against vaccination.
- Although holdings lose their status of officially free of brucellosis when vaccinating, several of these holdings remained as officially free in the database.
- No information on vaccinated animals was shown in the database or in the on-holding registers nor were vaccinated animals identified as such.
- The CA submitted detailed information on the vaccination programme. The vaccine used is RB 51 vaccine for animals at risk with infection of *Brucella abortus*. Storage, supply and distribution of the vaccines is under the control of the CA. Vaccines are only used by an OV.

##### 5.2.5.3 *Conclusions*

The vaccination campaign in Campania has missed the intended vaccination coverage by far. This may have negative impacts on the disease control. Other weaknesses further undermine its effect. The brucellosis vaccine used and the related conditions comply with the requirements in Commission Decision 2002/598/EC.

Vaccinated animals are not identified as such and registered as required by Article 3.5 of Commission Decision 2002/598/EC .

Although the disease prevalence is as high as in Campania, vaccination is not used as a control tool in the other region covered by the mission.

### *5.2.6 Herd and animal depopulation*

#### *5.2.6.1 Legal basis*

Point 4 of Article 3 of Council Directive 78/52/EEC requires measures to combat enzootic diseases to be systematically applied.

Point 1 of Article 7 of Council Regulation (EC) No 882/2004 requires the CA to carry out their activities with a high level of transparency.

#### *5.2.6.2 Findings*

- Where epidemiological findings would suggest depopulating a whole herd rather than just the positive animal(s), the ASL decides on this by administrative discretion depending on the circumstances of each case.
- Documents on herd depopulation and subsequent repopulation, which takes place after a vacuum period followed by cleaning and disinfection, were shown to the mission team.

#### *5.2.6.3 Conclusions*

Depopulation measures are in general considered to be adequate although there is no harmonised approach to depopulation.

### *5.2.7 Compensation*

#### *5.2.7.1 Legal basis*

Point 2 of Article 3 of Council Directive 78/52/EEC requires breeders to be appropriately compensated for animals slaughtered on the instructions of the OV.

#### *5.2.7.2 Findings*

- The RCA in both regions was said to be responsible for the compensation for animals slaughtered in the course of disease eradication.
- The mission team noted that the cattle keepers met during the mission were satisfied with the level of compensation received.
- However, the time it took for receiving the compensation payment was very variable and several times exceeded the 90 days limit required by the Italian legislation, according to which the owner has the right to ask for interest if the time limit is not respected.

### 5.2.7.3 *Conclusions*

The system in place for compensation paid for animal slaughter due to disease eradication measures is considered to be adequate.

## 5.2.8 *Cleaning and disinfection procedures and other biosecurity measures*

### 5.2.8.1 *Legal basis*

Point 1 of Article 8 of Council Directive 78/52/EEC requires instruction given by the CA to be followed during cleaning and disinfection of infected holdings after slaughter of the infected cattle.

Article 3, Point 4 of Council Directive 78/52/EEC states that measures introduced to combat enzootic diseases must be systematically applied.

### 5.2.8.2 *Findings*

- Cleaning and disinfection procedures for infected holdings were documented in almost each case checked during the mission. The disinfectants used for these purposes at the sites visited were in the list of approved disinfectants.
- The mission team noted that the OV certifies the supervision of cleaning and disinfection of vehicles that are used to transport positive animals.
- During the cleaning and disinfection of a cattle holding that was found to be positive, there were also pigs present on the farm. Information on how many pigs had been on site at the time of cleaning and disinfection did not match. One OV reported zero but another OV (from his swine vesicular disease sampling visit) reported 36 pigs present.
- Regional legislation (e.g. Deliberazione N. 846 - Area Generale di Coordinamento N. 11 - Sviluppo Attività Settore Primario – P.S.R. 2007-2013. Misura 111 "Azioni nel campo della Formazione Professionale e dell'Informazione" – Approvazione programma per l'emergenza brucellosi - Bolletino Ufficiale della Regione Campania) - N. 25 del 23 Giugno 2008) deals with biosecurity. On the holdings visited, biosecurity measures were either non-existent or insufficient, e.g. lack of disinfection mats, presence of stray dogs, and direct contact of positive animals with others in neighbouring paddocks were noted.

### 5.2.8.3 *Conclusions*

Cleaning and disinfection of the infected holdings after depopulation of positive animals is in general considered to be satisfactory.

The lack of biosecurity measures, however, is of concern.

## 5.2.9 *Laboratory Services*

### 5.2.9.1 *Legal basis*

Article 12 of Regulation (EC) No 882/2004 requires the CA to designate, assess and accredit

laboratories that carry out the analysis of samples taken during official controls. Article 18 of Regulation (EC) No 2076/2005 provides for a derogation from this requirement until 31 December 2009 if certain conditions are met.

#### *5.2.9.2 Findings*

- The regional and local Istituto Zooprofilattico (IZS) laboratories carry out the official tests for brucellosis. In addition, the national reference laboratory (IZS in Teramo) may carry out confirmatory tests.
- The laboratory visited was accredited overall as well as accredited specifically for the Rose bengal test and the compliment fixation test.
- The laboratory participated successfully in inter-laboratory proficiency tests organised by the IZS in Teramo. Evidence of the communication on this participation was shown to the inspection team.
- The time lapse between receiving the samples and the analyses outcome in the laboratory was seen to take up to three months.

#### *5.2.9.3 Conclusions*

While in general the laboratory performance was considered to be adequate, there were shortcomings in relation to tracking samples and some excessive delays for communicating results.

#### *5.2.10 Food safety controls*

##### *5.2.10.1 Legal basis*

Point I, 3 of Chapter I of Section IX of Annex III to Regulation (EC) No 853/2004 permits dairy establishments to use milk from restricted herds (but not from reactor cows) subject to authorisation by the CA.

Point 1, 3 (a) of Chapter I of Section IX of Annex III to Regulation (EC) No 853/2004 permits dairy establishments to use milk from restricted herds (but not from reactor cows) after having undergone a heat treatment such as to show a negative reaction to the alkaline phosphatase test.

Annex I of Regulation (EC) No 854/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption, describes inspection tasks of the CA, amongst them paying particular attention to the detection of zoonotic diseases (Chapter II.B.2(b)).

Article 3 of Regulation (EC) No 882/2004 requires Member States (MS) to ensure that official controls are carried out regularly, on a risk basis and with appropriate frequency.

### 5.2.10.2 Findings

#### 5.2.10.2.1 Dairy establishments

In Calabria, buffalo mozzarella production standards do not allow for pasteurisation of the raw milk. Calabria's buffaloes are very limited in numbers and are all officially free of brucellosis.

Recent changes (spring 2009) in the conditions for *Denominazione d'Origine Protetta di mozzarella di buffalo* (D.O.P. is the European trademark demonstrating the protection of its origin, in this case buffalo mozzarella, according to Council Regulation (EEC) No 2081/92 of 14 July 1992 on the protection of geographical indications and designations of origin for agricultural products and foodstuffs) in Campania do allow pasteurisation, thus here buffalo mozzarella no longer needs to be produced from raw milk. As a consequence, one dairy establishment visited in Campania pasteurises all milk they receive, the milk from positive herds being separated not by a different line but by time management, i.e. by being processed last.

The mission team visited three dairy establishments. All of them are authorised to receive milk that needs to undergo heat treatment. Two of the ones visited are in Campania and are mainly producing mozzarella cheese from buffalo milk.

Pasteurisation methods were demonstrated to the inspection team; temperature checks were shown and explained and the methods comply with the conditions to produce alkaline phosphatase negative milk.

The mission team noted that

- In one buffalo holding that had a special permit to pasteurise milk on-holding, the treatment of milk was not supervised on a regular basis by the CA.
- The documents for the daily delivery of the milk to the dairy were found to be incomplete or even incorrect. This had not been noted by the CA.
- The slips with the amount of milk mentioned the name but not the number of the supplying holding to completely identify its source.
- A discrepancy of more than 20 percent was seen in the amount of milk on the delivery slips and the milk officially received by the establishment and registered in its database as used in the processing. This had not been noted by the CA.
- In one establishment, the company records had six documents on positive herds while the CA held seven. This had not been noted by the CA.
- One establishment did not mention brucellosis in the HACCP plan. This had not been noted by the CA.
- The list of milk suppliers for milk from the region has to be updated along with the test results of the herd and the resulting health status, thus expires every 6 months. The expiry date is noted on the document. On a regular base, these permits had expired one to two weeks before the next permit was given. The dairy food business operators had continued to use the milk concerned although they were not holding any legal permit to do so. They explained to the mission team that they already knew of the favourable outcome of the tests via personal contacts with the OVs.
- Some herds that had lost their status of officially free of brucellosis, some even by two positive test rounds, were still defined as officially free from brucellosis in the database on the basis of a 15 months old entry. This had not been noted by the CA.

#### 5.2.10.2.2 Slaughterhouses

The mission team visited two slaughterhouses authorised to slaughter animals that tested positive for brucellosis. The mission team noted that information on the positive animals being sent for slaughter was sent 48 hours in advance of the animals' arrival. All the documentation (passports, movement documents) arrived with the animals and was checked by the OV before identification and *ante mortem* checks. The animals were said to be slaughtered separately at the end of normal slaughter.

#### 5.2.10.3 Conclusions

Shortcomings were identified in respect of food safety controls. However, these are considered to be of a minor risk for the consumer.

### 6 OVERALL CONCLUSIONS

Significant progress in the eradication of bovine brucellosis has been made.

However, data in the national bovine identification and registration database and regarding the implementation of the eradication programme were frequently incomplete, incorrect or not updated. This undermines planning and execution of eradication measures and, furthermore, hinders an accurate verification and follow-up of their results.

Insufficient attention to on-farm bio security leads to a risk of re-infection of officially free herds and may impede the progress of the next stages of the eradication programme.

### 7 CLOSING MEETING

A final meeting was held on 12 June 2009 in Rome with the CCA during which the mission team presented the main findings and preliminary. At this meeting, the CCA provided further information and clarification.

### 8 RECOMMENDATIONS

The Competent Authority of Italy is recommended:

N°.	Recommendation
1.	To consider reinforcing biosecurity measures to pursue the objectives laid down in Point 1, (c) of the Annex to Commission Decision 2008/341/EC;
2.	To ensure that the national database is kept up to date in accordance with the guarantees given by the Italian authorities as cited in Commission Decision

N°.	Recommendation
	2006/132/EC;
3.	To ensure that the conditions for excluding animals from the programme are in accordance with Chapter II of Annex A of Council Directive 64/432/EEC;
4.	To ensure that laboratory testing and communication of results are done within the deadlines laid down in the eradication plan approved by Commission Decision 2008/897/EC, Article 1.1.
5.	To ensure the identification and registration of vaccinated animals as required in Commission Decision 2002/598/EC, Article 3.5;
6.	To ensure that food safety requirements in relation to bovine brucellosis in fresh meat and dairy products are complied with in all relevant establishments, in particular those in Regulation (EC) No 853/2004, Annex III, Section I and IX, and Regulation (EC) No 854/2004, Annex I, Section III and Annex IV.

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

[http://ec.europa.eu/food/fvo/ap/ap\\_it\\_2009-8258.pdf](http://ec.europa.eu/food/fvo/ap/ap_it_2009-8258.pdf)

## ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Dir. 64/432/EEC	OJ 121, 29.7.1964, p. 1977-2012	Council Directive 64/432/EEC of 26 June 1964 on animal health problems affecting intra-Community trade in bovine animals and swine
Dec. 2008/341/EC	OJ L 115, 29.4.2008, p. 44-46	2008/341/EC: Commission Decision of 25 April 2008 laying down Community criteria for national programmes for the eradication, control and monitoring of certain animal diseases and zoonoses
Dec. 2007/782/EC	OJ L 314, 1.12.2007, p. 29-39	2007/782/EC: Commission Decision of 30 November 2007 approving annual and multi-annual national programmes and the financial contribution from the Community for the eradication, control and monitoring of certain animal diseases and zoonoses, presented by the Member States for 2008 and following years
Dec. 2008/897/EC	OJ L 322, 2.12.2008, p. 39-49	2008/897/EC: Commission Decision of 28 November 2008 approving annual and multi-annual programmes and the financial contribution from the Community for the eradication, control and monitoring of certain animal diseases and zoonoses presented by the Member States for 2009 and following years
Dec. 2006/132/EC	OJ L 52, 23.2.2006, p. 33;33	2006/132/EC: Commission Decision of 13 February 2006 recognising the fully operational character of the Italian database for bovine animals
Reg. 1760/2000	OJ L 204, 11.8.2000, p. 1-10	Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97
Reg. 1082/2003	OJ L 156, 25.6.2003, p. 9-12	Commission Regulation (EC) No 1082/2003 of 23 June 2003 laying down detailed rules for the implementation of Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards the minimum level of controls to be carried out in the framework of the system for the

<b>Legal Reference</b>	<b>Official Journal</b>	<b>Title</b>
		identification and registration of bovine animals
Reg. 911/2004	OJ L 163, 30.4.2004, p. 65-70	Commission Regulation (EC) No 911/2004 of 29 April 2004 implementing Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards eartags, passports and holding registers
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules