ANNEX

Response of the Competent Authorities of Bulgaria to the recommendations of Report ref. DG(SANCO)/2012-6524-MR of an audit carried out from 26 to 30 November 2012 in order to evaluate the monitoring of residues and contaminants in live animals and animal products

N°.	Recommendation	Action Proposed by the Competent Authority
1	To ensure that the residue monitoring plan complies with requirements laid down in Articles 3 and 5 of Council Directive 96/23/EC and takes into account relevant data such as use of veterinary medicinal products in order to be based on risk as required by Article 3 (1) of Regulation (EC) No 882/2004.	CLVCE has taken into account the annual sales of veterinary medicinal products (VMP) provided by Control of VMPs Directorate, as in the preparation of the plan for 2013 for testing certain substances in certain animals, as well as in the plans for the development of new methods and extending the scope of existing ones for 2013 in order to establish the presence of substances from VMP.
2	To ensure that sampling is implemented in variable intervals spread over the whole year in line with the requirements of the Annex to Commission Decision 98/179/EC.	By Order № RD 11-1426/26.11.2012 of the BFSA Executive Director, is stipulated that in the first quarter of each year, until the approval of the National Monitoring Plan for Control on Residues (NMPCR) for the current year, the official control plan of residues of veterinary medicinal products to be implemented in accordance with the plan for the second quarter of the previous year. Thus, it is ensured that the sampling is implemented in variable time intervals spread over the whole year in accordance with the requirements of the Annex of Commission Decision 98/179/EC. Presently that Order (№ RD 11-1426/26.11.2012) is implemented by all official veterinarians and inspectors involved in sampling.
3	To ensure that the published residue monitoring plan does not specify the substances to be tested, so that the element of surprise in the checks performed is maintained in line with Annex III to Council Directive 96/23/EC.	NMPCR has been removed from the official website of the BFSA ensuring that the consumer has no access to its contents, respectively to the monitoring plan for VMP substances. With this action, we consider that we have provided the element of surprise of the inspections in accordance with Annex III to Council Directive 96/23/EC.
4	To ensure effective implementation and supervision of	In order to increase the efficiency of the VMP residues control, additions

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	implementation of the residue monitoring plan and to guarantee that for identified problems, corrective actions are taken as required by Article 8 (3) (b) of Regulation (EC) No 882/2004.	in points I, IX and X of Order № RD 11-1537/13.11.2011 are envisaged. The "Laboratory activities" Directorate (LAD) has the obligation to conduct verification of that particular Order every three months regarding the sampling and testing for the respective groups of substances on the basis of information provided by CLVCE and Regional Food Safety Directorates (RFSD).The Order will be modified as follows: - CLVCE shall promptly inform LAD within HQ of BFSA for the possibilities of Plan implementation; - RFSD shall sent to LAD information regarding the number of samples and number of tested samples for every substance and matrix. Information regarding the identified problems in the implementation of NMPCR will be promptly submitted to the respective deputy executive directors to take appropriate corrective action. With these actions, and the actions taken as a response to FVO recommendations No. 1 and 2, we consider that we have created the necessary conditions for effective implementation of the monitoring plan for the control of VMP residues of and contaminants
5	To ensure that a system for equine identification is put in place without delay in accordance with the provisions of Regulation (EC) No 504/2008.	The identification of equine in Bulgaria is carried out in accordance with Regulation (EC) No 504/2008. For more effective implementation of the Regulation, as of April 2013 the system for identification of equine will be changed. Until now, the identification was carried out by Municipal official veterinarians, and from April 2013 the identification will be performed by private practicing veterinarians. According to the Law on

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		Veterinary Activity (SG. 7 from 25.01.2013), every owner of animals is obliged to have an individual contract with private veterinarian, and both parties are obliged (according to the provisions of Law on Veterinary Activity and according to the contract provisions) to comply with the requirements of Regulation 504/2008. For the past 2012 training of private veterinarians was conducted on the territory of the whole country on the identification of equine. Also in the new Law on Veterinary Activity, the penalties for non-compliances related to animal identification have been significantly increased.
6	To ensure the provision of adequate laboratory capacity for the proper performance of residue analysis as required by Article 4 (2) (c) of Regulation (EC) No 882/2004.	For the testing of samples according to NMPCR for which there is no necessary laboratory capacity, BFSA organizes a procedure for selection of an external laboratory. By the end of 2012 the financial resources for the implementation of the signed by CLVCE contracts under public procurement for delivery of chemicals, consumables, reagents and spare parts, have been provided.