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FINAL REPORT OF A MISSION

CARRIED OUT IN

PORTUGAL

FROM 17 TO 27 FEBRUARY 2009

IN ORDER TO EVALUATE THE IMPLEMENTATION OF THE BOVINE BRUCELLOSIS AND
TUBERCULOSIS ERADICATION PROGRAMMES

In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of an endnote.

Executive Summary

This report describes the outcome of a mission carried out by the Food and Veterinary Office in Portugal from 17 to 27 February 2009. The mission was undertaken as part of the Food and Veterinary Office's planned mission programme and as part of the General Audit in Portugal, which was reflected in the approach taken for the mission and the reporting arrangements.

The overall objective of the mission was to evaluate the operation of the bovine brucellosis and tuberculosis eradication programmes which were approved for 2008 by Commission Decision 2007/782/EC. The evaluation was mainly based on the standards set out in the Annex A, B and C to Council Directive 64/432/EEC and in Council Directive 78/52/EEC. Moreover, particular attention was paid to the control system in place on holding registration, animal identification and movement of cattle. The mission assessed the performance of the competent authorities for both animal and public health, involved in the eradication of the bovine brucellosis and tuberculosis.

The report concludes that the eradication programmes for bovine brucellosis and tuberculosis have been well implemented in general and in some aspects have gone beyond the requirements of Community legislation. During the last seven years, the evolution of the disease indicators for tuberculosis has been favourable and for brucellosis stable. However, the latter was not the case for brucellosis on the island of San Miguel of the autonomous region of the Azores.

Although the competent authority had made a major effort to eradicate the diseases, the shortcomings identified, mainly in respect of uncontrolled cattle movements and the unjustified exclusion of fattening holdings, including female animals, from the eradication programmes for bovine brucellosis and tuberculosis, may delay their eradication. Moreover, deficiencies were identified in respect of food safety controls.

The report makes recommendations in respect of these conclusions to the Portuguese competent authorities, aimed at rectifying the deficiencies identified and enhancing the correct implementation of Community legislation.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
ALG	Região do Algarve
ALT	Região do Alentejo
AV	Authorised Veterinarian
B. abortus	Brucella abortus
B. melitensis	Brucella melitensis
B2, B3, B3, B4 and T2 and T3 herds	Herd classification within the meaning of Council Directive 78/52/EEC
BB	Bovine Brucellosis
BI	Beira Interior
BL	Beira Litoral
CA	Competent Authority
CCA	Central Competent Authority
CCP	Critical Control Point
CFT	Complement Fixation Test
DGV	Veterinary General Directorate
DIV	Veterinary Intervention Unit
DRDA	Regional Agricultural Development Directorate (Azores)
DSV	Veterinary Service Directorate (Azores)
DSVR	Regional Veterinary Directorate

EDM	Entre Duoro e Minho
EFSA	European Food Safety Authority
EP	Approved Eradication Programme
EP-BB	Approved Eradication Programme BB
EP-TB	Approved Eradication Programme TB
FBO	Food Business Operator
FVO	Food and Veterinary Office
HACCP	Hazard Analysis Critical Control Point
ICT	Intra-Community Trade
LINV	National Laboratory for Veterinary Research
LVT	Região de Lisboa e Vale do Tejo
M. bovis	Mycobacterium bovis
M. tuberculosis	Mycobacterium tuberculosis
MS(s)	Member State(s)
OPP	Livestock Producers' Organisation
OV(s)	Official Veterinarian(s)
PIS	Individual Health Plan
PISA	Animal Health Database
RBT	Rose Bengal Test
RC	Região Centro
RN	Região Norte

RO	Ribatejo e Oeste
SDASM	Sao Miguel Development Authority
SNIRA	National System for Animal Identification and Registration
TB	Bovine Tuberculosis
TM	Trás-os-Montes

1 INTRODUCTION

The mission was undertaken as part of the Food and Veterinary Office's (FVO) planned mission programme and took place in Portugal from 17 to 27 February 2009. The mission team comprised two inspectors of the FVO and one national expert.

The mission was undertaken as part of the General Audit in Portugal, which was reflected in the approach taken for the mission and the reporting arrangements.

The mission team was accompanied throughout the mission by a representative of the Central Competent Authority (CCA).

2 OBJECTIVES OF THE MISSION

The mission was undertaken to evaluate the operation of the approved bovine brucellosis and tuberculosis eradication programmes (EP-BB and EP-TB).

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

Competent authority visits		Comments
Competent Authority	Central	2 Opening and final meeting
	Regional	3 2 meetings with the regional veterinary services on the mainland and 1 meeting with the veterinary service of the autonomous region of the Azores
Other sites visited		
Laboratory	1	Private laboratory
Cattle holdings	6	Dairy and fattening herds
Cattle market	1	Authorised for trade with cattle originating from B4 and T3 holdings
Livestock producers' organisation	1	In charge of the implementation of the eradication programmes
Dairy plant	1	Authorised for using milk from T2 and B2 holdings
Slaughterhouses	3	Approved for slaughter of BB and TB reactor animals

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 of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

4 BACKGROUND

Council Directive 64/432/EEC highlights the importance of effective control of bovine brucellosis and tuberculosis. Since 1977 the Community has made financial measures available to support Member States (MS) in their eradication programmes.

4.1 APPROVAL OF THE ERADICATION PROGRAMMES FOR BOVINE TUBERCULOSIS AND BOVINE BRUCELLOSIS

The EP-BB and EP-TB 2006, 2007 and 2008 which Portugal submitted to the Commission services have been approved for Community co-financing by Commission Decisions 2005/873/EC, 2006/687/EC and 2007/782/EC, respectively. For 2008, the Community will pay 50 % of the costs of carrying out these disease tests, 50 % of the cost of compensation paid to owners of the slaughtered animals and 50 % of the cost of BB vaccines purchased. The maximum ceiling for these payments has been set at €1.9 million for the EP-BB and €0.347 million for the EP-TB.

4.2 EVOLUTION OF THE EPIDEMIOLOGICAL SITUATION

The following tables are based on data provided by the central competent authority (CCA) indicating the evolution of the BB and TB herd prevalence in the regions in Portugal, including the autonomous region of the Azores, from 2002 to 2007.

Table 1: Development of the BB herd prevalence from 2002 to 2007

EVOLUTION OF BB HERD PREVALENCE (%)							
Region	2002	2003	2004	2005	2006	Region	2007
EDM	0.28	0.13	0.34	0.30	0.36	RN*	0.32
TM	1.85	1.70	2.27	1.05	0.80		
BL	0.26	0.14	0.14	0.09	0.08	RC*	0.15
BI	0.73	0.46	0.77	0.76	0.54		
RO	0.37	0.39	0.50	0.35	0.67	LVT	0.32
ALT	0.87	1.33	2.01	1.66	1.97	ALT	1.46
ALG	0.39	0.33	0.00	0.34	0.18	ALG	0.00
Portugal Mainland	0.54	0.44	0.67	0.47	0.51	Portugal Mainland	0.40

S. Miguel	6,48	7,85	10,4	6,72	7,54	S. Miguel	9,6
S. Jorge	4,76	6,32	4,58	3,39	2,49	S. Jorge	0,7
Terceira	6,95	4,37	1,03	0,53	0,32	Terceira	0,07
Azores**	4.00	3.77	3.06	2.57	3.30	Azores	2.50

* In 2007, Entre Duoro e Minho (EDM) merged with Trás-os-Montes (TM) to form Região Norte (RN); Beira Litoral merged with Beira Interior to merged to form Região Centro.

** BB herd prevalence of all islands of the autonomous region of the Azores (in total 9 islands)

Table 2: Development of the TB herd prevalence from 2002 to 2007

EVOLUTION OF TB HERD PREVALENCE (%)							
Region	2002	2003	2004	2005	2006	Region	2007
EDM	0.31	0.06	0.15	0.18	0.07	RN*	0.14
TM	0.93	0.88	0.54	0.27	0.23		
BL	0.12	0.06	0.06	0.10	0.05	RC*	0.05
BI	0.31	0.32	0.35	0.25	0.14		
RO	0.13	0.34	0.55	0.35	0.36	LVT	0.19
ALT	0.61	1.19	1.24	0.76	1.10	ALT	0.46
ALG	0.00	0.00	0.00	0.00	0.00	ALG	0.00
Portugal Mainland	0.36	0.26	0.27	0.22	0.18	Portugal Mainland	0.14
Azores**	0.00	0.00	0.00	0.00	0.00	Azores	0.04

* In 2007, Entre Duoro e Minho (EDM) merged with Trás-os-Montes (TM) to form Região Norte (RN); Beira Litoral merged with Beira Interior to merged to form Região Centro.

** TB herd prevalence of all islands of the autonomous region of the Azores (in total 9 islands)

Portugal is not yet declared officially BB- and TB-free by the Community but the islands of Pico, Graciosa, Flores and Corvo of the autonomous region of the Azores have been declared officially BB-free by Commission Decision 2003/467/EC.

Concerning cases of human brucellosis, the CCA stated that from 2003 to 2007 52 cases occurred primarily caused by *Brucella melitensis* (*B. melitensis*). The European Food Safety Authority's (EFSA) Summary Report 2007 ¹ lists reported confirmed cases of brucellosis in humans in Portugal: 206 cases in 2002, 139 cases in 2003, 39 cases in 2004, 147 cases in 2005 and, 74 cases in 2006.

Concerning cases of human tuberculosis, the CCA explained that no cases related to *Mycobacterium bovis* (*M. bovis*) had been reported for years. However, no differentiation between *M. tuberculosis* and *M. bovis* is routinely made in Portugal. In 2006, Portugal notified 3,423 confirmed cases of tuberculosis in humans to the World Health Organisation ² (WHO). These were mainly associated with Human Immunodeficiency Virus (HIV) infections.

5 FINDINGS AND CONCLUSIONS

5.1 HOLDING REGISTRATION, ANIMAL IDENTIFICATION AND MOVEMENT CONTROL

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 farm, 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.

Commission Decision 2001/672/EC of 20 August 2001 requires the MS to register pastures located in mountain areas for cattle grazing during summer, to control cattle movements to and from the pastures and to record details of each movement in the national database for bovine animals within 7 days.

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.

Audit findings:

The main aspects of the system in place for holding registration, animal identification and movement controls have been described in former FVO reports DG(SANCO) 8544/2002, 9102/2003 and 9271/2003.

The mission team noted that

- Article 2 (j) of Portaria n.º 178/2007 defines a holding as a property or a set of properties where animals share the same resources and production means and Article 3 (r) of Decree-Law n.º

¹ The Community Summary Report on Trends and Sources of Zoonoses and Zoonotic agents in the European Union in 2007, The EFSA Journal (2009), p. 233

² WHO Report 2008, Global Tuberculosis Control, p. 247 http://www.who.int/tb/publications/global_report/2008/chapter_1/en/index.html

214/2008 allows a holding to consist of different parcels, contiguous or separated, given that the distance between the parcels does not exceed 10 km. This is not in line with the relevant Community legislation as the concept that the animals kept on a given holding form an epidemiological unit is not respected. In consequence parcels which are considered to be part of one holding, but do not form an epidemiological unit, are not registered as different holdings. Movements of cattle between such parcels are not notified to the cattle database, called 'National System for Animal Identification and Registration' (SNIRA) and cannot be supervised by the competent authority (CA).

- all cattle seen during the mission were properly identified and registered in SNIRA. Movements of cattle into and out of the holdings checked by the mission team were recorded in the database.

- selection of the holdings to be checked, in accordance with Commission Regulation (EC) No 1082/2003 on the basis of a risk analysis taking into account animal health considerations and in particular the existence of previous outbreaks of animal disease, is carried out centrally by the Veterinary General Directorate (DGV) on the basis of the information contained in the animal health database (PISA).

- in one region visited, animals originating from different holdings within one municipality are brought to common pastures in the mountain, for transhumance from spring to autumn. The CA considered the entire municipality including the pasture as one epidemiological unit and, therefore, the pasture was not registered as a separate holding in the SNIRA database. Although Article 18 of Decree-Law n.º 142/2006 of 27 July entitles the DGV to fix the conditions for movements of animals to common pastures, the establishment of relevant rules is still pending. Holding registers were available at the cattle holdings visited. However,

- at the cattle market visited, the holding register had not been updated (delay of two months) and contained information about the identification of cattle which had never been present at the market on a given day. It was not possible to trace the movement of cattle through the market at that day.
- holding registers were not only used to determine the presence of animals on one given holding but also to determine the ownership of the animals. This led, on one occasion checked by the mission team, to a situation where cattle which were in the ownership of the animal keeper of the given holding were registered in the holding register of that holding, but were kept on another holding.
- In both cases the holding registers had been checked by officials of the Regional Directorate for Agriculture and Fisheries (DRAP) previously and had been considered to be compliant.

Conclusions:

Cattle identification and movement records were considered in general satisfactory. However, the Portuguese definition of cattle holding / herd and the registration of holdings for transhumance are not in line with the relevant Community legislation, with the consequence that uncontrolled cattle movement may cause the spread of BB or TB, in particular in BB or TB cluster areas. The keeping of holding registers was, in general, insufficient.

5.2 IMPLEMENTATION OF THE BOVINE BRUCELLOSIS AND TUBERCULOSIS ERADICATION PROGRAMME

5.2.1 Classification of herds

Legal basis:

Chapters I and II of Annex A to Council Directive 64/432/EEC lay down the provisions for combating BB and TB, and Article 2 of Council Directive 78/52/EEC defines the different BB and TB status of the herds.

Audit findings:

The requirements for achieving and maintaining officially BB-free and officially TB-free herd status are laid down by Decree-Law n.º 157/98, Decree-Law n.º 244/2000 and by Decree-Law n.º 272/2000.

Bovine herds included in the BB-EP are classified as B2 (BB-infected), B2.1 (confirmed BB-infected), B3 (BB-free), B3S (BB-free, but status suspended), B4 (officially BB-free) and B4S (officially BB-free, but status suspended).

Bovine herds included in the TB-EP are classified as T2 (TB-infected), T2.1 (confirmed TB-infected), T3 (officially TB-free) and T3S (TB-free, but status suspended).

The mission team noted that

- the classification of herds is performed by the Regional Veterinary Directorate (DSVR), in respect of BB on the results of the Rose Bengal Test (RBT) and Complement Fixation Test (CFT) and, in respect of TB, on the basis of interpretation of the intradermal comparative skin tests carried out by authorised veterinarians (AVs) employed by livestock producers' organisations (OPPs).
- the CA classifies fattening holdings which are excluded from the EPs as B5 or T5 holdings.

Conclusions:

The classification of the health status of the holdings visited, which were included in the EPs, was satisfactory. The exclusion of fattening holdings from the EPs is not in line with Community legislation.

5.2.2 Testing regime and follow-up

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.

Annex A, B and C of Council Directive 64/432/EEC lays down the requirements for BB and TB testing.

In order to enable the TB-free status of a herd to be retained officially, point 2 (c) of Chapter I of Annex A of Council Directive 64/432/EEC allows MS or part of the MS to alter the frequency of routine TB testing to two years and to exclude male animals for fattening from TB testing, provided that all the bovine herds in this area are subject to an official programme to combat TB;

- the average of the percentages of bovine herds confirmed as infected with TB is not more than 1 % of all herds within this area during the most recent annual supervisory periods;
- the bovine animals excluded from TB testing come from officially TB-free herds and
- the CA guarantees that these male animals for fattening within an isolated epidemiological unit will not be used for breeding and will go directly for slaughter.

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 BB testing provided that they come from officially BB-free herds and that the CA guarantees that the males for fattening will not be used for breeding and will go directly for slaughter.

Points 3A and 6A of Chapter II of Annex A to Council Directive 64/432/EEC allow an animal that is isolated following a positive BB test to be reintroduced into the herd if a subsequent test has given a negative result.

Article 11 of Council Directive 78/52/EEC sets out the conditions for movements between B2 herds (if older than 12 months negative serological test, health certificate and no contact during transfer with cattle from herds of a lower health status).

Article 19 of Council Directive 78/52/EEC sets out the conditions for movements between T2 herds (negative intradermal skin test within 30 days prior to movement, health certificate and no contact during transfer with cattle from herds of a lower health status).

Article 10 of Council Directive 78/52/EEC requires the MS to ensure that official serological testing is carried in B1 and B2 herds until such time as they become B3 or B4 herds. Article 18 of Council Directive 78/52/EEC requires the MS to ensure that officially supervised intradermal tuberculin testing is carried out on all animals over six weeks old at least every six months in T1 and T2 herds until such time as they become T3 herds.

Point 1 of Articles 6 and 14 of Council Directive 78/52/EEC requires the CA to ensure that, where a herd contains an animal suspected of having BB or TB, official investigations are carried out as soon as possible to confirm or rule out the presence of the disease.

Audit findings:

Concerning the coverage of the national cattle population tested for BB and TB:

Data provided by the CCA in respect of the EP-TB for 2009 show a difference in the number of holdings and animals in SNIRA and the number of holdings and animals included in the programmes. The CCA explained that the difference between the number of holdings and animals in SNIRA and the number of holdings covered by the EPs is due to (1) the presence of fattening holdings, which are excluded from the EPs, (2) the number of animals which, in accordance with the EP-TB, are too young to be tested and (3) herds which ceased animal keeping in the last three years and which have still to be registered in SNIRA.

The mission team was informed by the CA about the number of unclassified fattening holdings excluded from the EPs in three regions: in Região Norte (RN): 4153, in Região Alentejo (ALT): 48 and in Região Centro (RC): 786.

Concerning the BB eradication:

In order to maintain the B3 or B4 herd status, all cattle older than 12 months are serologically tested for BB at least once a year. The frequency of testing increases to 6 months in herds with B2 and B2.1 herd status as well as in herds with B3.S and B4.S herd status.

On the island of San Miguel, in order to maintain the B3 herd status, three milk ring test or ELISA tests at intervals at least three months are carried out, in addition to the serological testing at least once per year.

Herds with BB positive tested animals are retested 30 days after the compulsory removal and slaughter of reactor animals. This testing regime is repeated until no positive animals are detected and then followed by another test 60 days later. The testing regime is then continued at 6 monthly intervals.

The mission team noted that in some cases the requirements in the BB-EP go beyond those of the

Community:

- The possibility of reintroducing a previously isolated BB positive tested animal into the herd when a subsequent test has shown a negative result is applied in Portugal following an epidemiological assessment by the DSVR or the Veterinary Service Directorate (DSV) / Regional Development Directorate (DRDA) in the Azores.
- In B4 holdings at the request of the CA the CFT is carried out in addition to the RBT on all animals which have tested negative with the RBT whenever a BB infection was confirmed with the CFT.
- In herds confirmed to be BB infected, any animal testing positive with the RBT is considered to be positive and subject to sanitary slaughter if one animal was confirmed by the CFT to be infected in the preceding test of this herd.
- In herds confirmed to be BB infected the female offspring up to 12 month of BB positive tested cows are also slaughtered.

However, the mission team noted that at one B2 holding visited, the interval between the retests of the cattle was delayed several times and in one case by more than 120 days.

Concerning TB eradication:

In order to maintain the T3 herd status, the testing frequency and the age of cattle tested varied from one DIV area to another. In DIVs with TB herd prevalence below 1 %, cattle were tested at least yearly and, in DIVs with prevalence below 0.2 %, at least every second year. In June 2008, 9 DIVs belonged to the former category and 13 DIVs to the latter one.

In herds confirmed to be infected with TB (T2.1 holdings) all animals with inconclusive test results are considered as infected and will be slaughtered if in a herd test one animal gives a positive result. This goes beyond the relevant Community requirements.

However, the mission team noted that

- in DIV areas with herd prevalence below 1% but above 0.2% the age of cattle TB tested was altered from 6 weeks to one year. This is not in line with the relevant Community provisions where it is foreseen to alter in this case the test frequency and not the age of the cattle to be TB tested.
- in one DIV area visited with herd prevalence below 1% but above 0.2%, cattle were tested every four years starting at an age over 6 weeks.

Concerning the performance of the TB skin test:

- TB testing and follow-up measures are performed by AVs employed by the OPPs.
- In one region visited the AVs complete a testing form which has been created by the PISA database at the responsible OPP, including the eartag number of the cattle of the holding to be tested. In the course of BB sampling and TB testing the AVs update this herd list and forward it to the OPP. At the OPPs, the amended herd list and test results are entered in PISA. Cross-checks with the SNIRA database were carried out in suspect cases in order to verify whether all eligible herds and animals (age, gender) were tested. In the other regions visited, the SNIRA database was used to produce these lists which facilitate the testing of all eligible animals.
- The intradermal comparative tuberculin test is applied.
- Two holdings were visited by the mission team in order to check ongoing TB testing. It was noted that the inoculation sites were clipped and the testing and reading are performed as required.

Concerning information provided to the animal keeper about the results of the BB and TB tests and follow-up measures:

- The follow-up measures are enforced through the issuing of official letters by the DSVR to the animal keepers informing them about the occurrence of BB or TB in the herd, the date of retesting and the measures to be implemented at holding level.
- However, at one dairy holding visited, the animal keeper had not been informed that he should not use the milk of the positive animals for his own consumption.

Concerning follow-up measures applied after detection of suspect cases due to BB and TB:

The CA informed the mission team that, in 2007

- 414 TB positive cases were detected by means of the skin test. 313 samples were microbiologically tested for TB (with 171 positive results).
- 1,083 BB positive cases were detected in the course of serological testing. 350 samples were tested microbiologically for BB (with 152 positive results).
- Where suspected TB lesions were detected during routine slaughter, the holding of origin was put under restriction by the DSVR or by the Sao Miguel Development Authority (SDASM), the date of the last tuberculin skin test and the number of the tested cattle were checked and epidemiological investigations commenced.

Concerning the conditions for fattening holdings:

Cattle kept in fattening holdings are excluded from any testing for BB and TB.

Fattening holdings are allowed to receive male and female animals from officially BB- and TB-free herds if the herd prevalence in the area of a given DIV is less than 1% in the last two years.

At one B2 holding visited, animals were frequently moved to “specialised” fattening holdings. The CA informed the mission team about the existence of 13 holdings of this type, in total, in Portugal which are allowed to receive cattle from T2 and B2 holdings and which are excluded from the EPs.

The movement of cattle from fattening holdings to breeding holdings is forbidden. No movement documents would be issued by the DIV. However, movements between fattening holdings take place. At the slaughterhouses visited, in all cases checked by the mission team, fattening cattle had passed through more than one fattening holding prior to slaughter. At one market visited, animals originating from fattening holdings were traded without taking precautions to prevent direct or indirect contact between these animals and animals from B4 or T3 herds.

At the fattening holdings visited, no special bio-security measures were applied. The CA stated that the general requirements for bio-security measures for cattle holdings are also applicable to fattening holdings which practise continuous restocking.

Conclusions:

The exclusion of thousands of cattle herds from the EPs does not take into account the requirement that all cattle herds must be included in co-financed EPs and only male animals can be excluded from TB and BB testing.

The implementation of the EP-BB and the EP-TB in the holdings included in the EPs is considered, in general, to be satisfactory. In some areas the CA has even chosen a stricter approach than required by Community legislation. However, the alteration of the testing age and frequency is not always in line with Community legislation. In consequence, in Portugal only breeding cattle older than 12 months are tested for TB.

Movement of cattle between unclassified fattening herds which are excluded from BB and TB testing is not in line with Community legislation, in particular when cattle are moved from unclassified fattening holdings to markets which are only authorised for trade with cattle originating from B4 and T3 herds.

The movement of cattle from B2 or T2 herds to unclassified fattening holdings without further testing is not in line with Community legislation. As it is likely that infected animals are introduced in unclassified fattening holdings an unknown number of these unclassified fattening herds may be chronically BB or TB infected.

5.2.3 Additional movement controls

Legal basis:

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.

Point 1 (c) of Chapter I of Annex A of council Directive 64/432/EEC sets out the conditions for pre- or post-movement TB testing.

Audit findings:

Only cattle from B4 and T3 herds may move to another holding with the same health status accompanied with a movement declaration issued by the keeper.

Following positive TB or BB test results, the DSVR or the SDASM seize the cattle passports of the entire cattle herd concerned in order to ensure that the imposed movement ban is respected.

Breeding cattle have to be tested against BB and TB within 30 days prior to movement.

Within 30 days prior to embarkation, fattening cattle leaving the autonomous region of the Azores islands to the mainland have to undergo a pre-movement test for TB when older than 6 weeks and for BB when older than 12 months.

However, the mission team saw no evidence that movement of cattle within herds is subject to official monitoring.

Conclusions:

The cattle movement control systems in place, based on pre-movement testing, is, in general, able to ensure that only animals originating from officially BB- and TB-free herds are moved. However, this system is undermined by unmonitored movement within herds and uncontrolled movement between holdings, as described in Chapter 3.1 of this report Part B.

5.2.4 Isolation, marking and transport of reactor animals

Legal basis:

Articles 6 and 14 of Council Directive 78/52/EEC require 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.

Findings:

Concerning the isolation of reactor animals, the mission team noted that, at all holdings visited with reactor animals, sufficiently isolated pens were used and were under the control of the responsible OV while in use.

The loading of reactor animals for slaughter was carried out under supervision by an OV or by an official technician.

Concerning the marking of reactor animals, different procedures are in use:

- At one B2 holding visited, the CA informed that reactor cattle were hot branded prior to loading for slaughter.
- At another B2 holding visited the reactor animals were not marked. The CA explained that in the given region entries in the cattle passport about the BB test results are considered as sufficient.
- On the autonomous region of the Azores, at one slaughterhouse visited photographs of the reactor animals were attached to the cattle passports.

Conclusions:

Whilst the isolation of reactor animals at infected holdings and the supervision of their transport to the slaughterhouse are considered to be satisfactory, the marking of these animals was insufficient in some cases.

5.2.5 Vaccination

Legal basis:

Point 4 of Chapter II of Annex A to Council Directive 64/432/EEC sets out the conditions for vaccination against BB.

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).

Findings:

Vaccination is applied in cases deemed justified by the DGV or on the initiative of the DSVR. For the time being, vaccination is applied in Portugal in areas of Região Alentejo (ALT) and Região Norte (RN) and on three islands of the autonomous region of the Azores (San Miguel, San Jorge and Terceira).

In 2002, female animals were vaccinated with RB 51 vaccine and in the following years vaccination has been applied to offspring between 4 and 12 months of age.

In 2007, on the mainland, in RN, 1,008 cattle kept in 473 holdings and in ALT, 963 cattle kept in 10 holdings were vaccinated. Within the scope of the special vaccination RB 51 programme, a written protocol called Individual Health Plan (PIS) is entered into by the DSVR with the agreement of the owner of the holding and the AV responsible for the holding who vaccinates the cattle. This protocol lays down the measures to be undertaken to control the disease, to avoid infection of other herds as well as to prevent the recurrence of the disease in the herd. For example, at one holding visited, a PIS arrangement with the DVG was in place for the tailor-made vaccination of this holding which excludes the vaccination of cattle younger than 12 months. It was explained that these animals were slaughtered by the age of 8 months (contract with a supermarket chain).

In 2007, on the autonomous region of the Azores, 35,402 cattle kept in 3,569 holdings were vaccinated. According to the information provided by the CA, the BB herd prevalence and vaccination coverage vary between the three islands of the autonomous region of the Azores:

- On the island of Terceira since 2003 the vaccination coverage was about 100% and during this time the herd prevalence dropped from 4.37 % to 0.07 %.
- On the island of San Jorge the vaccination coverage increased from about 30% in 2003 to 90 % in 2007 and the herd prevalence dropped from 6.32 % to 0.7 %.
- On the island of San Miguel vaccination coverage increased from 25 % in 2003 to 75 % in

2007 but the herd prevalence increased from 7.85 % to 9.6 %.

The SDASM explained that the reasons for the lower vaccination coverage on the island of San Miguel are related to:

- the non-acceptance of the vaccination by the private veterinary practitioners who are not authorised by the SDASM to carry out BB sampling and BB vaccination;
- a shortage of staff of the SDASM with the consequence that all eligible cattle were not always vaccinated at the required frequency and serological testing was not carried out as required by the BB-EP for the autonomous region of the Azores. For example, at one holding visited, the female offspring were vaccinated yearly with the exception of one year, due to the work overload of the OV who was responsible for the vaccination.

The CA informed the mission team that vaccinated cattle are not marked but the vaccination is noted in the cattle passport of the animal.

Conclusions:

On the mainland and on the islands San Jorge and Terceira, the BB vaccination campaign is well established and the disease indicators are favourable. In particular the PIS agreement is an effective tool to enhance the disease situation. However, the evolution of BB on San Miguel is alarming, due to the lower vaccination coverage of the eligible cattle population, and also due to uncontrolled movement of cattle as described above.

The marking of vaccinated animals is not in accordance with requirements intended to prevent their entry into ICT.

5.2.6 Supplementary tests

Legal basis:

Point 3 of Annex B to Council Directive 64/432/EEC sets out the conditions for supplementary testing (gamma-interferon test) in order to enable the detection of the maximum number of TB infected and diseased animals in a herd or a region.

Audit findings:

In order to detect the maximum number of infected animals in a herd, the CA authorised the use of the gamma-interferon test, in particular,

- if one animal in a herd shows a positive reaction,
- if a herd shows a significantly high number of positive animals and
- in a holding where consecutive tests resulted in positive results.

In 2006, 2,686 gamma-interferon tests (with 17 positive results) and in 2007, 688 gamma-interferon tests (with 130 positive result) were carried out.

The brucellosis skin test (BST) is not in use in Portugal.

Conclusions:

The application of the gamma-interferon test is considered satisfactory.

5.2.7 Epidemiological investigations

Legal basis:

Point 3A (b) of Chapter I of Annex A to Council Directive 64/432/EEC requires the CA to carry out epidemiological examinations following the suspension of the officially TB-free herd status.

Point 3B (d) of Chapter I on Annex A to Council Directive 64/432/EEC requires the CA to trace and check any herd considered to be epidemiologically related to the index herd.

Audit findings:

Epidemiological investigations were carried out at holdings in which cattle infected or suspected to be infected with BB or TB were detected. These investigations were performed in accordance with guidelines issued by the CCA which prescribe the use of a standard form. However, no information was available at central level about the total number of epidemiological investigations performed following the confirmation of BB or TB infections.

The outcome of the epidemiological investigations checked by the mission team was vague in respect of the determination of the likely source of infection. Concerning the possible sources of BB and TB infections, the DGV explained that “earth borne” infections are the main reason for the spread of these diseases. Although the checklist used for epidemiological investigations foresees questions in respect of the possibility of transmission of TB and BB from wildlife and humans, no exact information was available about these sources. However, the mission team was informed:

- by the SDASM that, on the island of San Miguel, seagulls are important vectors for transmitting *B. abortus*. Seagulls had been observed picking up placentas of infected cows and dropping them on separate sites;
- by the EFSA’s Summary Report 2007 on *M. bovis*-infected wildlife in Portugal: 37 out of 73 tested deer and 9 out of 28 tested wild boar were positive.
- that, although the EP-BB stipulates that in the course of epidemiological surveys, dogs are to be included in the field inspection, dogs kept on BB-infected holdings are not serologically tested for *brucellosis*.

The DVG did not compile information about the exact figures of the identified sources of the TB and BB infection for previous years in order to allow an evaluation of the trends and weighting of each source.

Spoligotyping, a genetic fingerprinting technique, is performed routinely by the National Laboratory for Veterinary Research (LNIV) in order to distinguish between different strains of *M. bovis*, enabling patterns of origin, transmission and spread to be described.

Conclusions:

The value of the epidemiological investigations is questionable because the source of the BB or TB infection could not be determined in any case checked by the mission.

5.2.8 Herd depopulation

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.

Audit findings:

There is a policy of herd depopulation in place which is established by the DGV. The responsible DSVR decides on whole-herd slaughter in accordance with a Manual of Procedures when any of the

following conditions are met:

- No improvement of the health status of the holding in question within the last 12 months in the case of BB and in the last 6 months in the case of TB;
- Isolation of *B. abortus* or *M. bovis*;
- Anticipation of improvement of the epidemiological situation of the disease in a particular geographical area;
- Obstacles to implementing prophylactic and sanitary measures in the holding.

For the moment the CA does not intend to depopulate the remaining 150 herds infected with BB or TB on the mainland.

According to the information provided by the DGV from 2005 to 2007, herd depopulation was carried out as follows:

Table 3: Number of herds infected with BB or TB and number of herds depopulated due to BB or TB in Portugal from 2005 to 2007

	BB infected herds	Herds depopulated due to BB	TB infected herds	Herds depopulated due to TB
2005	271	12	136	5
2006	266	19	104	6
2007	107	16	70	5

On the autonomous region of the Azores, in 2007, there were 254 BB-infected holdings. None of them was depopulated.

Conclusions:

The procedures in place for herd depopulation are systematically applied, with a high level of transparency, and are considered to be adequate.

5.2.9 Compensation

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.

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.

Audit findings:

The compensation system of Portugal is based on Order No 205/2000 of 5 April and Joint Order No 530/2000 of 16 May laying down the compensation scales for the mandatory slaughter of animals under national disease eradication programmes covering all types of cattle. The Financing Institute for Agriculture and Fisheries (IFAP) is responsible for the compensation for animals slaughtered in the course of disease eradication.

Calculation of the value of an animal is made by a computer system, called PSNA. The weight of the carcasses of animals being slaughtered (minus 2 % for drip) determines the base value for

compensation paid directly by IFAP to the owner of the animal (€ 1.96 / kg). In addition to this the owner receives compensation for the potential of the animal, for example for a milk cow younger than 6 years: €698.32, or for a meat calf between 3 and 8 months of age of native breeds: €149.70. On top of this, for animals entered in the herd-book or zoo-technical register, the owner gets 15 % over the total amount.

The mission team noted that the cattle keepers met during the mission were not satisfied with the compensation scheme in place because the financial damage following a BB or TB outbreak is larger than the amount of compensation payment.

Conclusions:

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

5.2.10 Cleaning and disinfection procedures at holdings, transport vehicles and markets

Legal basis:

Points 1 of Article 8 and of Article 16 of Council Directive 78/52/EEC require instruction given by the CA to be followed during cleaning and disinfection of infected holdings after slaughter of the infected cattle.

Points 3 of Article 8 and of Article 16 of Council Directive 78/52/EEC require the means of transport to be cleaned and disinfected after transport of reactor animals, and the disinfectant used for the disinfection of infected premises, transport vehicles, etc and its concentration, to be authorised by the CA.

Audit findings:

Cleaning and disinfection procedures for infected holdings were available and were followed in each case checked during the mission. The disinfectant used for these purposes at the sites visited was listed in the list of CCA approved disinfectants.

Concerning the cleaning and disinfection of means of transport, the mission team noted that:

- at one slaughterhouse visited the means of transport owned by the slaughterhouse were cleaned and disinfected with an approved disinfectant following procedures laid down by the Food Business Operator (FBO), and records were kept about the cleaning and disinfection of means of transport.
- However, at another slaughterhouse visited, the FBO did not supervise the cleaning and disinfection of means of transport not owned by the slaughterhouse and used to transport reactor animals.
- Moreover, the official inspections did not cover the control of the FBO's obligation to ensure that the means of transport which brought BB and TB reactor animals to the slaughterhouse were properly cleaned and disinfected before leaving the slaughterhouse.

Conclusions:

Whilst the cleaning and disinfection of the infected holdings is considered to be satisfactory the supervision of the means of transport after the transport of reactor animals was insufficient.

5.2.11 Laboratory Services

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.

Audit findings:

In the framework of the EP-BB, the regional private laboratory visited carries out the RBT and, for confirmation of positive RBT results and some with negative RBT results, depending on the health status of the holding, the CFT. Concerning TB testing, the laboratory carries out all gamma-interferon tests for that region but no bacteriological or histo-pathological examination are performed (tissue samples are sent by the OV's of the slaughterhouses to the LNIV). In 2008, 133,782 RBT, 24,338 CFT and 1,080 gamma-interferon tests were carried out.

The laboratory visited was approved in 2002 by the DSVR for the RBT and the CFT, and in 2004 for the gamma-interferon test. It is in the process of accreditation whose application to the Portuguese Accreditation Institute is expected to be submitted by the end of 2009.

The laboratory participated successfully in inter-laboratory proficiency tests for the RBT and CFT in 2004. SOPs for the RBT and the CFT drawn up by the LNIV were provided to the mission team.

The mission team noted that

- the standard operational procedures (SOP) of the gamma-interferon test were not up-dated and the procedures for the conditions for acceptance of the samples for the gamma-interferon test contained handwritten changes, from 8 hrs to 30 hrs. However, the mission team was provided with an instruction issued by the LNIV on how to handle the samples correctly. Moreover, it was explained that the majority of the tests were carried out within 8 hrs of taking the samples³.
- in 2003, the LNIV carried out an inspection of the laboratory with a favourable result.
- in order to be qualified for laboratory work, technical staff have to participate in a two-week course in respect of laboratory methods for technicians at the LNIV. The last refresher course in which staff participated was held in 2003. For another course in 2004, no documented evidence of participation could be provided.

Conclusions:

At the private laboratory visited the training of the staff are considered inadequate and the supervision of the laboratory by the LNIV insufficient. In consequence, the reliability of the test results is called into question and may jeopardise the application of follow-up measures.

5.3 FOOD SAFETY CONTROLS

Legal basis:

Point 12 of Chapter IV of Annex III to Regulation (EC) No 853/2004 lays down the physical conditions for carrying out *post mortem* inspection.

Chapter I of Section IV of Annex I to Regulation (EC) No 854/2004 lays down the requirements for *post mortem* examination.

Point E.2 of Chapter IX of Section IV of Annex I to Regulation (EC) No 854/2004 requires that all meat from animals with localised TB lesions in a number of organs or a number of areas of the

³ In their response to the draft report the CA stated that on 17 September 2009 an audit of the laboratory was carried out by the LNIV's audit team which noted that these handwritten changes of the procedures were not implemented.

carcass, is to be declared unfit for human consumption.

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.

Audit findings:

The mission team visited three slaughterhouses: Two of them were authorised to slaughter all reactor animals of entire regions following a public tender, the third one was the only slaughterhouse located on the island of San Miguel of the autonomous region of the Azores.

The mission team noted that

- the list of the reactors to be slaughtered was sent by DSVR to the FBO at least two days in advance. All the documentation (passports, movement documents) arrived with the animals and was first checked by the FBO and then by the official veterinarians (OVs).
- At the slaughterhouse the reactor animals were marked with a hot brand triangle on the left side of the neck. They were slaughtered separately at the end of normal slaughter. Special hygiene precautions were taken – each worker on the line was wearing a face mask and gloves.
- *ante mortem* and *post mortem* inspection were carried out by OVs.

Concerning *post mortem* examination, the following shortcomings were noted at one slaughterhouse visited:

- The way the heads of the animals were presented for examination did not allow inspectors to carry out a proper visual inspection of the incised retropharyngeal and submaxillar lymph nodes.
- The tongue was not palpated.
- The lungs were only visually examined – no palpation was carried out. The trachea and the main branches of the bronchi were not opened.
- The intestines were only visually inspected. No inspection or palpation of the mesenteric and gastric lymph nodes was carried out.

When lesions suspected to be due to TB were found during normal slaughter, samples for laboratory examination were taken and the OV notified the relevant veterinary service immediately. From 2006 to 2008, in Portugal, in total 183 cases suspected to be due to TB were detected during normal slaughter.

The mission team visited one dairy establishment. The CCA stated that there are no dairy establishments in Portugal producing unpasteurised cow milk or cow milk products. The CCA informed the mission team that in principle all dairy establishments can receive milk from positive holdings if the milk is heat treated. Therefore, the establishment visited did not have approval or authorisation to receive milk from holdings with suspended or withdrawn health status.

In the establishment visited the FBO stated that pasteurisation was carried out at a minimum of 72°C for 15 seconds or not less than 135°C (ultra-pasteurisation) and was covered as a CCP in the establishment's HACCP programme. However, the mission team noted that

- no proof could be provided that the time period for the heat treatment (15 seconds for normal pasteurisation) was respected. The flow-chart recording the terms of the heat treatment did not indicate the time period of the pasteurisation process or the applied

pressure on the milk before and after the pasteurisation. However, the FBO explained that in the case of deviations in temperature and time the pasteurisation would be automatically repeated.

- the temperature measurement device of the pasteuriser had not been calibrated for years.
- no suitable test such as the alkaline phosphatase test was used to verify the effect of the pasteurisation, not even for the heat treatment of milk from cows originating from B2 holdings. Instead, the heat treated milk was tested in order to selectively determine the *Escherichia Coli* count. This test did not present a method to determine the effect of the pasteurisation in respect of inactivating *B. abortus* and *M. bovis*.
- since the approval of the establishment in 2003, official inspections have not specifically included controls on the effects of the pasteurisation. The responsible OV agreed with the mission team that the records which could provide proof of the effectiveness of the heat treatment were not auditable.

A list of milk suppliers, including information about their health status, was kept by the FBO. The regional veterinary service forwards any change of the health status of the suppliers immediately to the FBO.

Conclusions:

Deficiencies were identified in respect of food safety controls. At one slaughterhouse visited, which was authorised to slaughter reactor animals, the *post mortem* examination of bovine animals was poorly carried out. At one dairy plant visited, which received milk from infected holdings, the effectiveness of the pasteurisation was questionable, because it was not verified. In consequence, it cannot be excluded that milk unfit for human consumption might enter the food chain.

6 OVERALL CONCLUSIONS

During the last seven years, the evolution of the disease indicators for TB is favourable and for BB stable. However, the latter was not the case for BB on the island of San Miguel of the autonomous region of the Azores⁴.

The eradication programmes for BB and TB are well implemented in general and in some aspects go beyond the requirements of EU legislation. Although the CA has made a major effort to eradicate the diseases, the shortcomings identified, mainly in respect of uncontrolled cattle movements and the unjustified exclusion of fattening holdings, including female animals, from the EPs, may delay their eradication.

Deficiencies were identified in respect of food safety controls

7 CLOSING MEETING

A final meeting was held on 27 February 2009 in Lisbon with the CCA during which the mission team presented the main findings in respect of horizontal issues concerning the implementation of Regulation (EC) No 882/2004 and the main findings and preliminary conclusions of the specific audit in respect of the implementation of the approved BB and TB eradication programmes. At this meeting, the CCA provided further information and clarification and expressed also disagreement in some points mainly regarding the reliability of the laboratory results at the laboratory visited, the

⁴ In their response to the draft report the CA stated that the BB herd prevalence on the island San Miguel of the Azores was 0.6 % in 2008.

definition of holding / herd and the movement of cattle between unclassified fattening holdings.

8 RECOMMENDATIONS

The Competent Authority of Portugal is recommended:

Nº.	Recommendation
1.	to bring the definitions of "holding" and "herd" into line with those provided by Article 2 of Council Regulation (EC) No 1760/2000 and by Article 2 of Council Directive 64/432/EEC.
2.	to register pastures for cattle grazing during summer located in mountain areas and to control cattle movements there as required by Commission Decision 2001/672/EC.
3.	to increase the proportion of the national cattle population which is covered by the eradication and preventive measures with the goal that most or all such cattle may be placed or kept under monitoring controls as soon as possible, as required by Point 1 of Article 3 of Council Directive 78/52/EEC, in order to accelerate the eradication of bovine brucellosis and tuberculosis as required by Articles 2 and 3 of Council Directive 77/391/EEC.
4.	to ensure that only male animals for fattening are excluded from TB testing in a defined area provided that (1) all the bovine herds in this area are subject to an official programme to combat TB, (2) the bovine animals excluded from TB testing come from officially TB-free herds and (3) the CA guarantees that these animals for fattening within an isolated epidemiological unit will not be used for breeding and will go direct to slaughter as required by Point 2 (c) of Chapter I of Annex A to Council Directive 64/432/EEC.
5.	to ensure that only males for fattening are excluded from BB testing provided that (1) they come from officially BB-free herds and that (2) the CA guarantees that the males for fattening will not be used for breeding and will go direct to slaughter in accordance with first sentence of Chapter II of Annex A to Council Directive 64/432/EEC.
6.	to alter the age of the cattle to be tested for TB and the frequency of TB testing in accordance with Point 2 (c) of Chapter I of Annex A to Council Directive 64/432/EEC.
7.	to ensure that eligible cattle originating from B2 or T2 herds which were moved to fattening herds are further tested for BB and TB until such time as these fattening herds become B3/B4 or T3 herds, as required by Articles 10 and 18 of Council Directive 78/52/EEC.
8.	to ensure that reactor animals and vaccinated animals are marked as required by Articles 6 and 14 of Council Directive 78/52/EC and by Article 5 of Commission

Nº.	Recommendation
	Decision 2002/598/EC, respectively.
9.	to ensure that all movements of cattle within herds are subject to official monitoring, as required by Articles 12 and 20 of Council Directive 78/52/EEC.
10.	to consider to establish, on the island of San Miguel of the autonomous region of the Azores, agreements between the veterinary service, the animal owner and the private veterinarians in order to increase the BB vaccination coverage.
11.	to consider to strengthen the efforts to determine in the course of epidemiological investigations the possible sources of infection with BB or TB.
12.	to ensure that, following transport of reactor animals, the means of transport are cleaned and disinfected as required by Point 3 of Article 8 and of Article 16 of Council Directive 78/52/EEC.
13.	to ensure that laboratories that carry out the analysis of samples taken during official controls are designated, assessed and accredited by the CA as required by Article 12 of Regulation (EC) No. 882/2004.
14.	to ensure that the requirements for post mortem examination, as laid down by Chapter I of Section IV of Annex I to Regulation (EC) No 854/2004, are respected.
15.	to ensure that dairy establishments are only authorised to put on the market milk from restricted herds (but not from reactor cows) that has undergone a heat treatment such as to show a negative reaction to the alkaline phosphatase test as required by Point 1, 3 (a) of Chapter I of Section IX of Annex III to Regulation (EC) No 853/2004.

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

http://ec.europa.eu/food/fvo/ap/ap_pt_2009-8248.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
Dir. 78/52/EEC	OJ L 15, 19.1.1978, p. 34-41	Council Directive 78/52/EEC of 13 December 1977 establishing the Community criteria for national plans for the accelerated eradication of brucellosis, tuberculosis and enzootic leukosis in cattle
Dir. 77/391/EEC	OJ L 145, 13.6.1977, p. 44-47	Council Directive 77/391/EEC of 17 May 1977 introducing Community measures for the eradication of brucellosis, tuberculosis and leucosis in cattle
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 identification and registration of bovine animals
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,	Regulation (EC) No 882/2004 of the European

Legal Reference	Official Journal	Title
	p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	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
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
Dec. 2002/598/EC	OJ L 194, 23.7.2002, p. 45-46	2002/598/EC: Commission Decision of 15 July 2002 approving vaccines against bovine brucellosis within the framework of Council Directive 64/432/EEC
Dec. 2003/467/EC	OJ L 156, 25.6.2003, p. 74-78	2003/467/EC: Commission Decision of 23 June 2003 establishing the official tuberculosis, brucellosis, and enzootic-bovine-leukosis-free status of certain Member States and regions of Member States as regards bovine herds
Dec. 2005/873/EC	OJ L 322, 9.12.2005, p. 21-28	2005/873/EC: Commission Decision of 30 November 2005 approving programmes for the eradication and monitoring of animal diseases, of certain TSEs, and for the prevention of zoonoses presented by the Member States for the year 2006
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. 2001/672/EC	OJ L 235, 4.9.2001, p. 23-25	2001/672/EC: Commission Decision of 20 August 2001 laying down special rules applicable to movements of bovine animals when put out to summer grazing in mountain areas
Dec. 2006/687/EC	OJ L 282, 13.10.2006, p. 52-59	2006/687/EC: Commission Decision of 12 October 2006 on programmes which qualify for a Community financial contribution in 2007 for the

Legal Reference	Official Journal	Title
		eradication and monitoring of certain animal diseases, for the prevention of zoonoses, for the monitoring of TSEs as well as programmes for the eradication of BSE and scrapie