



EUROPEAN COMMISSION  
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Directorate F - Food and Veterinary Office

DG(SANCO) 2014-7054 - MR FINAL

FINAL REPORT OF AN AUDIT

CARRIED OUT IN

IRELAND

FROM 21 TO 28 MAY 2014

IN ORDER TO EVALUATE THE EFFECTIVENESS OF, AND PROGRESS MADE BY THE PROGRAMMES CO-FINANCED BY THE EUROPEAN UNION TO ERADICATE BOVINE TUBERCULOSIS

*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 a footnote.*

### ***Executive Summary***

*The report describes the outcome of an audit carried out by the Food and Veterinary Office in Ireland from 21 to 28 May 2014.*

*The main objective of the audit was to evaluate the implementation of, and progress made by the programmes co-financed by the European Union to eradicate bovine tuberculosis.*

*Overall the report concludes that the programme is implemented and run as approved by the Commission and in compliance with the specific technical requirements of Union legislation.*

*While the programme has made clear progress during the past five years, it is still uncertain whether the currently applied measures are sufficient to reach the herd prevalence level required for a bovine tuberculosis free status. The recommendations of the recent report of the Task Force, still to be addressed by the competent authority and other expert opinions, clearly emphasise that additional measures are needed to achieve that final objective and to accelerate the bovine tuberculosis eradication process.*

*The audit team did not consider necessary to issue recommendations to the competent authorities in Ireland.*

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## ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

<b>Abbreviation</b>	<b>Explanation</b>
bTB	Bovine tuberculosis
CA(s)	Competent authority (ies)
CCA	Central competent authority
DAFM	Department of Agriculture, Food and the Marine
DVO	District Veterinary Office
ERAD	Eradication of Animal Diseases Division
EU	European Union
FVO	Food and Veterinary Office
High-risk breakdown	bTB breakdown where two or more reactors to the SICTT have been detected
IFN	Gamma-Interferon assay
<i>M. bovis</i>	<i>Mycobacterium bovis</i> , the causative bacterium of bovine tuberculosis
OTF status	Officially bovine tuberculosis free status
PAFF Committee	Standing Committee on Plants, Animals, Food and Feed - Section Animal Health and Welfare
Previous report	Report DG(SANCO) 2010-8408 – MR Final, of a mission carried out in Ireland from 3 to 11 November 2010 in order to evaluate the animal health controls in place in relation to bovine tuberculosis
Restricted herd	Herd with the officially bTB free status suspended or withdrawn
SANCO WD	Working Document on Eradication of bTB in the EU accepted by the bTB subgroup of the TF (SANCO/10067/2013)
SICTT	Single intra-dermal comparative tuberculin test
TF	Task Force for Monitoring Animal Disease Eradication
Singleton-reactor case	bTB breakdown where only one reactor to the SICTT is detected
The bTB handbook	Veterinary Handbook for Herd Management in the bTB eradication programme

## 1 INTRODUCTION

This audit took place in Ireland from 21 to 28 May 2014. The audit was undertaken as part of the planned audit programme of the FVO.

The audit team comprised two auditors from the FVO. The team was accompanied during the whole audit by representatives of the Department of Agriculture, Food and the Marine (DAFM), which is the central competent authority (CCA) within the scope of this audit.

An opening meeting was held on 21 May 2014 with the CCA and representatives of other competent authority (CA) involved in official controls in relation to bovine tuberculosis (bTB). At this meeting, the audit objectives and itinerary were confirmed, and additional information required for the satisfactory completion of the audit was requested.

## 2 OBJECTIVES

The audit assessed the operations related to the eradication of bTB. The objective was to evaluate whether the programmes for eradication of bTB have been implemented effectively and as approved for the periods from 1 January to 31 December 2013 (by Commission Implementing Decision 2012/761/EU) and from 1 January to 31 December 2014 (by Commission Implementing Decision 2013/722/EU).

In pursuit of the audit objectives, the following sites were visited and meetings held:

Meetings/visits		Comments
Competent authorities	6	Opening and closing (debriefing) meetings with the DAFM and representatives of other CA. Additional meetings with staff of the District Veterinary Offices visited (Kerry, Cork, Navan and Wexford).
Animal holdings	1	One cattle herd
Other stakeholders	2	One meeting with representatives of associations of Irish cattle farmers and of the Irish dairy and beef industries, and another meeting with staff of the Centre for Veterinary Epidemiology and Risk Analysis.

## 3 LEGAL BASIS

The audit will be carried out under the general provisions of European Union (EU) 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;
- Article 27(9) of Council Decision 2009/470/EC of 25 May 2009 on expenditure in the veterinary field, and
- Article 10 of Council Directive 77/391/EEC, introducing Community measures for the eradication of brucellosis, tuberculosis and leucosis in cattle.

Full legal references are provided in the Annex to this report. Legal acts quoted in this report refer, where applicable, to the last amended version.

## 4 BACKGROUND

### 4.1 PREVIOUS FVO AUDITS AND OTHER RELATED INFORMATION

Eradication programmes have been co-funded by the EU since 1977, when acceleration of eradication programmes was first set as an objective in Council Directive 77/391/EC. Criteria for the eradication plans were first established by Council Directive 78/52/EC and more recently, by Commission Decision 2008/341/EC. In 2014, a Commission Working Document on Guidelines for the Union co-funded programmes of eradication, controls and surveillance of animal diseases and zoonoses for the years 2015-2017 (Document SANCO/10181/2014), sets indicative minimum targets for 2015 and 2017 for the various programmes covered by this EU policy. This document can be found on the following website:

[http://ec.europa.eu/food/animal/diseases/docs/wd10181-2014-rev2\\_guidelines\\_for\\_union\\_cofunded\\_programmes.pdf](http://ec.europa.eu/food/animal/diseases/docs/wd10181-2014-rev2_guidelines_for_union_cofunded_programmes.pdf)

The FVO regularly audits the implementation of eradication programmes to evaluate their effectiveness and to assist the Commission services in deciding whether EU co-financing is justifiable or not. The most recent audit carried out by the FVO in Ireland in order to evaluate official animal health controls in the context of the bTB control and eradication programmes was carried out in November 2010 (ref. DG(SANCO) 2010-8408 – MR Final). The report of that audit (hereafter, the previous FVO report) and the current state of the FVO follow-up process can be found on the following websites:

[http://ec.europa.eu/food/fvo/index\\_en.cfm](http://ec.europa.eu/food/fvo/index_en.cfm); and

[http://ec.europa.eu/food/fvo/follow\\_up\\_en.cfm?co\\_id=IE](http://ec.europa.eu/food/fvo/follow_up_en.cfm?co_id=IE)

The TF is in charge of providing guidance for disease eradication to the Member States of the EU and assists the Commission in evaluating national eradication programmes. The TF held meetings in Ireland in November 2011 and in March 2014. During those meetings, the experts of the TF and the Commission received detailed information on all aspects related to the bTB control and eradication programmes in Ireland, while they provided expert advice to the CCA on how to improve the programme and accelerate the eradication of the disease. The reports of those TF meetings can be found on the following websites:

[http://ec.europa.eu/food/animal/diseases/docs/tb\\_report\\_ireland\\_2011\\_en.pdf](http://ec.europa.eu/food/animal/diseases/docs/tb_report_ireland_2011_en.pdf)

[http://ec.europa.eu/food/animal/diseases/docs/tb\\_subgroup\\_ireland\\_march2014\\_en.pdf](http://ec.europa.eu/food/animal/diseases/docs/tb_subgroup_ireland_march2014_en.pdf)

The outcome of those meetings was largely positive and their conclusions reflected the significant progress made by the Irish CA with implementation of the bTB eradication programmes. The TF issued recommendations to the CCA on both occasions. These recommendations are considered in the body of this report.

The Commission has issued in recent years a number of important documents in relation to the control, surveillance and eradication programmes for animal diseases which are co-funded by the EU. The following are of relevance in the context of evaluating the progress made with the implementation of bTB eradication programmes:

- A Working Document on Indicators for animal disease eradication, control and surveillance programmes published in 2012 (Document SANTE/12915/2012 Rev.2), which provides further guidance on indicators to be used in the context of bTB eradication and which can be found on the internet:

[http://ec.europa.eu/food/animal/diseases/docs/sanco-12915-2012\\_en.pdf](http://ec.europa.eu/food/animal/diseases/docs/sanco-12915-2012_en.pdf)

- A Working Document on Eradication of bTB in the EU published in 2013 and accepted by the TF (Document SANCO/10067/2013; hereafter SANCO WD). This document provides guidelines for the design and operation of bTB eradication and surveillance programmes, and also a basis for decision-makers to determine appropriate measures adapted to the local epidemiological situation of the disease in order to enhance the effectiveness and efficiency of those programmes. Those guidelines are fully taken into consideration by the TF during their evaluations and are the main pillars on which their conclusions are based. It can be found on the following website:

[http://ec.europa.eu/food/animal/diseases/eradication/tb\\_workingdoc2006\\_en.pdf](http://ec.europa.eu/food/animal/diseases/eradication/tb_workingdoc2006_en.pdf)

Comprehensive information on the general organisation of the Irish CA involved in management and implementation of the bTB eradication programme is provided in the previous audit report (see link above), the country profile for Ireland and in the Multiannual National Control Programme for the period 2012-2016, which are available on the following websites:

[http://ec.europa.eu/food/fvo/controlsystems\\_en.cfm?co\\_id=IE](http://ec.europa.eu/food/fvo/controlsystems_en.cfm?co_id=IE)

<http://www.agriculture.gov.ie/media/migration/publications/2012/MANCP20122016.pdf>

## 4.2 PROGRESS IN ERADICATING bTB

The 2014 approved programme for the eradication of bTB in Ireland provides further details on the organisation of the programme and can be found on the following website:

<http://www.agriculture.gov.ie/animalhealthwelfare/diseasecontrol/bovinetbbrucellosiseradicationchemes/diseaseeradicationtbbbrucellosis/>

Access to statistics on the implementation of the bTB eradication programme in Ireland for a number of years, including quarterly statistics since 2008, is available through the following website:

<http://www.agriculture.gov.ie/animalhealthwelfare/diseasecontrol/bovinetbbrucellosiseradicationchemes/statistics/tbstats/>

Ireland has kept the Commission and the MS informed of its bTB situation through presentations made to the Standing Committee on Plants, Animals, Food and Feed - Section Animal Health and Welfare (PAFF Committee). The Irish CA provided the latest updates at the PAFF Committee meetings held on 2 July 2013 and on 6 May 2014; all of these presentations can be found on the following website:

[http://ec.europa.eu/food/committees/regulatory/scfcah/animal\\_health/index\\_en.htm](http://ec.europa.eu/food/committees/regulatory/scfcah/animal_health/index_en.htm)

The situation before the current multi-annual (2011-2015) programme is illustrated in figure 1 below and summarised in a value-for-money evaluation carried out for the Irish government in 2008<sup>1</sup> and in the programme submitted to the Commission for 2011:

- “From that point (1965) forward, however, little further progress has been made in eradicating the disease, animal incidence remaining in or about 0.5%”.
- ”The animal disease incidence has fluctuated between 0.3% and 0.6% from 1965. During the period 2001 to date, the level of animal disease incidence has remained consistently below 0.5% dropping to 0.4 in 2009.”

<sup>1</sup> <http://www.agriculture.gov.ie/animalhealthwelfare/diseasecontrol/bovinetbbrucellosiseradicationchemes/valueformoneyandpolicyreviews/>

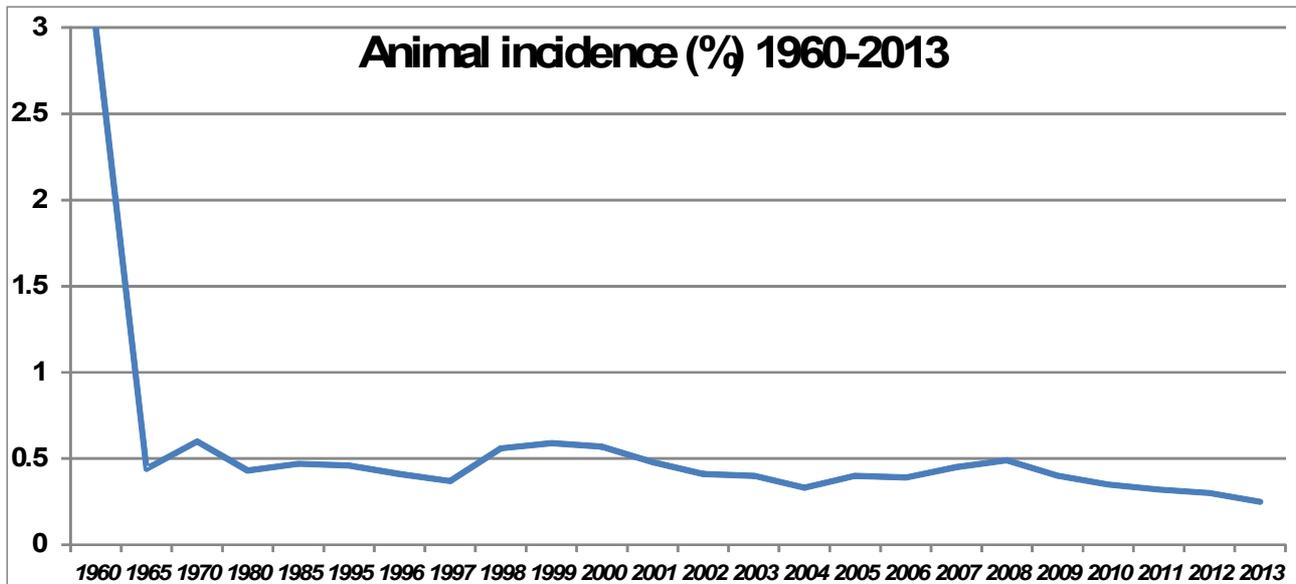


Figure 1: Animal Incidence (percentage of new reactor animals) in 1960-2013

Progress between 2009-2013 has been positive – and varies depending on which indicator is viewed: animal incidence shows 35% reduction, while herd prevalence has reduced 23% during the same time-period. Progress since the beginning of the current multi-annual programme (2011-2013) is 19% and 7% reduction of animal incidence and herd prevalence, respectively.

The main factors suggesting that this development actually indicates real progress in eradication are:

- a large proportion (>60%) of current bTB breakdowns are either so-called ‘singleton-reactor cases’; i.e. a bTB breakdown where only one reactor to the single intra-dermal comparative tuberculin test (SICTT) animal is detected – or cases where only one animal is detected at slaughterhouse and no further reactors are found in the holding of origin, and
- the average number of positive animals involved in a ‘high-risk breakdown’; i.e. a bTB breakdown where two or more reactors to the SICTT have been detected, has declined.

On the other hand, a number of factors give reason to interpret these data with caution:

- interim data for 2014 indicates that the overall progress has halted, which raises the question whether the decline during the past five years could be just part of a long-term cycle seen in figure 1, and
- the EU statutory final target of 0.1% herd prevalence that is a pre-requisite to consider the possibility of being granted the officially bTB free status (OTF status) for the Irish cattle herd is still far away (see figure 2 below) – and after reaching that target prevalence, this indicator would still need to be maintained at that level for six consecutive years in order to obtain that OTF status.

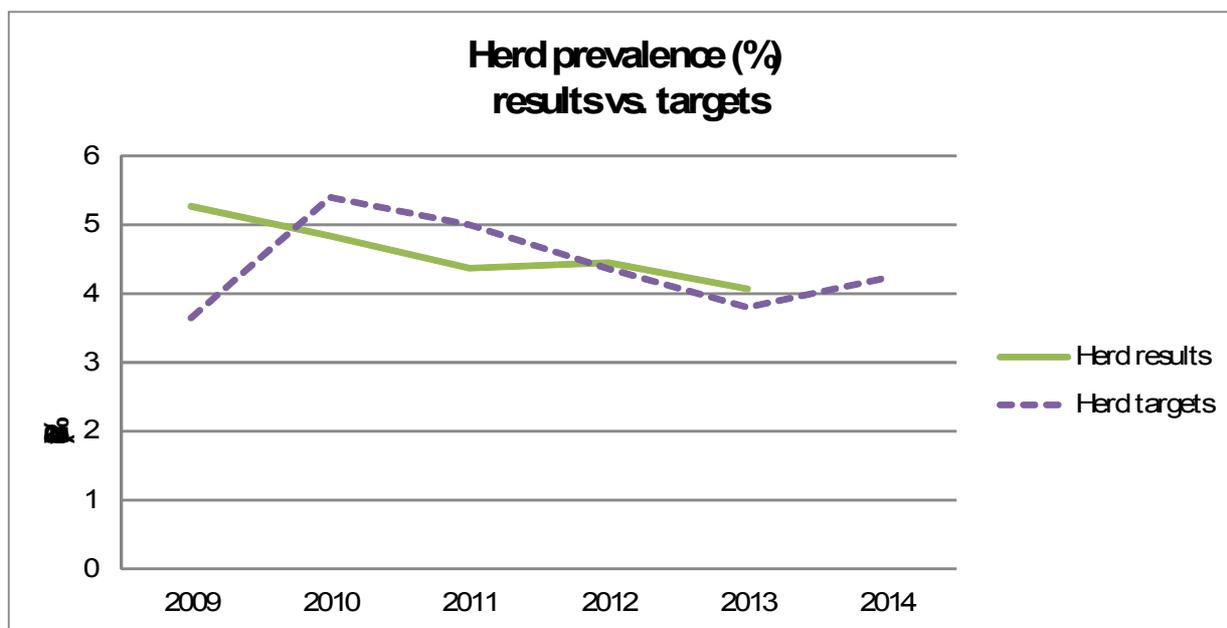


Figure 2: Herd prevalence (percentage of restricted herds) results and targets in 2009-2014

### 4.3 RECOMMENDATIONS FROM THE TASK FORCE

After a meeting held in Ireland from 5 to 6 March 2014, the Task Force for Monitoring Animal Disease Eradication (TF) recommended the CCA to implement some additional measures in order to accelerate the bTB eradication process. Satisfactory action has been taken in recent years to address the recommendation of the TF on movement controls, but due to the proximity of this audit to the issuing of some recommendations, the CCA did not have enough time to implement most of them. The audit team reviewed the current state of play in relation to those recommendations:

- *Use of Gamma-interferon assay (IFN):*

The TF recommended to the CCA that the combined use of the SICTT and the IFN should be further optimised to increase the detection rate of affected animals in herds where infection with bTB has been confirmed in order to accelerate elimination of residual infection.

According to the approved programmes, the use of IFN has gradually increased in recent years and provisions for its use are described in detail in the Veterinary Handbook for Herd Management in the bTB eradication programme (hereafter, the bTB handbook). Herds involved in high-risk breakdowns are the primary target for the use of the IFN. In most cases, a veterinary inspector carries out a field epidemiological investigation in these herds, which may contribute to identifying animals to be sampled and tested with the IFN. The decision on whether to use IFN or not was in many cases justified by practical rather than epidemiological grounds, such as:

- convenience for the herd keeper – or in some cases, disagreement by the keeper;
- availability of staff for the field sampling;
- long distance from the laboratory, which prevented performing the test within the eight hours required to maximise its sensitivity.

In some examples seen, animals that were excluded from the initial IFN turned out to be reactors to the SICTT in the following test or to the IFN done in response to the former.

According to representatives of the Eradication of Animal Diseases Division (ERAD), the main

problem in using the IFN is the opposition of the farming community. This is due, in their view, to the fact that animals positive to IFN have to be culled although there is uncertainty of whether animals with positive test results are really infected with bTB. As a result, optimising the use of the IFN in order to accelerate elimination of bTB residual infection; i.e. to prioritise the added sensitivity (and accelerated intensive testing) it may bring to bTB diagnosis at herd level despite the possible occurrence of some false positive results, as recommended by the Task Force for Monitoring Animal Disease Eradication (TF), is not yet a priority for the CCA.

- Use of bacteriological culture and molecular typing:

The TF recommended to the CCA further consider to extend the use of bacteriological culture and molecular sub-typing diagnostic tools to substantiate the conclusions of the epidemiological investigations on the causes of the bTB infection detected, in particular when the involvement of wildlife is assumed to be the main source of infection in the geographical area under study.

Usually, in case of a bTB breakdown, for confirmation of the presence of *M. bovis*, the initial diagnostic steps concentrate on histopathological examination of tissues. That, if conclusive, is sufficient to confirm the breakdown and closes the bTB diagnostic pathway. Inconclusive or negative histopathological examinations are always cultured. According to representatives of the national reference laboratory for bTB diagnosis:

- In most cases where a bTB breakdown has been confirmed, this has been as a result of a positive histopathological examination and bacteriological culture has not been carried out to try to isolate *M. bovis*.
- *M. bovis* has been isolated from 5% of inconclusive and 6.6% of negative histopathological cases.

Molecular analysis is only done sporadically to sub-type and characterise the genotype involved in bTB breakdowns.

- Biosecurity measures:

The TF recommended integrating biosecurity measures to future policy on bTB control and that it be advised based on the research performed to further ascertain the risk of bTB transmission from wildlife to cattle at local level.

Although bTB infection is widespread throughout Ireland, the data from the Animal Health Computer System showed that there were certain local areas and herds where bTB infection was recurrently detected for a number of years. No other analysis beyond the presence of infected badgers had been carried out at that level to pinpoint the origin of the problem and manage the risks related to the local cycle of transmission of the disease.

The audit team saw limited initiatives aimed at promoting biosecurity and herd health management measures intended to curtail transmission and persistence of bTB. Leaflets recently updated by the DAFM provided general guidance in that respect and were available to the farming community. However, promotion of biosecurity measures was not, at the time of the audit, an integral part of the bTB eradication policy as a fundamental pillar for the prevention of bTB (re-)infection in cattle herds. The feedback from the Superintending Veterinary Inspectors and veterinary inspectors met indicated that most farmers were very sceptical about the benefits of intensifying preventive measures for bTB, in particular in relation to badgers. They indicated that farmers are more proactive with application of biosecurity and preventive measures targeted to other infectious diseases with more direct impact on the health of their animals.

Regarding epidemiological investigations on high-risk breakdowns the TF acknowledged in its report that while different bTB risk levels can be identified amongst subsets of animals in a restricted herd, the concept of a unique epidemiological unit should prevail and the same testing

regime should be used on all animals in the epidemiological unit before further risk management decisions can be adapted to particular subsets during the herd de-restriction process. The audit team observed that quite often, veterinary inspectors still identified different bTB risk levels amongst various groups of animals in the same herd. There were examples of bTB breakdowns where that risk profiling, the different bTB testing regimes used on different groups of animals, after all of them had gone through an initial SICTT, and the separation of the animals in groups in order to apply different de-restriction policies and speeds; did not have records or epidemiological information on file to justify such differences<sup>2</sup>.

- Depopulation of infected herds:

The TF recommended to the CCA that, “the criteria for depopulation should be considered, so as to ensure that this tool is used to its full potential, whenever a control benefit could be derived from it”.

In relation to partial or total depopulation of infected herds, decision-making criteria used by the DVOs are based on the general guidance provided in the approved programme and in consultation with staff of the ERAD. These criteria are still largely modulated by the high cost of the compensation to be paid in many cases, by the opposition of the stakeholders to those options, and by the perception that, since the infection is maintained by wildlife, eliminating cattle from one herd, just to bring another group of susceptible animals to re-populate that herd later on, does not contribute to the elimination of bTB from the area<sup>3</sup>.

In practice, partial depopulation has been used mostly in herds where the use of the IFN allows the detection of early stages of infection in a number of cattle that had showed negative results to the SICTT. In a few cases, application of this policy alongside badger culling at local level have been effective in eliminating bTB breakdowns in the partially de-populated herds (i.e. no breakdowns after a number of years).

- Movement controls:

The TF recommended to the CCA that special derogations permitting, under certain conditions, movements into and out of restricted herds should be revised and enforced effectively to ensure that this is only allowed for herds where all animals are destined for slaughter. This had already been a recommendation of the TF meeting held in 2011.

Data provided by the DAFM on the use of these special derogations during recent years showed that their number have stabilised and even slightly decreased. The audit team observed that rules and controls on movements from and to restricted herds were strictly enforced, in particular specific rules and controls on fattening units with a non-OTF status (i.e. feedlots).

- Risk-based pre-movement testing:

The TF stressed that even though the general use of pre-movement testing is not recommended as it may provide a false sense of security without giving enough additional reduction of the risk; consideration should be given to the introduction of a risk-based pre-movement testing regime to further prevent transmission of bTB from high-risk herds/areas to long-standing OTF herds.

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2 *In their comments to the draft report the CA noted that they intend to adjust the internal processes to ensure that records and relevant information are recorded to justify the deployment of additional focussed measures on some but not other groups within a herd.*

3 *In their comments to the draft report the CA clarified the policy followed in relation to total depopulation of infected herds emphasising that when the evaluation of the situation shows that its long-term positive impact, including the possibility that the herd will stay clear of re-infection from the local area, is evident; that is the option chosen. Nonetheless, they stressed the fact that when the combination of other breakdown management measures, mainly the use of IFN to gradually clear the infected herd, combined with other local area management measures, leads to believe that killing of all the animals in the infected herd can be avoided; total depopulation is initially excluded.*

Pre-movement testing has not been applied since 1996. Discussions on the potential benefits of implementing selective risk-based pre/post-movement testing were still ongoing at the time of this audit.

## 5 FINDINGS AND CONCLUSIONS

### 5.1 IMPLEMENTATION OF THE CURRENT PROGRAMME

#### *Legal requirements*

Commission Implementing Decisions 2012/761/EU and 2013/722/EU (approval of the eradication programmes).

Council Directive 64/432/EEC (general and specific measures on bTB).

Council Directive 77/391/EEC (specific measures on bTB eradication programmes).

#### *Findings*

Overall, evidence showed that the programme was implemented according to the plan approved by the Commission and in compliance with EU requirements:

- Measures applied in case of detection of bTB in a cattle herd have not changed significantly and the description in the previous FVO report still applies. For instance, the use of the strict interpretation of the SICTT, increasing its sensitivity and aimed at detecting as many potential infected animals as possible in a restricted herd (i.e. a herd with its OTF status suspended or withdrawn), in particular in case of recurrent infection, was applied in a consistent and effective manner.
- No significant change was seen with regard to the epidemiological investigations during bTB breakdowns, in comparison to the description included in the previous report. Detailed field investigations are only carried out in high-risk breakdowns. According to data provided by the DAFM, epidemiological investigations are though carried out in all breakdowns, and almost 98% of the high-risk breakdowns receive a field visit. Veterinary inspectors sometimes delegate that task to technicians who do not always draw a sufficiently comprehensive picture of the epidemiological situation, in particular with regard to the bTB risk implications for the local area beyond the investigated herd.
- The cases reviewed by the audit team regarding the de-restriction process of herds had followed the protocols described in the approved programme, both in respect of time-intervals and to adaptation of a more intensive targeted follow-up to those cases with recurrent infection.
- The policy of selective culling of badgers applied at local level in areas where bTB breakdowns are confirmed has not changed much since the previous report. According to data provided by the DAFM, the percentage of badgers with positive bacteriological results has decreased significantly since 2007. However, the downward trend has stopped, with a slight increase in 2013. According to representatives of the DAFM, controlled culling will not be sufficient to reduce the transmission of bTB further within the badger population and eradicate infection from that population. They consider that an effective vaccination programme is necessary for that goal to be achieved.

- All layers of the official control system have access to excellent information management tools and databases that facilitate performance of their tasks, as well as their regular supervision and verification. The integration of the Animal Health Computer System with the Animal Identification and Movement database facilitates the forward and backward tracing of animal movements when bTB is detected in a herd. It also allows private practitioners performing bTB testing to avail of the most up-to-date animal census and to ask the animal keeper to update the herd profile in the Animal Identification and Movement database when they find discrepancies between the data in the system and their observations in the field.
- Measures laid down in the eradication programme targeting bTB breakdowns affecting fragmented herds, including definition and investigation of high-risk contiguous herds, were applied largely as described in the approved programme, in particular with regard to intensified bTB testing and movement restrictions.
- Experienced staff at central level in the ERAD regularly provide advice to staff of the District Veterinary Office (DVOs), in order to better tailor bTB control measures in the field. The high number of bTB breakdowns detected, often does not give central staff the opportunity to evaluate in depth the diverse epidemiological situations found at local level, and this has to be carried out by staff of the DVOs. DVO staff usually do not analyse the local situation beyond the standard application of control measures on the restricted herd and the targeted contiguous herds.

### *Conclusion*

The programme has been implemented as approved by the Commission and in compliance with relevant legal requirements.

## **5.2 VERIFICATION OF EFFECTIVENESS OF THE IMPLEMENTATION**

### *Legal requirements*

Articles 4(6) and 8(3) of Regulation (EC) No 882/2004.

### *Findings*

Staff of the ERAD reviews – at monthly meetings – the implementation of bTB control measures carried out by the DVOs. During those meetings, specific problems are thoroughly discussed in order to follow them up, adapt or update instructions to the evolving epidemiological situation, and provide advice to the relevant Superintending Veterinary Inspectors. Evidence of feedback received by the DVOs visited was seen by the audit team for topics such as the evaluation of performance of practitioners, advice on checks on herds contiguous to high-risk breakdowns and recommendations on the approach to deal with herds with delayed bTB annual testing. During these meetings, other issues such as market valuation of reactor animals to be slaughtered and the compensation levels applied in the different parts of the country were also discussed.

The ERAD put in place a comprehensive quality control system to directly supervise and indirectly verify the effective implementation of the SICTT by private practitioners. There was a lot of evidence to confirm that this system has been enhanced further since the previous FVO audit. The performance indicators obtained regularly from the Animal Health Computer System provide evidence that the majority of private practitioners have considerably improved their performance and the reliability of the results they obtain with the application of the SICTT. The direct supervision carried out by DVOs has contributed to increase the levels of training and expertise

mainly amongst younger, less experienced or worst-performing private practitioners. There were examples where the authorisation to carry out the official SICTT within the bTB eradication programme has been withdrawn for a number of practitioners as a result of low performance indicators and the corroboration of their bad performance in the field.

The two Senior Superintending Veterinary Inspectors responsible for verifying the implementation of the bTB eradication programme by the DVOs have intensified their activities since 2013. Many of their planned activities are targeted after the analysis carried out during the ERAD meetings mentioned above. Sufficient evidence was available of these activities in all DVOs visited and a very good selection of performance indicators has been made in order to ensure that all components of the bTB eradication programme operate effectively all over the country.

The Internal Audit Group of the State Veterinary Service of the DAFM has carried out five audits in total on this area since 2008. The audits covered verification of the general implementation of the programme (2008), targeted verification of a number of specific measures, such as the quality control of the SICTT (2009), controls on cattle dealers and restricted feedlots (2010 and 2013), and measures focused in wildlife controls (2011).

### *Conclusions*

The use of both targeted audits by the Internal Audit Group and newly introduced verification activities of official bTB controls (by Superintending Veterinary Inspectors) provide for the verification of effective implementation required by Articles 4(6) and 8(3) of Regulation (EC) No 882/2004.

## **6 OVERALL CONCLUSIONS**

The programme is implemented and run as approved by the Commission and in compliance with the specific technical requirements of EU legislation.

While the programme has made clear progress during the past five years, it is still uncertain whether the currently applied measures are sufficient to reach the herd prevalence level required for a bTB free status. The recommendations of the recent report of the TF, still to be addressed by the CA, and other expert opinions, clearly emphasise that additional measures are needed to achieve that final objective and to accelerate the bTB eradication process.

## **7 CLOSING MEETING**

A closing meeting was held on 28 May 2014 with representatives of the DAFM and other CA involved in official controls on bTB. At this meeting, the main findings and preliminary conclusions of the audit were presented by the audit team. The representatives of the CA did not express disagreement with the findings and conclusions presented, they provided additional clarification on a number of issues and undertook to give due consideration to the points raised by the audit team.

## **8 RECOMMENDATIONS**

The audit team did not consider necessary to issue recommendations to the CAs in Ireland.

## ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
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
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. 2009/470/EC	OJ L 155, 18.6.2009, p. 30-45	2009/470/EC: Council Decision of 25 May 2009 on expenditure in the veterinary field (Codified version)
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. 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
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
Dec. 2012/761/EU	OJ L336, 8.12.2012, p.83-93	2012/761/EU: Commission Implementing Decision of 30 November 2012 approving annual and multiannual programmes and the financial contribution from the Union for the eradication, control and monitoring of certain animal diseases and zoonoses presented by the Member States for 2013

<b>Legal Reference</b>	<b>Official Journal</b>	<b>Title</b>
Dec. 2013/722/EU	OJ L 328, 7.12.2013, p. 101-117	2013/722/EU: Commission Implementing Decision of 29 November 2013 approving annual and multiannual programmes and the financial contribution from the Union for the eradication, control and monitoring of certain animal diseases and zoonoses presented by the Member States for 2014 and the following years