EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis

DG(SANTE) 2016-8762 - MR

FINAL REPORT OF AN AUDIT
CARRIED OUT IN
POLAND
FROM 11 APRIL 2016 TO 15 APRIL 2016
IN ORDER TO
EVALUATE THE MEASURES TO ENSURE THE WELFARE OF CATTLE ON DAIRY FARMS

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 in Poland from 11 to 15 April 2016 as part of the published DG Health and Food Safety audit programme.

The objective of the audit was to evaluate the suitability and effectiveness of the measures in place to ensure that cattle on dairy farms are not caused any unnecessary pain, suffering or injury.

The report concludes that the measures in place do ensure that cattle on dairy farms are not caused unnecessary pain, suffering or injury. However, the limited use made of animal based welfare indicators, together with weaknesses to ensure a systematic and harmonised assessment of those indicators – such as nutritional status, reproductive diseases and lameness – reduce the potential for detection of animal welfare issues.

Public, semi-public, private entities or associations, and research bodies have some involvement and positive impact on the welfare of cattle. As the overall coordination and steer of the activities undertaken is limited, their potential impact and effectiveness is modest.

The report makes no recommendations to the Polish authorities.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	**Explanation**
ARMA	Agency for Restructuring and Modernisation of Agriculture (*Agencji Restrukturyzacji i Modernizacji Rolnictwa*)
EU	European Union
GVI	General Veterinary Inspectorate (*Glówny Inspectorat Weterynarii*)
PVI	Poviat (District) Veterinary Inspectorate

1 INTRODUCTION

This audit took place in Poland from 11 to 15 April 2016 as part of the planned audit programme of DG Health and Food Safety. An opening meeting was held with the Polish competent authorities on 11 April 2016. At this meeting, the objectives of, and itinerary for, the audit were confirmed by the audit team and additional information required for the satisfactory completion of the audit was requested.

The audit team comprised two auditors from DG Health and Food Safety and a national expert from Denmark and was accompanied throughout the audit by representatives from the Central Competent Authority the General Veterinary Inspectorate (GVI, *Glówny Inspectorat Weterynarii*).

2 OBJECTIVES AND SCOPE

The objective of the audit was to evaluate the suitability and effectiveness of the measures in place to ensure that cattle on dairy farms are not caused any unnecessary pain, suffering or injury.

In particular the audit tried to identify what factors influence the steps[1] taken by dairy farmers to minimise the occurrence of mastitis, lameness, injuries, reproductive and metabolic diseases and disease in calves.

The scope of the audit included:

- Welfare conditions of dairy cows and calves; calves are included in relation to the prevention and treatment of disease and any mutilations which are carried out. For dairy cows the audit focused on the factors which contribute to prevention and treatment of mastitis, lameness, reproductive and metabolic diseases. These factors might include buildings, equipment, land, biosecurity, health management, etc.
- National policy on animal welfare on dairy farms.
- National legislation and measures such as cross-compliance.
- Official controls on dairy farms and their outcomes.
- Other measurements of animal welfare outcomes (e.g. lameness scores, body condition scores, somatic cell count, longevity).
- Dissemination of information on husbandry systems and information on the impact of change from applied research, economic studies.
- The ability, knowledge and competence of dairy farmers, and measures that influence their husbandry practices.
- Mechanisms for supporting change to husbandry systems (e.g. funding, communication, training and education).
- Involvement of the dairy industry in the above issues (e.g. dairy processors, milk purchasers or farmer co-operatives).

[1] In order to interpret that owners or keepers of cattle on dairy farms take “all reasonable steps”, specific articles from Council of Europe recommendation concerning cattle are included in the criteria for the audit.

- Market led initiatives which promote animal welfare (voluntary schemes).
- Involvement of advisory services such as farm advisory or private veterinary groups.
- The audit concentrated on the period 2013 – April 2016.

In addition to the scope, information was collected on the prudent use of antimicrobials in dairy farms (see Annex II).

The main legal requirements are included in:

- Council Directive 98/58/EC concerning the protection of animals kept for farming purposes;

- Commission Decision 2006/778/EC concerning minimum requirements for the collection of information during the inspections of production sites on which certain animals are kept for farming purposes;

- Council of Europe recommendation concerning cattle of 21 October 1988 [2] (hereafter "the Recommendation"), and in particular those provisions which relate to:
    a. Inspection of animals for good health and where there are signs of ill health the taking of steps to establish the cause and take remedial actions (Article 3 and 4 of the Recommendation);
    b. Maintenance of good conditions of hygiene, limiting the risk of disease or traumatic injuries, and provision of accommodation which allows animals room to lie down, to rest and to rise (Article 6 and Appendix B of the Recommendation);
    c. Seeking advice on welfare aspects when new buildings are to be constructed or existing buildings modified (Article 7 of the Recommendation);
    d. Following of certain procedures when mutilations are carried out (Article 17 of the Recommendation).

- Council Directive 2008/119/EC lays down minimum standards for the protection of calves. However, the scope of the audit was limited to the provisions laid down in paragraphs 6 and 15 of Annex I to the Directive regarding:
    a. inspections of calves;
    b. treatment where a calf appears to be ill or injured;
    c. obtaining veterinary advice for any calf which is not responding to the stock-keeper's care;
    d. providing bovine colostrum to each calf as soon as possible after it is born.
- 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.

In pursuit of the objectives, the following meetings were held:

[2] http://www.coe.int/t/e/legal_affairs/legal_co-operation/biological_safety_and_use_of_animals/farming/Rec%20cattle%20E.asp

Meetings with Competent Authorities			Comments
Competent authority	Central	2	Opening and closing meeting
	Other	2	With province and district level officials from the Mazowieckie and Lodzkie provinces
Site visits			
Dairy farms		2	Dairy cattle farms, one with the number of dairy cattle in the 20 to 50 range and the other in the range of 50 to 150.
Meetings with representatives of other main actors involved with the welfare of dairy cattle		2	- Polish Federation of Cattle Breeders and Dairy Farmers - National Association of Dairy Cooperatives - Warsaw University of Life Sciences - Polish Chamber of Milk
Meeting with dairy farmers		1	Five farmers with dairy cattle numbers in the ranges of 10 to 150.

3 LEGAL BASIS

The audit was carried out under the general provisions of 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.

EU legal acts quoted in this report are provided in Annex I and refer, where applicable, to the last amended version.

4 BACKGROUND

EU animal welfare rules for dairy cattle stem from Council Directive 98/58/EC which provides general requirements for animal welfare in all farmed species. These rules are based on the 1978 European Convention for the Protection of Animals kept for Farming Purposes drawn up within the Council of Europe[3]. Pursuant to Article 9 of the European Convention, in 1988 the Council of Europe adopted a Recommendation Concerning Cattle which has subsequently become part of EU law. Furthermore since 2003, the reform of the Common Agriculture Policy has introduced the concept of cross-compliance. In this framework direct payments to farmers will be granted only if farmers comply with certain animal welfare rules[4].

In April 2015 – 30 years after they were established – the EU removed quotas for milk production. The EU milk quota system was set up in 1985 after subsidised European milk production persistently outstripped consumer demand. Under the milk quota system Member States were penalised if they produced too much milk. Different studies indicated that the

[3] The EU approved this Convention by Decision 78/923/EEC (OJ L 323, 17.11.1978, p. 12)
[4] Council Regulation (EC) No 1782/2003 (OJ L 270, 21.10.2003, p. 1)

ending of the milk quota system would lead to an increased concentration of milk production in Northern European countries.

The abolition of quotas was also expected to trigger further changes in the sector, including the attitude of farmers to size of farms, land intensification and/or size of herds.

One of the aims of the abolition of quotas is to increase efficiency through economies of scale in milk production. This could, amongst other possibilities, be through structural changes such as increased herd size, intensified land use and entrance of new producers into the sector. This could have either a negative or positive impact on the implementation of animal welfare rules – depending on how this transition is managed.

On this last point, DG Health and Food Safety planned for its 2016 programme, a series of audits aimed to identify activities that are suitable and effective in ensuring that cattle on dairy farms are not caused any unnecessary pain, suffering or injury. In this regard competent authorities were invited to identify other parties, both public and private, whose activities contribute to the audit objective, for inclusion in this audit. This series also attempts to identify any good or best practices for prevention, treatment and control of diseases. The audits will be also used to collect information on the prudent use of antibiotics particularly in relation to the relevant points from the guidelines for the prudent use of antimicrobials in veterinary medicine (2015/C 299/04)[5].

Poland is the 5th biggest EU milk producer by volume and has approximately 2 250 000 dairy cows. The GVI informed the audit team that there are approximately 373 000 dairy farms and that both the number of cows and farms have decreased in recent years but average herd size has increased. The large majority of dairy farms are relatively small and in two ranges of number of dairy cows, between 10 to 19 and 20 to 49 cows, the large majority of dairy cows are also in farms in two ranges of number of dairy cows, the between 20 to 49 and 50 to 149 ranges.

The Polish Federation of Cattle Breeders and Dairy Farmers (*Polska Federacja Hodowców Bydła i Producentów Mleka*) informed the audit team that in 2015 approximately 36% of the dairy cows in Poland are registered in the centralised programme of genetic selection and milk production performance evaluation. These animals (average herd size reported to be 36 cows) have an average annual milk yield of around 7 770 kg and the average annual milk yield for dairy cows outside of this programme is at around 5 840 kg.

5 FINDINGS AND CONCLUSIONS

5.1 MAIN ACTORS INVOLVED WITH THE WELFARE OF DAIRY CATTLE

1. The organisation of the GVI is described in detail in the report DG SANCO 2014-7013 of the "Country Profile" of Poland, including the control systems of relevance for animal

[5] Commission guidelines for the prudent use of antimicrobials in veterinary medicine (OJ C 299, 11.9.2015, p.7) http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1450453756494&uri=CELEX:52015XC0911%2801%29

welfare at farm, and which is accessible at:
http://ec.europa.eu/food/fvo/country_profiles_en.cfm

2. There is no specific national policy on welfare of dairy cattle; the GVI covers it within the national farm animal welfare checks for cattle and calves (see also paragraphs 9 to 13).
3. The Agency for Restructuring and Modernisation of Agriculture (ARMA) is responsible for cross compliance inspections and the respective direct payments and/or deductions, which include animal welfare requirements (Regulation (EC) No 1782/2003). The animal welfare part of those inspections is performed by the GVI (see also paragraphs number 14 and 19).
4. The Department of Rural Development of the Ministry of Agriculture indicated that under Rural Development Funds, for 2014-2020 there are two types of grants available for dairy farmers that contribute to the welfare of cattle on dairy farms:
   - one for modernising agricultural holdings, namely livestock buildings, available from November 2016 to farms of at least 300 hectares;
   - another for restructuring small farms, expected to be available from the first quarter of 2017.

5. The Polish Federation of Cattle Breeders and Dairy Farmers developed a selection index (Index PF - Production and Functionality) to identify the desirable animals (applied to the Holstein breed) to be used for breeding. The current index includes the following overall parameters and percentage weights: productivity 40% (milk yield of fat + 2x yield of protein), conformation 25% (parameters related to rump, chest, udder, legs and feet), fertility 15%, somatic cell count 10% and longevity 10%. Longevity was the most recent change, in 2014, to the selection index and it was added by reducing the weight of the productivity parameter from 50% to 40%. In addition to the use of the selection index these Federation of breeders:
   - provides advisory services for dairy cattle breeding, milk production evaluation, and nutrition. Approximately 21 000 dairy cattle farms -with 36% of the dairy cattle in Poland- are registered for the breeding and milk production evaluation service;
   - publishes a breeders magazine, brochures on some subjects of relevance for dairy cattle welfare as well as the book "Cow Signals: A practical guide for dairy farm management".

6. Other actors include dairy processors, cooperatives, and associations, as well as the Polish Chamber of Milk which congregates many of those processors and, also producers' associations. Different cooperatives and processors, or processors associations, take different approaches concerning the support provided to dairy farmers:
   - all buyers of raw milk perform regular testing of herd milk quality and composition (e.g. total plate count, somatic cell count, protein and fat content);
   - another type of support frequently available is via the provision of farm advisory services (similar to the Federation of Cattle Breeders and Dairy Farmers but without

the same emphasis on breeding selection), training, and preferential loans to modernise facilities and equipment.

7. The Warsaw University of Life Sciences, in cooperation with the National Veterinary Institute and a dairy cooperative, carried out a research project entitled "Healthy Cow", aiming at improving economic efficiency of dairy farms through counseling and training on genetic improvement, health, welfare and nutrition of dairy cows, production technology and the economics of dairy farming.
   - The project included data gathered between 2008 and 2015 from up to 69 participating farms and approximately 7 000 cows. This data showed a very significant increase in milk yield per cow. It showed also a high culling rate (33%/year) and that only ~10% of the cows had been provided with feed correctly formulated, and/or placed under proper environmental conditions and management to allow such a high milk yield without causing some level of malnourishment;
   - The project developed a dairy farm production model that will be made freely available for implementation by other dairy farmers. The University believes that the model is valid for approximately 90% of the Polish dairy farms.

5.2 ASSURANCES FROM COMPETENT AUTHORITY ACTIVITIES ON FARMERS' COMPLIANCE WITH LEGAL REQUIREMENTS

Legal requirements

Directive 98/58/EC.

Commission Decision 2006/778/EC.

Articles 3, 4, 6, 7, 17 and Appendix B of the Council of Europe Recommendation Concerning Cattle.

Paragraphs 6 and 15 of Annex I to Directive 2008/119/EC.

Regulation (EC) No 882/2004.

Findings

8. National legislation on animal welfare is found under the Animal Protection Act of 21 August 1997. In particular, legislation regulating the welfare of cattle of dairy farms is found in:
   - the Regulation of the Minister for Agriculture and Rural Development of 28 June 2010 concerning the minimum conditions for keeping livestock species other than those for which protection standards have been laid down in European Union legislation;
   - the Regulation of the Minister for Agriculture and Rural Development of 15 February 2010 on requirements and procedures applicable to the rearing of farm animal species for which protection standards have been laid down in European Union legislation.

9. Documented procedures are available for planning and carrying out official controls on animal welfare in dairy farms, as required by Art. 8 of Reg. 882/2004. These procedures are included in the Chief Veterinary Officer's instruction (GIW pr. 02010-1/2015 of February 2015) which covers official controls on the welfare at farm of all animal species.
10. This instruction includes the relevant points from Directives 98/58 and 2008/119, and the Recommendation (e.g. it was updated in February 2015 to include the requirement for the provision of sufficient quantities of iron in feed (Point 11 of Annex I of Dir. 2008/119)- for welfare of calves). It includes sections for the welfare of calves and the welfare of (adult) cattle, without distinctions between production types (beef or dairy), but does adequately refer to differences related to particular housing methods (tethering, loose stalls, grazing, etc.).
11. The instruction provides an exhaustive description on the minimum requirements of resource-based measurements (stall dimensions and surface area depending on the weight and category of the animal, environmental parameters, etc.) and relevant enforcement actions to take depending on the type of non-compliance detected; It also refers to animal-based indicators that should be taken into account (hoof condition and lameness, nutritional status of the animal, condition of the udder and the skin) when describing what controls should be carried out regarding the health status of the animals but has no indications on how inspectors should assess (or of possible reference guidance to use for assessing) herd lameness and body condition (e.g. what should be the body condition of an adequately nourished dairy cow at the different stages in its production cycle).
12. There are dedicated checklists annexed to the instruction, including checklists for general farm animal welfare requirements (Dir. 98/58), for calf welfare requirements (Dir. 2008/119) and for additional welfare requirements for cattle (based on national requirements mainly on stall dimensions).
13. In line with Art. 6 of Directive 98/58, the instruction requires each Poviat (District) Veterinary Inspectorate (PVI) to carry out controls on 5% of cattle farms annually. The instruction indicates:
    - 50% of farms should be selected using risk-assessment criteria, e.g results of previous inspections, non-compliances (including where milk collection has been suspended due to raw milk non-compliances), size of the herd (larger herds may have higher non-compliances due to stocking density and management difficulties), sudden changes in herd size, change of ownership, and (increased) number of fallen animals;
    - other 50% of farms should be selected randomly.

14. Planning and organisation of official animal welfare controls is in line with the requirements of Art. 3(1) of Reg. 882/2004. In the PVIs visited, the "other 50% of farms" were initially selected using also risk criteria to create an extended list (e.g. with all farms not inspected in recent years for welfare controls, farms with less than 10 cows as more of them are not included in any advisory service or receiving the single farm payment) and then choosing randomly amongst these the specific farms to be visited.

The audit team was informed that in addition to these checks, additional welfare controls are carried out when a PVI is made aware of possible non-compliances (from inspections on farm for other purposes, notifications from dairy establishments of somatic cell counts exceeding the legal limit, complaints) and to farms that apply for grants to modernise their facilities.

15. The GVI carries out all animal welfare controls including those reported under ARMA. The PVIs visited indicated that ARMA provides each PVI with a list of all cattle farms present in their district. This list also indicates which farms are enrolled in the single farm payment scheme. When selecting which farms will be the subject to animal welfare controls under Dir. 98/58, the controls have to include a minimum percentage of the farms enrolled in the scheme. Any welfare non-compliances detected in farms enrolled in the scheme are reported to ARMA.

16. The audit team visited two farms. PVI inspectors explained on site how they performed their animal welfare checks and what information they gathered about the farm prior to coming to inspect it:
    - The explanations covered relevant points with the main emphasis and time spent being on resource-based parameters related to minimum stall dimensions, environmental parameters, record keeping, facilities, hygiene and equipment requirements;
    - Equipment was available to measure environmental parameters and stall dimensions as required by Article 4(2)(d) of Reg. 882/2004;
    - Audit team queries regarding the evaluation of animals to decide on their welfare status resulted in replies referring to presence of wounds or injuries, aspect of the cows' udder, cleanliness and hoof condition;
    - Both farms kept cows tethered in stalls with abundant straw bedding. Stall dimensions were compliant with minimum national requirements. Most cows were longer than the stalls, but the audit team noted that animals did not present significant lesions on their hind legs that would indicate unsuitable accommodation. One of the farms kept part of the cows (the milking ones) in a building with a loose house system with access to stalls with abundant straw bedding. These stalls were longer than the stalls for the tethered animals.

17. The GVI collects the results of PVIs' welfare inspections through the Voivodship (Regional) Veterinary Inspectorates, for the purposes of Dec. 2006/778. PVIs carried out 25 563 general animal welfare inspections of cattle farms (dairy and beef) in 2013 and 24 883 in 2014. For both years, 83% of the farms were reported in full compliance. Regarding conditions for rearing calves, 20 063 inspections were performed in 2013 and 19 316 in 2014. For both years, 83% of farms were in full compliance.
18. The most frequent non-compliances reported in 2013 and 2014 for both cattle and calves concerned 'Buildings and accommodation' (including insufficient stall dimensions), record keeping and the provision of feed, water and other substances. The PVIs visited indicated that from their analysis the main reasons for these non-compliances were old

farm structures that needed renovation, excessive number of animals for the available space due to calving season or increased herd size, and increased inspectors' attention on quality of record keeping due to the addition of this criterion for cross-compliance controls as from 2013.

19. Data provided by ARMA indicated that 274 dairy farms receiving single farm payments had animal welfare non-compliances in 2014. The most frequent non-compliances concerned access to water (29% of farms with non-compliances) and medicinal and mortality records (20% of farms with non-compliances).

Conclusions on assurances from competent authority activities on farmer's compliance with legal requirements

20. The level of checks together with the detailed instructions for controllers and risk-based planning ensure compliance of farms with structural requirements linked to cattle welfare. The systems is less robust for ensuring that other factors which might impact animal welfare (e.g. lameness, nutritional status) are controlled systematically and in a harmonised manner.

5.3 INDICATORS OF ANIMAL WELFARE

Legal requirements

Directive 98/58/EC.

Articles 3, 4, 6, 7, 17 and Appendix B of the Council of Europe Recommendation Concerning Cattle.

Paragraphs 6 and 15 of Annex I to Directive 2008/119/EC.

Findings

21. The main animal welfare indicators identified, and how they are used, are listed in Table 1 below:

Table 1

Indicators	WHO uses them?	HOW are they being used?	What are the TRENDS?
Related to MASTITIS **Somatic cell count**	GVI Federation of Cattle Breeders and Dairy Farmers Dairy processors	Official controls Genetic selection Penalties	National level data not immediately available

Related to LAMENESS	GVI Federation of Cattle Breeders and Dairy Farmers	Condition of hooves Conformation of legs and hooves	National level data not available
Related to REPRODUCTIVE diseases/issues	Federation of Cattle Breeders and Dairy Farmers	Genetic selection (indirectly through their impact on fertility)	National level data not available
Related to METABOLIC diseases	Federation of Cattle Breeders and Dairy Farmers Warsaw University of Life Sciences	Not yet in use Research	

22. Milk testing for somatic cell count (an indicator of mastitis) is the almost universally used (all farms that place milk in the market) animal based welfare indicator. Sometimes, signs of metabolic diseases such as acidosis and ketosis are also used.
    - Somatic cell count is performed by dairy processors to ensure compliance with raw milk criteria legal requirements. The limit value is the maximum legally allowed (≤400 000/ml) and dairy processors will usually impose a payment deduction if the limit is exceeded and, if the rolling geometric average exceeds the limit, they suspend milk collection.
    - The Federation of Cattle Breeders and Dairy Farmers is planning to add parameters related to acidosis and ketosis into its milk testing. The Warsaw University of Life Sciences also took these into account within the "Healthy Cow" project.

23. The mentioned Federation of Cattle Breeders created a selection index that includes animal based indicators such as milk yield and composition, somatic cell count, conformation, fertility, and longevity, and verifies such indicators through milk testing and on-site advisory services to the farms subscribing to that programme. Approximately 36% of the dairy cattle in Poland belong to farms subscribed to this programme.
24. For the remaining cattle population, dairy farmers carry out daily checks for injuries and the general health status of their animals but indicators such as lameness and/or body condition scores, longevity, reproductive diseases and disease in calves are not yet used systematically as possible indicators of animal welfare issues.

Conclusions on indicators of animal welfare

25. Other than somatic cell count, the use of animal based welfare indicators, which can

help identify and prevent animal welfare issues from developing, is still not widespread or systematic in Poland.

6 OVERALL CONCLUSIONS

The measures in place ensure that cattle on dairy farms are not caused unnecessary pain, suffering or injury. However, the limited use made of animal based welfare indicators, together with weaknesses to ensure a systematic and harmonised assessment of those indicators – such as nutritional status, reproductive diseases and lameness – reduce the potential for detection of animal welfare issues.

Public, semi-public, private entities or associations, and research bodies have some involvement and positive impact on the welfare of cattle. As the overall coordination and steer of the activities undertaken is limited, their potential impact and effectiveness is modest.

7 CLOSING MEETING

A closing meeting was held on 15 April 2016 with representatives of the competent authorities, at which the main findings and preliminary conclusions of the audit were presented by the audit team.

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
Dir. 98/58/EC	OJ L 221, 8.8.1998, p. 23-27	Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes
Dec. 2006/778/EC	OJ L 314, 15.11.2006, p. 39-47	2006/778/EC: Commission Decision of 14 November 2006 concerning minimum requirements for the collection of information during the inspections of production sites on which certain animals are kept for farming purposes
Dec. 78/923/EEC	OJ L 323, 17.11.1978, p. 12-13	78/923/EEC: Council Decision of 19 June 1978 concerning the conclusion of the European Convention for the protection of animals kept for farming purposes
Dec. 92/583/EEC	OJ L 395, 31.12.1992, p. 21-21	92/583/EEC: Council Decision of 14 December 1992 on the conclusion of the Protocol of amendment to the European Convention for the Protection of Animals kept for Farming Purposes
Dir. 2008/119/EC	OJ L 10, 15.1.2009, p. 7-13	Council Directive 2008/119/EC of 18 December 2008 laying down minimum standards for the protection of calves
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
Reg. 1782/2003	OJ L 270, 21.10.2003, p. 1-69	Council Regulation (EC) No 1782/2003 of 29 September 2003 establishing common rules for direct support schemes under the common agricultural policy and establishing certain support schemes for farmers and amending Regulations (EEC) No 2019/93, (EC) No 1452/2001, (EC) No 1453/2001, (EC) No 1454/2001, (EC) 1868/94, (EC) No 1251/1999, (EC) No 1254/1999, (EC) No 1673/2000, (EEC) No 2358/71 and (EC) No 2529/2001

ANNEX II – PRUDENT USE OF ANTIMICROBIALS

Information was collected on measures which included any of the following points in Section 6.4 of the guidelines for the prudent use of antimicrobials in veterinary medicine (2015/C299/04):

- Avoid the prophylactic use of antimicrobials in new-born calves (e.g. antimicrobials added to milk replacers) by instead implementing good farming practices (e.g. to ensure high standards of hygiene);
- Develop preventive strategies (e.g. vaccinations and feeding colostrum to calves);
- Avoid the systematic treatment of cows at drying-off, and consider and implement alternative measures on a case-by-case basis.

The national policy on prudent use of antimicrobials is focusing on the poultry and pig sectors and no particular additional measures are in place specific to the dairy farming sector.

There were several meetings/conferences/training in 2015, with GVI participation of different levels and services, during which the subject of antibiotic resistance and the prudent use of antibiotics in veterinary medicine was discussed:

- March, June, December 2015 - meetings of provincial inspectors, with approximately 20 participants per meeting;
- September 2015 - training for provincial inspectors and district inspectors. Feed – approximately 350 participants;
- September 2015 - III National Conference .: "Supervision and the use of veterinary medicinal products - casuistry and perspectives" – attended by private pratitioners and official inspectors (approximately 100 participants);
- October 2015 - training "Antibiotic resistance in animals and food" at the National Veterinary Institute - National Research Institute in Pulawy attended by approximately 80 GVI staff.

All farmers met stated that feeding colostrum to calves was a standard practice for them and that there was no practice of adding antimicrobials to milk replacers. On the other hand almost all of them systematically treated their cows with antibiotics at drying-off.