

ANNEX

NSVFSA comments:

1. The National Sanitary Veterinary and Food Safety Authority makes the following comments regarding the findings of FVO inspectors from section 5.2 "Competent Authorities" where it is mentioned that Animal Health and Welfare Directorate is responsible for the organisation of the BSE epidemio-surveillance programme and sampling for feed ban controls: Animal Health and Welfare Directorate is responsible only for the organisation of the BSE epidemio-surveillance programme, while Technical Directorate for Coordination of NRL, CSVFSL, Farmacovigilance and Animal Nutrition, is responsible for the organisation of sampling for feed ban controls.
2. The National Sanitary Veterinary and Food Safety Authority makes the following comments regarding the findings of FVO inspectors from section 5.3.1, fifth paragraph to the draft report: according to Art.1, section 16 from the Order of the President of the National Sanitary Veterinary and Food Safety Authority no. 40/2010 regarding the approval of sanitary and veterinary norm for the implementing process of identification and registration of pigs, sheep, goats and bovines, for backyards holdings, the holding register is the collection of documents that are issued to the farm owner when animal movements are recorded, including the initial identification, by storing those documents in chronological order, properly filed and carefully preserved by the owner for a minimum of 3 years from the date the holding closed. In accordance with Art.10 par. 2), letter a), point 4 of the above mentioned Order, each farm owner must keep the register holding properly, updated and archived for veterinary control for a minimum of 3 years from the date the holding closed;
3. The National Sanitary Veterinary and Food Safety Authority makes the following comments regarding the findings of FVO inspectors from Section 5.3.1, fifth paragraph from the draft report: conditions were created in order to be able to extract and verify information in national data base. By Service Note no. 2239 from August 1, 2007 the National Veterinary and Food Safety Authority sent to the counties the inspection procedure for holdings, according to EC Regulation 1082/2003 which sets out the minimum checks to be made in the system of cattle identification and registration and Regulation 1505/2006 – which sets out the minimum checks to be made in relation to sheep and goat identification and registration and inspection sheet which will be used to achieve them. The reports "report holding" and "holding register" which give animals / species that are found in that holding on a precise date, respectively those who went through the holding, the origin and their destination, in a period of time, can be extracted from the National Data Base at any level (NSVSD/CSVSD). Thus, as can be seen from the inspection procedure (slides 9 and 11) and the inspection sheet, inserted below, in order to make an inspection in a holding, from the National Data Base reports referred above must be extracted, which are taken by inspectors for the visit in the holding, where there are compared with the reality of the holding. We attach, service note no. 2239 from August 1, 2007 through out was sent to the counties holding inspection procedure and holding inspection sheet.

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4. The National Sanitary Veterinary and Food Safety Authority makes the following comments regarding the findings of FVO inspectors in section 5.3.2. "passive surveillance", where it is mentioned that "only 2 of these suspected animals were sampled and tested with negative results": in compliance with excel table attached 8 animals were declared as BSE suspect in 2009, 7 of these animals were slaughtered, samples were taken, and bulletin of analysis exists with negative results to confirmatory tests performed by the NRL, only one animal hasn't been slaughtered as it was put under clinical observation and treated, after treatment the clinical signs have disappeared and the animal was declared clinically healthy, thus eliminating BSE suspicion. We attach the 8 bulletin of analysis showing that samples were taken and confirmatory tests were performed to rule out the BSE suspicion.
5. The National Sanitary Veterinary and Food Safety Authority makes the following comments regarding the findings of FVO inspectors from section 5.3.3 "Active surveillance" where it is mentioned that „While commercial farms perform such activity infrequently and notify it to officials, there are no such notifications from backyard farms": the slaughter of bovines in commercial farms occurs only in case of emergency (accidents), and this decision is taken only when the distance to the nearest slaughterhouse is too high and thus the welfare conditions are not met or when the slaughterhouse refuse to receive such animals; also, we consider that the words "no such notifications from backyard farms" must replace with "there are few such notifications from backyard farms" since in 2010 over 300 such notifications were reported, samples were taken and tested for BSE.
6. The National Sanitary Veterinary and Food Safety Authority makes the following comments regarding the findings of FVO inspectors in section 5.4. "measures following suspicion/confirmation of BSE", where it is mentioned NSVFSA stated that so far no single case of BSE has been notified, and considers that the word "notified" in the text should be replaced with "confirmed" as all clinical and laboratory suspicions of BSE were notified, and based on confirmatory tests conducted by the NRL, no case of BSE was confirmed, so there wasn't any reason to notify anything in this regard.
Also, the National Sanitary Veterinary and Food Safety Authority makes the following comments regarding the findings of FVO inspectors in section 5.4. "measures following suspicion/confirmation of BSE", where it is mentioned that only one clinical BSE suspect was tested in accordance with procedure foreseen for suspect cases, the other was tested only with a rapid test and no confirmatory test were carried out: during the visit in the county, the bulletin of analysis that was verified was the one performed by the county laboratory, but the sample was also sent to the NRL for confirmation of diagnosis. We attach the bulletin of analysis showing that a confirmatory test was performed also for the bovine with identification number RO297000197198, and which proves that relevant procedures was followed. Based on this new proofs, we ask also to eliminate from point 5.7 laboratory network the text "the audit team noted that in one of the county directorates visited one bovine suspected for BSE was not tested in accordance with relevant procedures (see section 5.4)".