



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis

DG(SANTE) 2016-8752 - MR

FINAL REPORT OF AN AUDIT
CARRIED OUT IN
ROMANIA
FROM 11 APRIL 2016 TO 15 APRIL 2016
IN ORDER TO
EVALUATE THE ANIMAL HEALTH CONTROLS IN PLACE FOR IDENTIFICATION
AND TRACEABILITY OF EQUIDAE

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

This report describes the outcome of an audit in Romania, carried out from 11 to 15 April 2016, as part of the published Directorate-General Health and Food Safety audit programme.

The objective of the audit was to evaluate to what extent national measures and controls in place ensure effective identification and traceability of live equidae and equine meat in the country as a support for both animal health controls and labelling issues.

Overall, the report concludes that:

- Weaknesses exist with the equine identification system. The absence of coordination between the authorities involved leads to duplication of efforts with data recording resulting in two incomplete systems running in parallel. Identification documents are frequently issued with no regard to the lifetime treatment of horses with veterinary medicinal products or the animals' age. Consequently, ineligible animals enter the food chain and the control programme for equine infectious anaemia misses an unknown number of animals due to their late identification.*
- The system of sanctions applied has been ineffective to reduce the high level of noncompliance regarding equine identification.*
- The national database for equidae is not used for disease control purposes. Its usefulness for other purposes is also limited, as data is not systematically updated and information regarding exclusion of the animal from the food chain is not recorded.*
- Prior to January 2016, certification of live horses moving from approved holdings in Romania to other EU countries, did not give sufficient guarantees regarding equine infectious anaemia. This resulted in ineligible animals being sent to other Member States which increased the risk of spreading the disease through the EU. From January 2016, the updated sampling instructions issued by the authorities, if correctly implemented, should negate this risk.*

The report contains recommendations to the competent authorities to address the shortcomings identified.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
AGID	Agar gel immunodiffusion
ANZ	National Agency for Zootechnics
CSVFSA	County Sanitary Veterinary and Food Safety Authority
EIA	Equine infectious anaemia
FCI	Food chain information
NSVFSA	National Sanitary Veterinary and Food Safety Authority
OV	Official veterinarian

1 INTRODUCTION

This audit took place in Romania from 11 to 15 April 2016. The audit team comprised two auditors from Directorate-General Health and Food Safety.

An opening meeting was held on 11 April 2016 with the central competent authorities responsible for identification and traceability of equidae i.e. the National Sanitary Veterinary and Food Safety Authority (NSVFSA) and the National Agency for Zootechnics (ANZ). At this meeting the objectives and itinerary for the mission were confirmed by the audit team and the control systems were described by the authorities.

The audit team was accompanied throughout the audit by representatives of the NSVFSA and ANZ.

2 OBJECTIVES AND SCOPE

The objective of the audit was to evaluate to what extent national measures and controls in place ensure effective identification and traceability of live equidae and equine meat in the country as a support for both animal health controls, and labelling issues.

The scope of the audit included:

- Identification of equidae born in the EU and imported;
- Performance of tools supporting identification and traceability of equidae;
- Enforcement and use for disease control purpose;
- Traceability of equine meat produced in slaughterhouses.

The main audit criteria are listed in the Annex 1 to this report. Legal acts quoted in this report refer, where applicable, to the last amended version.

In pursuit of these objectives, the following sites were visited:

Visits / meetings	No.	Description
Central Competent Authorities (NSVFSA & ANZ)	3	Opening, clarification and closing meeting
ANZ	1 2	Central database for equidae County Issuing Bodies
NSVFSA	1	County office
Slaughterhouse	1	
Approved holding	1	
Rendering plant	1	

3 LEGAL BASIS

The audit was carried out under the general provisions of 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.

4 BACKGROUND

Commission Implementing Regulation (EU) 2015/262, applicable since 1st January 2016, revised the Union system for the identification of equidae, in order to ensure that it is safe but also user-friendly. The system comprises a single lifetime identification document (passport), a method of identity verification which ensures an unequivocal link between the identification document and the equine animal, a database maintained by the passport issuing bodies and a central database. The identification document (passport) for equidae is a multipurpose document serving both animal and public health needs.

Romania is under strict restriction of EU trade of live equidae since 2010 (Commission Decision 2010/346/EC) due to presence of equine infection anaemia. Romania is currently implementing a control programme which includes the slaughter of positive animals. Such a programme must be supported by an effective identification and registration system.

Romania slaughters around 17,000 equidae for meat production a year¹. Frauds identified in the EU in 2013 in relation to identification of horsemeat emphasised the importance of traceability for this commodity.

5 FINDINGS AND CONCLUSIONS

5.1 IDENTIFICATION

Legal requirements

Commission Implementing Regulation (EU) 2015/262.

Findings

Competent Authority

1. Full details on competent authorities are available in the country profile at: http://ec.europa.eu/food/audits-analysis/country_profiles/details.cfm?co_id=RO#ControlSystems
2. Order No. 651 of 11 July 2013 establishes the process for identification and registration of equidae and defines the obligations of the CAs and those of other parties. This Order was issued jointly by the Minister of Agriculture and Rural Development and the President of the NSVFSA.

¹ Data for 2011 to 2013 from Ministry of Agriculture and Rural Development and from the NSVFSA http://www.hsi.org/assets/pdfs/horses_EU_facts_figures_EU_horsemeat_trade.pdf

3. NSVFSA coordinates the work of the free practicing veterinarians responsible for identifying equidae for breeding and production. NSVFSA have an enforcement role and can perform investigations and impose sanctions related to horse identification.
4. NSVFSA advised that operationally, each county is subdivided into sanitary veterinary circumscription zones. Free practicing veterinarians sign a service agreement with County Sanitary Veterinary and Food Safety Authority (CSVFSA) and are empowered to perform controls such as implantation of equine transponders, blood sampling for equine infectious anaemia (EIA) and issue of national movement certificates for equidae. In one CSVFSA office visited, free practicing veterinarians were given responsibility to perform controls in one or two sanitary veterinary circumscription zones.
5. ANZ is the CA responsible for issuing all equine identification documents in Romania and operates via a network of one central and 41 county offices. Additional obligations of ANZ include the operation of the national database for equidae, the identification of all registered horses, coordination of the identification and registration of equidae and the allocation of unique equine life numbers. ANZ also have an enforcement role enabling them to initiate investigations and impose sanctions.
6. NSVFSA staff have access to the national database for equidae at county level and free practicing veterinarians can be authorised to input equine identification data directly (with the exception of drawing details).
7. CAs (NSVFSA and ANZ) confirmed they are not yet implementing Commission Implementing Regulation (EU) 2015/262 (Regulation 2015/262). They indicated the requirements of the repealed Commission Regulation (EC) No 504/2008 continue to be applied in Romania.

Identification document

8. The equine identification document (passport) issued in Romania is related to the type of horse. The audit team reviewed passports issued to registered horses which were printed directly off the ANZ database. These were of indivisible format and contained all sections as required by Annex I, Part 1 to Regulation 2015/262. The numbering of the section topics did not correspond to Annex I, Part 1 to Regulation 2015/262. CA estimated there are between 10 000 – 20 000 registered horses in Romania. Free practicing veterinarians implant a transponder to provide the unequivocal link between the horse and identification document. All requirements for completing the identification document e.g. a narrative describing the equine animal and a completed outline diagram, are performed by ANZ staff.
9. Horses for breeding and production are issued with a pre-printed identification document. The free practicing veterinarian implants a transponder and completes the outline diagram. This document is then sent to ANZ or, for free practicing veterinarians with access to the ANZ database, uploaded. In all cases, the drawing must be sent in hard copy to ANZ. A pre-printed identification document is then issued. The requirement to include a section for the suspension / revalidation of the identification

document for movement of equidae is not included in the pre-printed identification document contrary to Article 7(2)(b) of Regulation 2015/262.

10. These pre-printed identification documents are currently issued with the section on administration of veterinary medicinal products stapled to the main document as an addendum. The audit team reviewed 20 identification documents returned to two county ANZ offices from slaughterhouses. Examples were seen of this single page being stamped to show association with passport, the single page being cut into separate sections with no attempt to link (stamp) these separate sections to the main passport and the section on administration of veterinary medicinal products being absent. This is not in compliance with Article 7(2)(b) of Regulation 2015/262. Furthermore, the requirement for the passport to be indivisible is not met as required by part 2(c) of Annex I of Regulation 2015/262.
11. NSVFSA advised that all equine holdings, including backyard holdings with a single horse, are issued with a holding number. For commercial holdings, the holding number must be requested from NSVFSA. For backyard holdings, free practicing veterinarians allocate holding numbers. Holding numbers are stored in a national holding register managed by NSVFSA.
12. CAs stated that for 2016 they had secured funding to modify ANZ database and the previous lack of funding was cited as the main reason for not currently implementing Regulation 2015/262. This will allow direct printing of all passports (including duplicate and replacements) from database and the reformatting of passports to include all sections required by Regulation 2015/262. Implementation of these changes to database, along with national legislation, is planned by ANZ and NSVFSA for autumn 2016.
13. For 2014 and 2015, ANZ confirmed the total number of passports issued and the age groups they were issued to as follows :

Age when issued	0 – 6 months	6 – 12 months	> 12 months
Number of horses	1,878	9,818	53,839

During this period, horses should have been identified in accordance with Article 5(6) of Regulation (EC) No 504/2008 i.e. before 31 December of the year of birth or within 6 months following the date of birth. More than 80% of these horses were not identified on time with a limited number of sanctions applied by CAs (see 42 below).

14. Since 1 January 2016, Romania uses the derogation provided by Article 12(2) of Regulation 2015/262 to require equidae to be identified by 6 months or the calendar year of birth and in any event before leaving permanently the holding of birth.
15. ANZ issued an operational procedure for the issue of replacement / duplicate equine identification documents on 4 March 2015. This outlines the requirement to issue a duplicate identification document when original is lost but transponder code can be read. If previous identification of animal cannot be established, a transponder has to be implanted and a replacement identification document issued. Identification document

must be clearly marked "duplicate" or "replacement" as appropriate which is in line with Articles 29 & 32 of Regulation 2015/262.

16. ANZ provided the following data for issue of duplicate and replacement identification documents :

Year	2014	2015
Duplicate Identification documents issued	1545	2338
Replacement Identification documents issued	0	0

17. ANZ confirmed it is not currently possible to print a replacement identification document from database. Consequently, equidae not identified by 12 months of age are issued a standard identification document with no associated restrictions.
18. ANZ stated they did not have the technical knowledge to complete the administration of veterinary medicinal products section when issuing duplicate / replacement identification documents. They considered this a responsibility of NSVFSA but no mechanism exists to notify NSVFSA when duplicate / replacement identification documents are issued. Consequently, duplicate equine identification documents issued by ANZ do not have the section on administration of veterinary medicinal products completed. This lack of coordination between NSVFSA and ANZ is not in compliance with Article 4(3) of Regulation 882/2004.
19. Equidae which are issued a duplicate or replacement identification document are not excluded from the food chain contrary to the requirements of Articles 29(2)(c) and 32(2)(c) of Regulation 2015/262.

Identification verification (Transponder)

20. The unique equine life number is issued through the county ANZ network. The 15 digit alpha-numeric code comprises the country code for Romania (642) followed by three digit code relating to the county of issue. This is followed by "5N" for horses for breeding and production or the last two digits of the year of birth for registered horses. Finally, a seven digit number, starting at "1" in each county.
21. Order No. 114 of 15 March 2013 describes the technical requirements for the official means of identifying equidae in Romania. The 15 digit transponder code comprises the country code for Romania (642) followed by the code of the species (01). The next three characters represent the manufacturers' code and the final seven characters - the unique identification code. CA confirmed they have approved six manufacturers (one of which has two codes) to supply transponders.

Official Controls

22. Order No 37 of 9 April 2010, issued by NSVFSA, sets the requirements for national movement of equidae. This includes the requirement for equidae to be accompanied by a veterinary health certificate and their identification document. The veterinary health

certificate is completed by free practicing veterinarians and must include transponder codes. The cost of the veterinary health certificates is funded by the owner / keeper of equidae.

23. For national movements of equidae, the Romanian EIA surveillance programme requires a negative Coggins test result within 90 days of movement. If more than 90 days has elapsed since the last test, a negative test within 10 days of movement is required. These tests are not required for equidae transported direct to slaughter. Movement is not defined in the above mentioned order. Consequently, the types of movement requiring a veterinary health certificate are unclear to the audit team.
24. CA issued Service Note No. 20128/02.02.2010 providing instruction to official control staff on the implementation of food chain information (FCI). More recently, Service Note No. 28958/07.04.2016 was issued to provide instructions to staff performing official controls related to identification and traceability of live equidae intended for slaughter. In the slaughterhouse visited, the audit team reviewed documentation relating to three equidae presented for slaughter. Each equine was accompanied by an identification document, veterinary health certificate and FCI. The audit team saw the official veterinarian reading transponders and correlating each horse to relevant documentation. One of the adult equidae had an identification document issued on 4 April 2016 and was presented for slaughter eight days later.
25. For all three equidae, FCI was not completed at section 3.4 meaning there was no attestation that withdrawal periods, for any veterinary medicines administered over the previous month, had been respected. CA agreed FCI was incomplete. A further five FCI documents from the previous weeks slaughter were reviewed. In three FCI documents (covering 46 horses) section 3.4 had not been completed. Official controls allowed these 46 animals to proceed for slaughter for human consumption. The incomplete FCI is not in compliance with Section III to Annex II of Regulation (EC) No 853/2004.
26. The audit team reviewed two veterinary health certificates (from the previous week) for movement of horses from traders to the slaughterhouse visited, covering 20 and 11 animals respectively. 15 animals in the first, and six in the second, had consecutive transponder numbers. Seven consecutive numbers were checked on ANZ database and all of them had corresponding identification documents issued 1-2 days before slaughter of which two were issued to horses greater than 2 years old. CA agreed that horses with consecutive numbers had been identified at traders holding and had moved there from holding of birth with no identification.
27. The audit team reviewed 10 passports returned from equidae slaughtered in March 2016 from the slaughterhouse visited. Three were duplicate passports and two were "original" passports (issued for the first time). The ages of the animals ranged from 1 to 15 years old. In eight of the ten, the outline diagram had not been completed and no photograph or print depicting the animals was available.
28. The audit team checked data held on ANZ database relating to five horses from a holding approved under Commission Decision 2010/346/EU (and visited by audit team). In the week prior to visit, one horse had been identified and issued with a passport for

the first time at 5 years of age. A second horse was re-identified and issued a duplicate passport.

29. Duplicate identification documents or the identification documents issued to horses older than 12 months (mentioned in paragraphs 26, 27 and 28 above) did not have the section on administration of veterinary medicinal products completed.
30. In slaughterhouse visited, the audit team observed transponders being recovered from carcasses and saw the procedure for their subsequent destruction under official veterinary supervision as required by Article 34(2) of Regulation (EU) 2015/262.
31. NSVFSA confirmed there was no written procedure when transponder could not be recovered from the body of an animal slaughtered for human consumption. The OV confirmed that in such a case, carcass would be passed as fit for human consumption with no treatment of the meat or part of the meat containing the transponder as unfit for human consumption. This is not in compliance with Article 34(3) of Regulation (EU) 2015/262.
32. CA provided audit team with user guides for the two transponder reading devices used in slaughterhouse visited. This confirmed they were compatible with standard ISO 11785 as required by Article 2(n)(ii) of Regulation (EU) 2015/262.

Database

33. The audit team reviewed database entries for the approved holding visited. One horse had been identified the previous week and was issued with a passport for the first time at 5 years of age. Consequently, it could not have been tested for EIA in previous years as required by the annual surveillance programme. A second horse had been re-identified, also the previous week, and issued a duplicate passport. CAs confirmed it is not possible to record in the database that equidae are not intended for slaughter for human consumption contrary to Article 38(1)(l) of Regulation 2015/262. The remaining information, relating to equidae checked by audit team, was correctly recorded in the database as required by Article 38(1) of Regulation (EU) 2015/262.
34. ANZ confirmed that details of death / slaughter of equidae could only be amended on database on receipt of passports from slaughterhouse or owners of horses.
35. NSVFSA have access to the equine database at county level but do not use it for disease control purposes. Instead, each county has established their own standalone records which may simply be an excel spreadsheet. These records are only accessible by that county.
36. Order 29 of 2014 requires an annual census of all bovine, ovine, caprine and porcine species by NSVFSA. This is carried out by free practicing veterinarians on behalf of CSVFSA. During this census, a count is taken of the number of equidae present. NSVFSA confirmed that during the census on each holding, free practicing veterinarians do not use the previous year's census or information recorded on ANZ database as a reference for the number of equidae present on a particular holding. In counties visited, CSVFSA establish a new set of records for each census².

37. In one county visited by audit team, census results were reviewed for a township made up of several villages. Data recorded consisted of: transponder code, sex, age, holding code, address and owner details.
38. Equidae sent for rendering are accompanied, inter alia, by a sanitary veterinary certificate issued by free practicing veterinarians. This certificate includes consignor and consignee details and transponder number. On a monthly basis, free practicing veterinarians report all mortalities to CSVFSA. This data is reported on a quarterly basis to NSVFSA who confirmed they did not share this information with ANZ. No other source exists to supply this information to ANZ.
39. The identification document does not accompany equidae sent to the rendering plant. It is the responsibility of the owner / keeper to return identification document to the ANZ office in the county where the horse was last registered.
40. Information on the number of live equidae registered in Romania varied significantly between CAs. In one county visited by audit team, CSVFSA recorded a horse population of approximately 5500 equidae in contrast to 9951 recorded on ANZ database (as of 14 April 2016). At a national level, in 2015, ANZ equine database recorded 762 760 animals while NSVFSA recorded 455 614 equidae. CAs confirmed there is currently no collaboration between them to address this inconsistency.

Enforcement

41. The audit team reviewed worksheets submitted to CSVFSA by free practicing veterinarians. For EIA sampling, details included: holding number, owner, location and transponder numbers. CSVFSA stated each free practicing veterinarian was supervised at least annually with an on-site visit when checks were performed to verify equine animals were present and their identification (transponder) was verified. Currently, CSVFSA have no checklist for this supervision.
42. CAs provided data on enforcement measures which included warnings and financial penalties relating to equidae for the period 2013 – 2015 as follows :

Year	Enforcement actions
2013	1,193
2014	2,749
2015	1,823

43. The audit team reviewed sanctions imposed on one holding which assembled equidae for slaughter. During the first three months of 2016 this holding had 12 fines imposed by ANZ relating to identification and one fine imposed by CSVFSA relating to a movement issue. Fines imposed were of the magnitude 800 – 1000 Lei (approximately 200 Euro).

² In their response to the draft report the competent authority noted that in May 2016 Service Note No. 6243/12 was issued. This requires CSVFSA to provide the County ANZ office with a list of equidae tested for EIA and holding details where they were tested to facilitate update of the national database for equidae. Additionally, cooperation protocol no. 30 254/08.2016 was signed between NSVFSA and ANZ in August 2016.

CAs confirmed that if fines were paid within 48 hours, national law reduced the level of fine to half the minimum fine.

44. ANZ confirmed staff from their central office had performed controls on eight county offices in 2015 which covered several species including equidae.

Conclusions on identification

45. Weaknesses exist in the system to issue equine identification documents. These do not contain all the required information and are frequently issued with no regard to the lifetime treatment of horses with veterinary medicinal products or the animals' age. Together with incomplete FCI, this results in ineligible animals entering the food chain. Additionally, late identification results in an unknown number of horses not being tested for EIA in accordance with national surveillance programme requirements.
46. The system of sanctions applied in Romania has been ineffective to address the existing high degree of non-compliance regarding identification of equidae.
47. The absence of cooperation and coordination between ANZ and NSVFSA leads to duplication of efforts and data regarding horses and to uncertainty on the reliability of most data and statistics regarding equidae. The opportunities missed to share and update data restricts their usefulness for disease control purposes.
48. The ANZ equine database has a very limited usefulness for animal health and public health controls. This is because data from annual census and rendering plants do not reach the database and there are no other mechanisms to periodically update it. Furthermore, the database does not include information when animals must be excluded from entering the food chain.
49. The lack of instruction and / or training to deal with non-recovered transponders has caused unfit meat to enter the human food chain.

5.2 SUPPORT FOR ANIMAL HEALTH CONTROLS, TRADE AND IMPORTATION OF EQUIDAE

Legal requirements

Commission Decision 2010/346/EU on protective measures with regard to equine infectious anaemia in Romania.

Findings

50. Order 46/2014 (which replaces Order 52/2010) approves the plan for EIA eradication in Romania. The Order provides implementing rules for Commission Decision 2010/346/EU including the approval procedures for holdings trading equidae.
51. NSVFSA have established a list of approved holdings which are eligible to move equidae to other Member States:
 - In accordance to Article 2 of Decision 2010/346/EU (for reasons other than trade or article 3 provisions);
 - To participate in certain competitions and events in accordance to Article 3 of Decision 2010/346/EU.

The list contains the holding name, geographical location and details of official veterinarian responsible for the approved holding as required by Article 6(a) of Regulation 2010/346/EU. This list is publically available on NSVFSA website at <http://www.ansvsa.ro/?pag=839>.

52. The audit team reviewed the identification document relating to a horse for breeding and production, with a positive EIA test result. EIA was confirmed in March 2013 and the animal slaughtered in March 2015. The identification document correctly recorded the positive test result as required by Annex I, Part 1 of Regulation 2015/262. However, movement restrictions applied to this animal could not be recorded as the identification document did not include section III (see (9) above). NSVFSA confirmed that a lack of funding for EIA eradication during the period 2006 – 2007 reduced confidence in the compensation process and made some owners reluctant to release their animals for slaughter. Since 2009, the funds for compensation are allocated by the NSVFSA.
53. The surveillance and eradication programme for EIA is carried out according to NSVFSA Orders 29/2014 and 46/2014. Order 29/2014 sets the requirements for the national surveillance programme and requires all equidae over 6 months to be tested annually between February and April. Equidae from other specialized holdings e.g. studs are tested twice per annum at 6 monthly intervals.
54. NSVFSA confirmed that sampling for EIA can only take place when equidae are correctly identified. Order 651/2013 places a responsibility on the owner / keeper to request free practicing veterinarians to identify horses and for free practicing veterinarians to perform this task. Furthermore, Order 60/2013 makes it compulsory for free practicing veterinarians to implant a transponder in any unidentified horse they encounter.

55. The audit team checked the most recent intra union trade certificate issued for a registered horse from the approved holding visited. NSVFSA advised that all horses on the holding were sampled and tested for EIA in March and September 2015. The horse certified had an individual AGID test performed with negative results on a blood sample taken within 10 days of the date of movement as required by Article 3(a) of Commission Decision 2010/346/EU. However, the remainder of horses on the holding had undergone an AGID test, with negative results, on blood samples taken more than 180 days before the date of movement. This is not in accordance with Article 3(b) of Commission Decision 2010/346/EU.
56. On 29 January 2016, NSVFSA issued a Service Note relating to the sampling regime necessary to fulfil the requirements of Article 3 of Commission Decision 2010/346/EU to permit trade in equidae throughout the year. The Service Note details the requirement to perform an AGID test on blood samples taken from all equidae present on the approved holding at three monthly intervals.
57. The audit team reviewed two Common Veterinary Entry Documents for importation of equidae to Romania. The two animals were correctly listed in ANZ database. CA explained they had been allocated a Romanian unique equine life number as the equine identification documents which accompanied them did not have any.

Conclusions on animal health controls, trade and importation of equidae

58. Certification of registered horses moving from approved holdings to other EU countries, prior to January 2016, did not give sufficient guarantees regarding EIA. Instructions at the time did not ensure EIA sampling was carried out at a frequency which permitted year round trade of horses. This resulted in ineligible animals being certified with an increased risk of EIA being spread through the EU. Updated sampling instructions issued in 2016 should negate this risk.

6 OVERALL CONCLUSIONS

Weaknesses exist with the equine identification system. The absence of coordination between the authorities involved leads to duplication of efforts with data recording resulting in two incomplete systems running in parallel. Identification documents are frequently issued with no regard to the lifetime treatment of horses with veterinary medicinal products or the animals' age. Consequently, ineligible animals enter the food chain and the control programme for equine infectious anaemia misses an unknown number of animals due to their late identification.

The system of sanctions applied has been ineffective to decrease the high level of non-compliance regarding equine identification.

The official equine database is not used for disease control purposes. Its usefulness for other purposes is also limited, as data is not systematically updated and information regarding exclusion of the animal from the food chain is not recorded.

Prior to January 2016, certification of live horses moving from approved holdings in Romania to other EU countries, did not give sufficient guarantees regarding equine infectious anaemia. This resulted in ineligible animals being sent to other Member States which increased the risk of spreading the disease through the EU. From January 2016, the updated sampling instructions issued by the authorities, if correctly implemented, should negate this risk.

7 CLOSING MEETING

A closing meeting was held on 15 April 2016 with the central Competent Authorities. At this meeting the audit team presented the findings and preliminary conclusions of the audit. Some clarifications were provided by the Competent Authorities who did not express any disagreement with the preliminary conclusions at the closing meeting.

8 RECOMMENDATIONS

The Competent Authority is invited to provide details of the actions taken and planned, including deadlines for their completion ('action plan'), within 25 working days of receipt of the report, aimed at addressing the recommendations set out below.

No.	Recommendation
1.	<p>The Competent Authorities should ensure that replacement identification documents are issued for equidae not identified within the time limits and that Part II of Section II of these documents is marked as not intended for slaughter for human consumption as required by Article 32(2)(c) of Regulation 2015/262.</p> <p>Recommendation based on conclusion No. 45.</p> <p>Associated findings Nos. 17, 19, 26, 27 & 28.</p>

No.	Recommendation
2.	<p>The Competent Authorities should ensure that when duplicate identification documents are issued for equidae, Part II of Section II of these documents is marked as not intended for slaughter for human consumption or Part III of Section II is marked to suspend their eligibility for human consumption for 6 months as required by Articles 29 and 31 of Regulation 2015/262 respectively.</p> <p>Recommendation based on conclusion No.45.</p> <p>Associated findings Nos.18, 19 & 29.</p>
3.	<p>The Competent Authorities should ensure effective cooperation between their services to improve the accuracy of the data held in the national database for equidae. In particular, to ensure the database includes information when animals must be excluded from entering the food chain. Regulation (EC) No 882/2004 article 4(3).</p> <p>Recommendation based on conclusion No. 47.</p> <p>Associated findings Nos. 18, 33, 36, 38 & 40.</p>
4.	<p>NSVFSA should ensure that a system is in place to ensure that when a transponder cannot be recovered from the body of an equine animal slaughtered for human consumption the meat or part of meat containing transponder is declared unfit for human consumption. Article 34(3) of Regulation (EU) 2015/262.</p> <p>Recommendation based on conclusion No.49.</p> <p>Associated findings No. 31.</p>
5.	<p>All relevant food chain information must be made available for equidae presented for slaughter. This should be verified by CA as required by Article 4(2) of Regulation (EC) No 854/2004.</p> <p>Recommendation based on conclusion No.45.</p> <p>Associated findings No.25.</p>
6.	<p>The Competent Authorities should ensure that equine identification documents are of the correct format and content. Article 7(2) and 7(3) of Regulation (EU) 2015/262.</p> <p>Recommendation based on conclusion No. 45.</p> <p>Associated findings Nos. 9, 10 & 52.</p>

The competent authority's response to the recommendations can be found at:
http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=2016-8752

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
Dir. 90/427/EEC	OJ L 224, 18.8.1990, p. 55-59	Council Directive 90/427/EEC of 26 June 1990 on the zootechnical and genealogical conditions governing intra-Community trade in equidae
Dec. 92/260/EEC	OJ L 130, 15.5.1992, p. 67-83	92/260/EEC: Commission Decision of 10 April 1992 on animal health conditions and veterinary certification for temporary admission of registered horses
Dec. 93/195/EEC	OJ L 86, 6.4.1993, p. 1-6	93/195/EEC: Commission Decision of 2 February 1993 on animal health conditions and veterinary certification for the re-entry of registered horses for racing, competition and cultural events after temporary export
Dec. 93/196/EEC	OJ L 86, 6.4.1993, p. 7-15	93/196/EEC: Commission Decision of 5 February 1993 on animal health conditions and veterinary certification for imports of equidae for slaughter
Dec. 93/197/EEC	OJ L 86, 6.4.1993, p. 16-34	93/197/EEC: Commission Decision of 5 February 1993 on animal health conditions and veterinary certification for imports of registered equidae and equidae for breeding and production
Dec. 2004/211/EC	OJ L 73, 11.3.2004, p. 1-10	2004/211/EC: Commission Decision of 6 January 2004 establishing the list of third countries and parts of territory thereof from which Member States authorise imports of live equidae and semen, ova and embryos of the equine species, and amending Decisions 93/195/EEC and 94/63/EC
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption

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. 504/2008	OJ L 149, 7.6.2008, p. 3-32	Commission Regulation (EC) No 504/2008 of 6 June 2008 implementing Council Directives 90/426/EEC and 90/427/EEC as regards methods for the identification of equidae
Dir. 2009/156/EC	OJ L 192, 23.7.2010, p. 1-24	Council Directive 2009/156/EC of 30 November 2009 on animal health conditions governing the movement and importation from third countries of equidae
Reg. 1069/2009	OJ L 300, 14.11.2009, p. 1-33	Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (Animal by-products Regulation)
Dec. 2010/346/EU	OJ L 155, 22.6.2010, p. 48-53	2010/346/EU: Commission Decision of 18 June 2010 on protective measures with regard to equine infectious anaemia in Romania
Reg. 142/2011	OJ L 54, 26.2.2011, p. 1-254	Commission Regulation (EU) No 142/2011 of 25 February 2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products and derived products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that Directive

Reg. 2015/262	OJ L 59, 3.3.2015, p. 1–53	Commission Implementing Regulation (EU) 2015/262 of 17 February 2015 laying down rules pursuant to Council Directives 90/427/EEC and 2009/156/EC as regards the methods for the identification of equidae (Equine Passport Regulation)
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