



Ministry of Food, Agriculture and Fisheries

Danish Veterinary and Food Administration

European Commission
Food and Veterinary Office
Attn. Michael Scannell
Grange, Dunsany,
Co. Meath,
Ireland

ANIMAL HEALTH DIVISION

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Remarks from Denmark to the draft report DG(SANCO) 2013-6756

Dear Director Scannell,

I hereby have the pleasure of forwarding comments from the Danish CA's on the draft report from the FVO audit 2013-6756 from 25 February to 01 March 2013 in order to evaluate the use of the TRACES system.

Attached in the e-mail is a word document with the DVFA's remarks to the recommendations given in the draft report.

4 BACKGROUND

Under the heading, Use of TRACES in Denmark during 2012, Section 3 it is stated that "In Denmark, there are ten LVUs who...".

Denmark officially has 3 LVU's dealing with animal health and animal welfare and 5 LVU's dealing with public health, but in the TRACES system, Denmark have 10 LVUs as this is a reflection of an earlier structure of the administration of DVFA. However the sections within the 3 and 5 units still reflects former 10 geographical areas. Therefore, for practical reason it was decided to keep the 10 LVUs in TRACES even if we on an administrative level are structured differently. Therefore, we suggest amending the beginning of Section 3 to: "In Denmark, there are ten LVUs in TRACES who..."

In the last section in part 4, please add after "via an export website" and before the full stop, ", (the Certificate Database)".

5 FINDINGS AND CONCLUSIONS

5.4 USE OF TRACES AT BIPS

Findings

As a comment to section 3: At the BIP in Aarhus, no CVEDs have been corrected by the BIP staff at all. All errors on the CVEDs are corrected by the person responsible for the load. Once the original CVED is received all corrections of CVED are carried out electronically, and the BIP staff prints out a corrected version of the CVED from TRACES.

As a comment to the third dot, second sub-dot, in the section of “The audit team noted that:”. The Competent authority finds the text to box 41 to be misleading and it should be amended.

The last dot in the section of “The audit team noted that: ” on the transshipment module, it should be noted that the information on the module was, when received from the TRACES team, forwarded to all receivers of the TRACES Newsletter. Furthermore, International Trade Division provided the information separately to the BIPs. However, this information was not perceived by the BIPs and since neither the TRACES co-ordination unit within the Animal Health Division nor International Trade Division followed up on the use of the new module, the module has not been used up till the time of the FVO audit team.

5.5 USE OF TRACES AT LVUS

Outgoing trade

1.- Live animals

In Section 2 – “the Eksportportalen (the Export Portal – Electronic booking system) will allows” should be changed to “the “Eksportportalen” (the Export Portal – Electronic booking system) which allows”.

2.- Products

In this section “...intra-certificates...” should be amended to “...commercial documents...”

Incoming trade

1.- Live animals

Sentence no 4 should be amended accordingly: “For instance, **the veterinary units** screen incoming messages for ungulates, except horses, as they need to be tagged with a red ear tag for facilitate certification to third countries.”.

In sentence no 5 (the last sentence of this section) “ungulates” should be amended to: “ungulates except horses”.

2.- Products

In section 1, in the first sentence “AHD” should be changed to “International Trade Division”.

In section 2, in the second and third sentence “intra-trade certificates” should be amended to “certificates and documents”.

Under The audit team noted that:, dot 3 please be informed that Denmark after the completion of the audit has filled in part 3 for the 2 mis-certified consignments and written to the authority of origin on the matter. However, the certificates have not yet been replaced by the authority of origin.

Conclusion on the use of TRACES by LVUs

There are so many notifications available in TRACES, and the managing of these are very time consuming as one will need to open every one of the certificates listed in the notification in order to see, if actions should be taken and if so, which actions. The DVFA hopes that the notifications in future are

changed in a way that will make it easier for the CA managing the incoming notification to make better risk assessments or that other managing or screening tools are made available, eg. ClickView available for all CA user and not only users with CCA profiles.

Kommentarer til den danske oversætter

Ud over bemærkninger til den engelske udgave, som også skal gennemføres i den danske version af rapporten, er der følgende bemærkninger:

Generelt

“Veterinærafdeling” rettes til “Veterinærenhed”.

”Kontor for Dyresundhed” rettes til ”Dyresundhed”.

”Kontoret for International Handel” rettes til ”International Handel”.

”Kontoret for Foder- og Fødevarerikkerhed” rettes til ”Foder- og Fødevarerikkerhed”.

”efteruddannelse” rettes til ”sidemandsoplæring”.

INDHOLDSFORTEGNELSE

Det mangler en reference til ”BILAG 1 – REGELHENVISNINGER”.

ANVENDTE FORKORTELSER OG DEFINITION I DENNE RAPPORT

Definitionen LVU skal rettes til følgende: ”LVU (Lokal veterinær enhed)”, da Danmark anvender samme forkortelse som på engelsk, altså LVU i omtalen af myndighedsorganisationerne i TRACES. Det er således forvirrende at oversætte LVU med Lokale veterinærafdelinger, da det dels retter fokus på FVST’s veterinære enheder, men LVU benævnelsen dækker over både fødevare- og veterinærenhederne i FVST’s struktur.

2 FORMÅL

I tabellen, række 3, kolonne 3, “Regional LVU” skal rettes til “SUPER LVU”, da Danmark bruger samme benævnelse for denne myndighedstype, som man anvender på engelsk.

4 BAGGRUND

Afsnit 2, linje 3 – “..., således den enkelte **toldmedarbejder** kan...” rettes til “..., således den enkelte **grænsedyrlæge eller officielle inspektør** kan...”.

Under overskriftet, Anvendelsen af TRACES i Danmark i 2012, afsnit 2, sidste sætning, bedes følgende “...,at lageret ikke benyttes til ulovlige sendinger i øjeblikket.” rettes til “..., at lageret i øjeblikket ikke benyttes til partier, der ikke opfylder importbetingelserne”.

5 RESULTATER OG KONKLUSIONER

5.1 KOMPETENTE MYNDIGHEDER

5.1.1 Udpegelse af kompetente myndigheder og koordinering mellem dem

Resultater

I 1. afsnit, efter linket til den danske landeprofil bør der indsættes et linjeskift, for at følge strukturen i engelske rapport.

I afsnit 3, efter "...det hurtige varslingsystem for fødevarer og foder" indsættes "...det hurtige varslingsystem for fødevarer og foder (RASFF)"

5.2 KONTROLRESSOURCER

5.2.3 Procedurer for udførelse og rapportering af kontrolaktiviteter

Resultater

I afsnit 5, rettes "Veterinærafdeling Syd" til "VeterinærSyd".

5.3 VERIFIKATION AF OG TILSYN MED DEN OFFENTLIGE KONTROL SAMT PROCEDURER

5.3.1 Verifikationsprocedurer

Resultater

I 2. dot under Auditholdets bemærkninger rettes "opsamlingscentrene" til "samlestederne".

5.4 GRÆNSEKONTROLSTEDERNES ANVENDELSE AF TRACES

Resultater

I afsnit 2, rettes ordet "kopifunktionen" til "kloningsfunktionen".

I afsnit 5, rettes "registrere resultater af laboratorieundersøgelser," til "registrere resultater af laboratorieanalyser i TRACES,".

I andet dot under Auditholdets bemærkninger rettes "en lang række mangler" til "flere mangler".

I tredje dot, første underdot under Auditholdets bemærkninger rettes "Den kompetente myndighed vidste ikke" til: "Den kompetente myndighed kunne ikke forklare".

5.5 DE LOKALE VETERINÆRAFDELINGERS ANVENDELSE AF TRACES

Resultater

Indførelse

2.- Produkter

I afsnit 2, første sætning ændres "Virksomheder til behandling af animalske biprodukter, der modtager..." til "Virksomheder, der håndterer animalske biprodukter, og som modtager..."

Under afsnittet - Auditholdet bemærkede følgende, første dot, anden sætning ændres ”flytning” til ”omsætning”.

Please do not hesitate to contact me if you have any questions or need clarification.

Yours faithfully,



John Larsen
Head of Division