European Commission

NETHERLANDS

DG Health
and Food Safety

COUNTRY PROFILE

Progress made in the implementation of audit recommendations

Health and Food Safety

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INTRODUCTION

The Directorate-General for Health and Food Safety of the European Commission, works to assure effective control systems for food and feed safety, animal health, animal welfare, plant health and food quality labelling and to evaluate compliance with EU standards. It does this mainly by carrying out audits in Member States and third countries.

It makes recommendations to Member States to deal with any shortcomings revealed during its audits. Member States are requested to present action plans on how they intend to address these shortcomings. Article 45 (5) (a) of Regulation (EC) No 882/2004 requires that Member States take appropriate follow-up action in the light of recommendations resulting from EU controls.

DG Health and Food Safety evaluates these action plans and systematically monitors their implementation through a number of follow-up activities. Verification of the completion and effectiveness of corrective action is an integral part of this activity.

The instrument of general follow-up audits to review progress on the implementation of recommendations made was introduced in 2005. This process follows the Commission services' "package meeting" approach whereby these audits provide an opportunity to discuss open issues with the competent national authorities. In the intervening period, Member States may provide additional information on progress and, following assessment by the Commission, this may result in an update of the follow-up status of recommendations.

This part of the country profile gives the current status of actions undertaken by the Member State in response to recommendations. The aim is to provide a summary of progress by the Netherlands on the implementation of DG Health and Food Safety's recommendations.

The information in this part of the country profile has been compiled on the basis of a general follow-up audit which was carried out by our services in September 2016 and on information received since then from the authorities in the Netherlands.

Administrative follow-up and general follow-up audits are regularly conducted in order to monitor progress in relation to open recommendations. This part of the country profile will be updated at regular intervals based on the results of future DG Health and Food Safety audits and other relevant information received by Commission services from the authorities in the Netherlands.

SUMMARY OF THE PROGRESS MADE BY THE MEMBER STATE IN THE IMPLEMENTATION OF RECOMMENDATIONS MADE BY DG HEALTH AND FOOD SAFETY

The following table gives an overview of DG Health and Food Safety's audits in the Netherlands and shows the Commission services' assessment of actions taken in response to the recommendations contained in the reports of those audits.

This assessment is based on information and documentation received from the competent authorities and reviewed in the course of the 2016 general follow-up audit and on subsequent information provided by the authorities in the Netherlands.

The basis for the assessment of actions in relation to individual recommendations is presented in Sections 2.A and 2.B.1 to 2.B.12. Recent finalised audit reports that are not yet ready for follow-up are listed in Section 3.

Overview of DG Health and Food Safety's audits in the Netherlands 2011-2015[1]

Control system	Total number of finalised audits	Recommendations				
		Total	Action taken	Closed for other reasons	In progress	Action still required
Animal health	2	10	8	-	2	-
Food of animal origin	8	57	51	5	1	-
Import of animals and food of animal origin	5	14	7	3	3	1
Feedingstuffs and animal nutrition	2	16	13	1	2	-
TSE/ABP	1	3	2	1	-	-
Veterinary medicinal products and residues	1	5	5	-	-	-
Foodstuffs and food hygiene	2	8	5	2	1	-
Imports of food of plant origin	1	9	6	3	-	-
Plant protection products	-	-	-	-	-	
Animal welfare	2	10	7	-	2	1
Plant health	3	16	15	1	-	-
Quality labelling	2	13	10		3	-
Horizontal	-	-	-	-	-	-
Total	**29**	**161**	**129**	**16**	**14**	**2**
General follow-up audits	**2**	**-**	**-**	**-**	**-**	**-**

[1] These figures do not include 2015 audits for which the reports have not yet been finalised and closed-out by the responsible sector specific units in DG Health and Food Safety; therefore not followed during the 2016 GFA.

1. MAIN ISSUES

There main issues that have been identified in the Netherlands through DG Health and Food Safety's audits and still need to be addressed by the authorities include:

Specific sector issues:

- Records of daily mortality rates do not accompany the chicken broilers (kept at stocking densities above 33kg/m²) dispatched to slaughterhouses (recommendation No.: 2014-7078-2).

- The competent authority does not carry out physical checks on consignments in transit leaving the EU territory (exit checks) to ensure that the consignment received conforms to the consignments dispatched (recommendation No.: 2013-6759-2).

2. FOLLOW UP STATUS OF RECOMMENDATIONS

This part of the country profile gives the current status of actions undertaken in response to DG Health and Food Safety's recommendations. The aim is to provide a summary of progress by the Netherlands on the implementation of our recommendations.

For the purpose of assessment, the terms: "Action taken," "In progress", "Closed for other reasons" and "Action still required" are defined as follows:

"Action taken": Appropriate measures to address the recommendation have been implemented by the competent authority. The recommendation is therefore closed.

"In progress": Appropriate measures to address the recommendation have been initiated by the competent authority but not all of the measures have been implemented. The recommendation therefore remains open.

"Closed for other reasons": For administrative, technical or legal reasons, follow-up of the recommendation is no longer appropriate. The recommendation is therefore closed.

"Action still required": Appropriate measures to address the recommendation have not been initiated by the competent authorities. The recommendation therefore remains open.

Given the nature and scope of the general follow-up audit, no verification through audit on-the-spot was carried out. The assessment undertaken through the general follow-up audit is considered complementary to other follow-up actions and verifications that may be necessary and carried out as part of future sectoral audits by our services. Recommendations classified as “In progress" or "Action still required" are not considered to require any immediate specific legal or administrative action on the part of Commission services. These recommendations will remain the subject of monitoring by Commission services to assess progress. If as a result of this monitoring the Commission services consider the situation in regard to any of these recommendations warrants additional action on its part, it will take the appropriate measures.

It should be noted that the number of recommendations in this overview does not represent, of itself, a measurement of the degree of responsiveness by the competent authorities or of the seriousness of problems. Some recommendations may be related to minor technical aspects while others may refer to more problematic, systemic, issues.

Acronyms are used throughout the following chapters for the sake of brevity. A list of acronyms, abbreviations and special terms is given in Annex I as a guide for the reader.

2.A HORIZONTAL RECOMMENDATIONS

There are no recommendations currently open for follow-up.

2.B SECTORAL RECOMMENDATIONS

2.B.1 Animal Health

Audit 2013-6775 of 28 January 2013 in order to evaluate the implementation of contingency plans in relation to animal health, including provisions on the protection of animals during depopulation for disease control		
Recommendation	Basis for assessment	Current Status
2013-6775-1 The competent authority should ensure that there are contingency plans and staff instructions in place to meet the requirements in EU legislation, in particular Annex III and VI(e) to Council Directive 2002/60/EC (ASF), Annex III(6) to Council Directive 2000/75/EC (BT), and Annex IV(6) to Council Directive 92/35/EEC (AHS).	This recommendation is based on conclusion in Section 5.2.2 and related findings in Section 5.2.2 of the audit report that despite well elaborated strategy to handle most of situations in the context of epizootic diseases neither contingency plan (CP) nor operational manual (OM) / work instructions (WIs) for dealing with African swine fever (ASF) are in place. Moreover, there are no staff instructions for dealing with confirmed outbreak of African horse sickness (AHS) and Bluetongue (BT). In its response the Netherlands Food and Consumer Product Safety Authority (NVWA) stated that: a) The final CP for ASF will be included in the CP for classical swine fever (CSF); approved CP will be published on the website before 1 July 2013. b) The final CP for BT is in preparation and approval is foreseen in 2014.	Closed due to action taken

Audit 2013-6775 of 28 January 2013 in order to evaluate the implementation of contingency plans in relation to animal health, including provisions on the protection of animals during depopulation for disease control		
Recommendation	Basis for assessment	Current Status
	c) The final CP for AHS will be finalised in December 2013. Until that time, the basic CP will be updated and published on the website in 2013. d) The basic CPs for vesicular stomatitis, swine vesicular disease, Newcastle disease, peste des petit ruminants, rindpest, lumpy skin disease and sheep and goat pox will be updated to reflect changes in competent authority structures and published on the website: www.riiksoverheid.nl ultimately in July 2013. As regards OMs / WIs, the aimed deadline for finalising OMs / WIs regarding ASF, BT and AHS is the end of December 2013. e) NVWA will produce an operational manual and work instruction concerning, between the others, vector related diseases. The experts from the Centrum Monitoring Vectoren of NVWA (a unit specialised in vectors and their control) will be consulted for drafting these documents and will probably also play an important role during outbreaks of vector related diseases. During the 2016 GFA NVWA stated the following: The final version of joint CP for CSF and ASF is available at: www.rijksoverheid.nl. Due to absence of diseases vector - tick: *Ornithodorus moubata porcinus* in the Netherlands, CP does not contain a separate chapter on this vector. Nonetheless, it contains paragraphs about vector controls; namely paragraph: 12.3.1 and 12..5.2.1, 7.5 and 7.19). NVWA presented copy of CP for CSF and ASF together with instruction for suspect case and working procedure. NVWA provided copies of updated CPs for Bluetongue and African horse sickness. CPs for swine vesicular disease, rindpest, peste des petit ruminants, lumpy skin disease and	

Audit 2013-6775 of 28 January 2013 in order to evaluate the implementation of contingency plans in relation to animal health, including provisions on the protection of animals during depopulation for disease control		
Recommendation	Basis for assessment	Current Status
	sheep and goat pox have been updated and in April 2015 published; these are also available at: www.rijksoverheid.nl. CPs for vesicular stomatitis, epizootic haemorrhagic disease and Newcastle disease are under development, NVWA expects completing and publishing yet in 2016. NVWA provided drafts of these CPs. NVWA stated that in case of an outbreak of animal epizootic disease the CPs, including these at the draft stage, are sufficiently elaborated and can be effectively used.	
2013-6775-3 The competent authority should ensure that the relevant parts of contingency plans, operational manuals, work instructions and contracts with specialised companies are updated to include legal references to Article 18 of Regulation (EC) No 1099/2009.	This recommendation is based on conclusion in Section 5.5 and related findings in the Section of the audit report that although methods of killing are in compliance with Council Regulation (EC) No 1099/2009 and procedures are in place for the granting of derogation in very exceptional cases, further amendments are needed to contract specifications and work instructions for official and private staff to ensure that animal welfare requirements are met for the electrocution unit. In its response the competent authority stated that: a) As regards CPs: Incorporation of Regulation (EC) No 1099/2009 in the contingency plans will be addressed during the updates described in the proposed action for recommendation 2013-6776-1. b) As regards operation manuals / working instructions: All necessary amendments will be implemented when these manuals and instructions are redrafted (2013). Additionally a matrix	Closed due to action taken

Audit 2013-6775 of 28 January 2013 in order to evaluate the implementation of contingency plans in relation to animal health, including provisions on the protection of animals during depopulation for disease control		
Recommendation	Basis for assessment	Current Status
	will be developed including all chosen methods related to species/ type/ number of animals/ size of the outbreak. c) As regards contacts: All contracts are open for quotes, bids and renewal with a designated frequency. Legal references to Regulation (EC) No 1099/2099 will be included to every new or renewed contract where appropriate. All current contract parties receive a letter that draws their attention to the new Regulation. They are informed that (i) this Regulation came into force in January 2013, (ii) it might have some bearing on their activities and obligations (iii) the authority expect them to work within the boundaries of this legislation. Also all contract parties are annually invited by NVWA for a contact and training meeting. At the latest meeting, March 2013, one presentation was dedicated to this new Regulation and all contract parties received a copy of the Regulation. The authority assume these actions guarantee that all contract parties are adequately informed and additionally the NVWA will check if the contract parties do not infringe the Regulation during depopulation operations. During the 2016 GFA NVWA stated that it updated CP for notifiable diseases. Moreover, as a principle during an outbreak of a notifiable disease NVWA will install a commission supervising issues with respect to animal welfare during transport, culling, etc. Particular attention for the welfare issues is put in CPs for CSF/ASF, foot and mouth disease (FMD) and avian influenza (AI) and it applies to other notifiable diseases as well. References to the welfare issues can be found: a) the CP for CSF/ASF sections: 4.4.2.4, 7.21, 7.22, 8.3.2, 8.3.6, 8.5.1, 9.5.1, 9,6, 10.3.1.1, 11.2.3.4, 11.4.3, and 12.2.2.	

Audit 2013-6775 of 28 January 2013 in order to evaluate the implementation of contingency plans in relation to animal health, including provisions on the protection of animals during depopulation for disease control		
Recommendation	Basis for assessment	Current Status
	b) the CP for FMD sections: 4.5.2, 5.2, 7.19, 7.20, 8.3.1, 8.3.6, 8.5.1, 10.3.1, 11.2.1, 11.3 and 12.4.4. c) the CP for AI sections: 4.6.2.4, 5.4, 8.13, 8.21, 8.25 and 8.26. In 2013 NVWA contacted contracting parties involved, during the outbreak, in emergency animal killing. NVWA passed information on requirement of Regulation 1099/2009 and presented implication of the Regulation during culling activities. All new contracts with contractors contain provisions addressing animal welfare issues and requirements of the Regulation. NVWA amended operation instructions, check-list and organised training on these issues. NVWA provided copies of CPs for CSF/ASF, FMD and AI, copies of correspondence exchanged with the Ministry of Economy, and training materials used for training of the staff / operators involved in emergency killing of animals .	
2013-6775-4 The competent authority should make sure that the operation and construction of the electrocution system for pigs and the instructions for personnel operating and supervising the system are adequate to ensure that the key parameters of	This recommendation is based on conclusion in Section 5.5 and related findings in the Section of the audit report that animal welfare parameters are not met during operation of electrocution system for pigs and instructions for personnel operating and supervising the system are not adequate to avoid such situation. The audit report noted that during the audit NVWA took immediate action to improve situation and by the end of the audit NVWA presented preliminary working instruction to the audit team.	Closed due to action taken

Audit 2013-6775 of 28 January 2013 in order to evaluate the implementation of contingency plans in relation to animal health, including provisions on the protection of animals during depopulation for disease control		
Recommendation	Basis for assessment	Current Status
the method are met as detailed for method no. 2, Table 2, Chapter I of Annex I to Regulation (EC) No 1099/2009.	In its response the NVWA stated that it notifies relevant contractors on requirements concerning the use of electrocution systems while completing the action to address recommendation No. 2013-6775-3. Moreover, NVWA undertook to reflect the issue of electrocution system for killing pigs in OMs and WIs and in contracts. NVWA expects these measures to be completed by December 2013. During the 2016 GFA NVWA stated that instructions concerning delivery, maintenance and operation of electrocution units, and instructions, for the NVWA staff, received up-date and now contain appropriate information to ensure animal welfare during handling emergency situations. NVWA renewed the contract with provider of the stunning equipment as well as provided training, covering animal welfare aspects, for the contractor's staff. NVWA provided copies of up-dated instructions and correspondence with the contractor.	

Audit 2015-7564 of 09 November 2015 in order to evaluate the animal health control system in place for bodies, institutes or centres approved in accordance with Annex C of Council Directive 92/65/EEC		
Recommendation	Basis for assessment	Current Status
2015-7564-1 To ensure that an establishment maintains its approval only if the	This recommendation is based on conclusion from Section 5.4.2 (No.: 64 and 65) and related findings (No.: 17, 59, 60 and 63) of the audit report that: - Although NVWA has in place well organised system for official controls on approved body,	Closed due to action taken

Audit 2015-7564 of 09 November 2015 in order to evaluate the animal health control system in place for bodies, institutes or centres approved in accordance with Annex C of Council Directive 92/65/EEC		
Recommendation	Basis for assessment	Current Status
operator has demonstrated that it complies with the relevant provisions of Directive 92/65/EEC, particularly in accordance with point 2 of Annex C of this Directive. Based on conclusions (64) and (65), and associated findings (17), (59), (60), (62) and (63).	institute or centres (ABICs), deficiencies like no quarantine of incoming animals (one of ABICs) and incomplete approval documentation remained undetected. This undermines the overall system performance and in some situations may jeopardise ABIC health status. - Verification of ABICs compliance, in the means of audit, had not been effective, as one ABIC (importing non-human primates) maintained its approval without meeting the essential requirements of Directive 92/65/EEC. This increases the risk that some situations posing a health threat emerging from these imports and subsequent trade remain undetected or not contained in timely manner. In its response NVWA stated that: a) It began adjusting the surveillance plans for ABICs. In the plans NVWA will put particular attention to current animal disease risks and to diseases from Annex A. NVWA expects all the plans to be adjusted by the end of 2016. For these ABICs that are members of the Dutch Zoo Association (NVS), NVWA will consult the plan with the Association. b) It will revise the audit approach and put more emphasis on checks on arriving animals, their status and the ABICs' quarantine arrangements. NVWA expects this process to be completed and implemented by June 2016. c) Each year, it organises, annual 'inter-vision' meeting with approved veterinarians. d) It will up-date approval documents if an ABIC gets modification or conversion. Such document, including an ABIC revised plan will be included in the approval files. e) It will ad important information (e.g. the lack of quarantine facilities) to the ABICs	

Audit 2015-7564 of 09 November 2015 in order to evaluate the animal health control system in place for bodies, institutes or centres approved in accordance with Annex C of Council Directive 92/65/EEC		
Recommendation	Basis for assessment	Current Status
	overview published on the NVWA web page. If relevant, ABICs will receive a new approval document containing the additional information. f) The ABIC referred to in finding 63 of the audit report presented an action plan. NVWA has now approved that plan, and no new animals are allowed in until works on the quarantine facilities are completed. NVWA expects the works finish by the end of March 2016. During the 2016 GFA NVWA stated the following**:** Consultation took place in May 2016. As the result, NVS undertook to adjust the scope and schedule of the surveillance plans. NVWA provided a correspondence concerning this issue. The instruction for auditors was amended and now contains new elements allowing verification on arriving animals, their status and ABICs' quarantine arrangements. NVWA provided copy of the amended procedure. NVS agreed to discuss issues during the annual "inter-vision" meeting with ABICs, veterinarians and the NVWA inspectors. The meeting is going to take place in November 2016. Audit check-list received amendment (valid as of September 2016) and now contains questions on modification or conversion of ABIC. NVWA provided copy of the check-list. The list of ABICs in the Netherlands received modification and now contains information on the availability of quarantine facility. In addition, relevant stakeholders received letters indicating changes. NVWA presented copy of the list (also available on the web) and copies	

Audit 2015-7564 of 09 November 2015 in order to evaluate the animal health control system in place for bodies, institutes or centres approved in accordance with Annex C of Council Directive 92/65/EEC		
Recommendation	Basis for assessment	Current Status
	of the correspondence with the stakeholders. The ABIC with non-compliant quarantine facility, that was identified during DG SANTE audit, remedied the situation. In April 2016 NVWA carried out two on-the-spot visits and confirmed that all non-compliances have been corrected. As a consequence NVWA reinstated the ABIC's approval. NVWA presented correspondence issued in this respect.	
2015-7564-2 To verify that veterinarians employed by ABICs possess the knowledge and skills necessary for this particular field of animal health as required by Point 1 (g)(i) of Annex C to Directive 92/65/EEC. Based on conclusions (36) and (65), and associated findings (13) and (62).	This recommendation is based on conclusion from Sections 5.2.6 and 5.4.2 (No.: 36 and 65) and related findings (No.: 13 and 62) of the audit report that the competent authority supervision failed to detect number of serious non-compliances in ABIC operation and in work of approved veterinarian responsible for checks on imported primates. It leads to situation undermining credibility of the ABIC approval status. More importantly, this increases the risk that some situations posing a health threat emerging from these imports and subsequent trade remain undetected or not contained in timely manner. In its response NVWA stated that veterinarians employed by ABICs, indeed, have not been tested in a documented manner. Therefore, beginning from 2016, NVWA will include in the audit list a number of questions to assess the knowledge and skills of these veterinarians. During audit veterinarians would be asked about ZOOs' protocols and operating methods. NVWA presented modified list of issues to be covered during audit. During the 2016 GFA NVWA stated that, since July 2016, it uses a modified audit questionnaire with a number of points addressing the knowledge and skills of ABICs	Closed due to action taken

Audit 2015-7564 of 09 November 2015 in order to evaluate the animal health control system in place for bodies, institutes or centres approved in accordance with Annex C of Council Directive 92/65/EEC		
Recommendation	Basis for assessment	Current Status
	veterinarians (five points have been included to allow adequate assessment). During each annual audit ABIC veterinarians will be asked about ZOOs' protocols, new legislation and operating methods. NVWA presented modified list of issues to be covered during audit.	
2015-7564-3 To ensure that in case of suspicion of a disease listed in Annex A or B to Directive 92/65/EEC, the approval of the ABIC is suspended, and that the Commission is informed of suspension, withdrawal or restoration of approvals. Point 6 of Annex C to Directive 92/65/EEC. Based on conclusion (34), and associated finding (32).	This recommendation is based on conclusion from Section 5.2.6 (No.: 34) and related finding (No.: 32) of audit report that although the competent authority correctly restricted movement of susceptible animals during suspicion of notifiable disease in ABIC, it did not officially suspend the ABIC approval. In consequence information on the suspicion of the disease was passed neither to the Commission nor to other Member States. In its response NVWA stated that any suspicion of the disease listed in Annex A or B of the Directive 92/65/EEC will be notified, and this will trigger suspension of ABIC approval as long as the suspicion is ruled out or ABIC is declared free of disease. During the 2016 GFA NVWA stated that it has introduced changes in the document: "Roadmap to handle suspicions of animal diseases and zoonoses". Chapter 21 contains reference to notification procedure. According to the procedure the NVWA Incident and Crisis Centre immediately reports any suspicions to NVWA-TO Levend VEE (live animals team) and, depending on the disease, to the Dutch Chief Veterinary Officer who informs the Commission. NVWA-TO Levend VEE suspends the approval of the ABIC concerned if the disease listed in Annex A or B to the Directive is suspected. Once the suspicion is excluded	Closed due to action taken

Audit 2015-7564 of 09 November 2015 in order to evaluate the animal health control system in place for bodies, institutes or centres approved in accordance with Annex C of Council Directive 92/65/EEC		
Recommendation	Basis for assessment	Current Status
	or, in case of disease, ABIC is declared free the approval is granted again. NVWA presented copy of the AI disease handling document containing this new procedure (process ref. 1tm8) ensuring notification to the Commission about suspicion of the disease, withdrawal and restoration of the approval. In addition, it presented a copy of correspondence directed to the stakeholders affected by this procedure.	
2015-7564-4 To ensure that trade in non-human primates is restricted solely to animals consigned to ABIC. Article 5 of Directive 91/496/EEC. Based on conclusion (52), and associated finding (43).	This recommendation is based on conclusion from Section 5.3 (No. 52) and related finding No. 43 of the audit report that the Dutch authority allowed non-human primates to be traded from the Dutch ABIC to not-approved locations in another Member States (other than ABIC) if the competent authority of the destination place had issued an authorisation. In its response NVWA stated that as regards restricting the export of primates to other Member States (they may only be exported to ABICs), the NVWA amended its instructions and informed its veterinarians accordingly immediately after the audit. Points 3 and 4 of Annex C to the Directive will also be incorporated into national rules. It is expected that this will be done by the end of 2016. During the 2016 GFA NVWA stated that it amended instruction for "certification of other animals" by adding relevant provisions of Annex C of Directive 91/496/EEC (ref. 5.3.1.1). NVWA informed ABICs' managers on changes in the instruction and made instruction available at: https://www.nvwa.nl/onderwerpen/exportprocedures/dossier/export-dieren-dierlijke-	In Progress Post GFA

Audit 2015-7564 of 09 November 2015 in order to evaluate the animal health control system in place for bodies, institutes or centres approved in accordance with Annex C of Council Directive 92/65/EEC		
Recommendation	Basis for assessment	Current Status
	producten/honden-katten-overige-dieren NVWA presented copy of amended instruction. NVWA stated that the draft amendment to the national legislation, for the points 3 and 4 of Annex C of Directive, had been prepared and presented for review. NVWA expects the legislation to be in place in July 2017. **Assessment: In order to fully address this recommendation NVWA should present evidence that the national legislation adopting provisions of Points 3 and 4 of Annex C to Directive 91/496/EC has been implemented.**	
2015-7564-5 To ensure approval of appropriate annual disease surveillance plans (demonstrating absence of the diseases referred to in Annexes A and B in relation to the disease situation of the country) applied in ABICs. Point 1 (g)(ii) of Annex C to Directive 92/65/EEC. Based on conclusion (33), and associated findings (14) and (15).	This recommendation is based on the conclusion from Section 5.2 (No. 33) and related findings (No. 14 and 15) of the audit report that some ABICs had in place the disease surveillance plans that could not provide clear evidence of absence of notifiable diseases. In consequence this caused some uncertainty in relation to the health status of the ABICs (particularly for asymptomatic carriers). In its response NVWA stated that it began adjusting the surveillance plans for ABICs (see answer to recommendation 2015-7564-1). Moreover, while assessing the surveillance plans, beside the general health requirements, inspectors will carry out additional checks on diseases listed in Annex A and B of the Directive. Besides the annual approval of the plans, NVWA will put pay attention if plans receive instant update if there is any risk of animal diseases. During the 2016 GFA NVWA stated that it modified the scope of audits (see answer to	In Progress Post GFA

Audit 2015-7564 of 09 November 2015 in order to evaluate the animal health control system in place for bodies, institutes or centres approved in accordance with Annex C of Council Directive 92/65/EEC		
Recommendation	Basis for assessment	Current Status
	recommendation No. 2015-7564-1) and it will now assess if surveillance plans comply with requirements of the Directive (diseases listed in Annex A and B). NVWA presented modified list of issues to be covered during audit. NVWA indicated that discussion is on-going with NVS as regards surveillance plans issue. Currently ABICs have not yet adopted plans to include surveillance of certain animal diseases (i.e. Bluetongue and Avian influenza). NVS intends to develop standard model surveillance plan for all ABICs. It is expected that this work will be finished in 2017. NVWA instructed auditors to put more attention to surveillance plans during the 2017 audits and allocated more time to verify this issue. NVWA expects to complete approval of the plans by the end of 2017. **Assessment: In order to fully address this recommendation NVWA should present evidence that ABICs have in place approved annual disease surveillance plans.**	
2015-7564-6 To ensure adequate checks on animals of non-harmonised species subject to national animal health conditions, imported from third countries through border inspection	This recommendation is based on the conclusion in Section 5.4 (No. 66) and related finding (No. 63) of the audit report that the system for import controls of the health requirements for live non-harmonised animal species does not ensure that the conditions required by the Netherlands are effectively controlled if such animals are introduced through a BIP in another Member State. In its response NVWA stated that it will inform other Member States, on the national import	Closed due to action taken

Audit 2015-7564 of 09 November 2015 in order to evaluate the animal health control system in place for bodies, institutes or centres approved in accordance with Annex C of Council Directive 92/65/EEC		
Recommendation	Basis for assessment	Current Status
posts in another Member State. Article 4 of Directive 91/496/EEC. Based on conclusion (66), and associated finding (63).	health requirements for animals of non-harmonised species. The message contain information on the types of certificates required, thus conditions, for non-harmonised species (non-mammals, mammals other than primates, and primates) that need to be met for import to the Netherlands. During the 2016 GFA NVWA stated that in July 2016 it sent to veterinary services of other Members States an e-mail containing reference to NVWA web-page presenting import requirements for non-harmonised species. NVWA presented copy of the correspondence.	

2.B.2 Food of animal origin

Audit 2011-6008 of 16 November 2011 in order to evaluate the food safety control systems in place governing the production and placing on the market of poultry meat and poultry meat products		
Recommendation	Basis for assessment	Current Status
2011-6008-2 The CA should ensure that EU requirements on ante-mortem inspection are respected, in particular those described in part B	This recommendation is based on conclusion in Section 5.3.3 and related findings in the Section of the audit report that official auxiliary (OA) performs ante-mortem inspections in case official veterinarian (OV) is not present. Moreover, ante-mortem inspection is not carried out for all birds (truckloads) arriving to slaughterhouses.	Closed for other reasons

Audit 2011-6008 of 16 November 2011 in order to evaluate the food safety control systems in place governing the production and placing on the market of poultry meat and poultry meat products		
Recommendation	Basis for assessment	Current Status
(1a) Chapter II Section I and in part A (6) Chapter V Section IV, of Annex I to Regulation (EC) No 854/2004.	During the 2013 GFA NVWA explained that OVs recruitment in poultry slaughterhouses is on-going. NVWA investigated the necessary increase of OVs in poultry slaughterhouses for ante- and post-mortem inspections and came up with estimation of six additional OVs. NVWA drafted for the management the proposal to recruit these OVs; NVWA expected the management decision to be taken in September 2013. According to NVWA in 2012 the presence of OVs in slaughterhouses increased from 62.1% to 68.8%. NVWA expects to resolve the major part of the OVs shortage in 2014. *Assessment: The new legislative requirements on ante and post-mortem inspection, to be discussed with the Member States under the secondary legislation in the context on the recently adopted regulation on Official Controls, could influence the follow-up to be given to this recommendation. Consequently, the follow-up is suspended pending the final result of the revision of the rules in this area.*	
2011-6008-3 The CA should ensure that EU requirements on official supervision of post-mortem inspection are respected, in particular those described in Part A (a) Chapter III Section III and Part B (1b) Chapter V, Section IV, Annex I of Regulation (EC) No 854/2004.	This recommendation is based on conclusion in Section 5.3.3 and related findings in the Section of the audit report that in some situations the slaughterhouse staff perform post-mortem inspection with no supervision of OVs. During the 2013 GFA NVWA explained that OVs recruitment in poultry slaughterhouses is on-going. NVWA investigated the necessary increase the number of OVs in poultry slaughterhouses for ante- and post-mortem inspections and came up with estimation of six additional OVs. NVWA drafted for the management the proposal to recruit these OVs; NVWA expected the management decision to be taken in September 2013.	Closed for other reasons

Audit 2011-6008 of 16 November 2011 in order to evaluate the food safety control systems in place governing the production and placing on the market of poultry meat and poultry meat products		
Recommendation	Basis for assessment	Current Status
	According to NVWA in 2012 the presence of OVs in slaughterhouses increased from 62.1% to 68.8%. NVWA expects to resolve the major part of the OVs shortage in 2014. *Assessment: The new legislative requirements on ante and post-mortem inspection, to be discussed with the Member States under the secondary legislation in the context on the recently adopted regulation on Official Controls, could influence the follow-up to be given to this recommendation. Consequently, the follow-up is suspended pending the final result of the revision of the rules in this area.*	
2011-6008-10 The CA should ensure that, when non-compliances are identified during official controls, these are followed-up and that effective enforcement actions are taken, as required by Article 54 and 55 of Regulation (EC) No 882/2004. In particular, sanctions shall be dissuasive.	This recommendation is based on conclusion in Section 5.3.4 and related findings in the Section of the audit report that deficiencies and other non-compliances which had been detected and recorded during official controls were not adequately followed up or enforced. This resulted in situations where one year later these deficiencies / non-compliances were still present in establishments and not corrected. During the 2013 GFA NVWA stated that in order to improve effectiveness of official controls, in April 2012 it amended the project description in relation to system-audits and system-inspections. In addition, the control lists for system-audits and system-inspections have new questions that relate to measures to be taken by the inspector. In control list sections 341, 344 and 345, the inspectors have to indicate the necessary measures. Problems in relation to implementing intervention policy were still present and NVWA expect to finalise the action by the end of 2013 (see also recommendation 2011-6019-5). In its further up-date (December 2013) NVWA stated that it undertook the following measures	Closed for other reasons

Audit 2011-6008 of 16 November 2011 in order to evaluate the food safety control systems in place governing the production and placing on the market of poultry meat and poultry meat products		
Recommendation	Basis for assessment	Current Status
	to improve the effectiveness of official controls in the Veterinary and Import Division (V&I): a) The method to have short time actions related to important subjects will be continued. b) In the period of November/December 2013 there will be a short time action related to faecal contamination in medium- and small- sized slaughterhouses red meat. During this action the results will come directly in the ISI database. c) From the side of the management and the Department of Supervision there will be a check if the inspectors of the NVWA follow the scheme as described in the project. If necessary, more assistance will be given how to make a report for a penalty. NVWA presented description of this action. d) The same action will take place in 2014; this time however, aimed at big-sized red meat slaughterhouses. In 2014 it will be decided which additional short-time actions will take place; in any case short time actions related to animal by-products will be organised and also a short time action related to cleaning and disinfection of the area where live animals are arriving in the slaughterhouse. The intervention strategy in V&I will restart with a monthly meeting with the several responsible employees of the NVWA to have a strong intervention for the weakest establishments in the veterinary area. These meetings stopped after the reorganisation of 2012. The action plan has been updated for the coming regular meetings. During this meeting also the responsible officials within the field will take part in these meetings in order to implement	

Audit 2011-6008 of 16 November 2011 in order to evaluate the food safety control systems in place governing the production and placing on the market of poultry meat and poultry meat products		
Recommendation	Basis for assessment	Current Status
	the correct interventions. The plan for these meetings is in the annex. NVWA put n place more administrative supervision in cold stores with well-trained auditors in this field; so called EDP-auditors. A plan has been made in order to have a risk-based supervision in 2014 in EU approved cutting plants and cold stores. The supervision will be more focussed on the weak plants. *Assessment: The issue of follow-up and enforcement on non-compliances identified during official controls was identified also in two other audit reports (2011-6019 and 2012-6367). For that reason this recommendation is "Closed for other reasons" and will be followed together with the most recent recommendation No. 2012-6367-4 covering these issues.*	

Audit 2011-6019 of 12 September 2011 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular meat, minced meat, meat preparations, meat products and casings		
Recommendation	Basis for assessment	Current Status
2011-6019-4 The CA should ensure that procedures for post-mortem inspections are amended and brought into line with the requirements of Regulation (EC) No 854/2004.	This recommendation is based on conclusion in Section 5.2.and related findings in the section of the audit report that post-mortem examination of bovine and pig carcasses was not carried out in line with the requirements of Regulation (EC) No 854/2004. Namely at the time of the audit procedures for this examination did not contain provisions for palpation and, if necessary, incision of the mesenteric and gastric lymph nodes of swine and bovine carcasses. In its initial response NVWA stated that it will update the procedures related to post-mortem	Closed due to action taken

Audit 2011-6019 of 12 September 2011 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular meat, minced meat, meat preparations, meat products and casings		
Recommendation	Basis for assessment	Current Status
	examination and introduce some measures to ensure that staff in charge apply the examination in uniform manner. During the 2013 GFA NVWA stated that the Commission is reviewing the meat inspection system of porcine animals, including post-mortem inspections. The new proposed legislation, which will come into force in 2014, prescribes the visual inspection, also for mesenteric and gastric lymphnodes. Regarding the palpation and incision of mesenteric and gastric lymphnodes of bovine animals, Regulation (EC) No 1244/2007 provides flexibility, where the possibility is described for visual inspection of calves, younger than 8 months. NVWA confirmed that for calves discussions with the industry are on-going and results expected in September 2013. NVWA will also follow closely the discussion at EU level regarding the modernisation of the meat inspection of bovine animals older than 8 months. *Remark: This recommendation concerns the procedures for post-mortem inspections that NVWA undertook to amend also in response to recommendation concerning the health marking (see recommendation No. 2011-6019-6).* During the 2016 GFA NVWA stated that post-mortem inspection of pigs and bovine animals is in line with the EU requirement and , in particular, endorses provisions of the Regulation (EC) No. 219/2014. Following these provisions, the routine post-mortem examination of pigs' carcasses comprises visual inspection of the gastro-intestinal if any, the mesentery, the gastric and mesenteric lymph nodes (Lnn. gastrici, mesenterici, craniales and caudales). Depending on the identified	

Audit 2011-6019 of 12 September 2011 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular meat, minced meat, meat preparations, meat products and casings		
Recommendation	Basis for assessment	Current Status
	risks, the additional post mortem inspection may include palpation and, if necessary, incision of the gastric and mesenteric lymph nodes. For young bovine animals NVWA follows provisions lay down in Annex VI B to Regulation (EC) No 1244/2007 stating that by way of derogation from the specific requirements of Chapters I and II of Section IV of Annex I to Regulation (EC) No 854/2004, the post-mortem inspection for young bovine, ovine and caprine animals may be reduced to a visual inspection with limited palpation, provided that the post-mortem inspection of young bovine animals includes at all times palpation of the retropharyngeal, bronchial and mediastinal lymph nodes. NVWA stressed that t he mesenteric and gastric lymph nodes are not listed. The above reflects also the European Food Safety Authority (EFSA) Scientific Opinion that: *(...) palpation and incision, as used in current post-mortem inspection should be omitted, in the case of bovine animals subjected to routine slaughter, because these procedures do not add to the identification and control of the high-priority bovine meat-borne hazards and may increase their spreading and cross-contamination (...)*.	
2011-6019-5 The CA should ensure that official controls carried out to verify FBO's compliance with the general and specific hygiene requirements, and audits on HACCP-based procedures, as required by Article 4 of Regulation (EC) No 854/2004, are	This recommendation is based on conclusion in Sections 5.2.1 and 5.2.2 and related findings in these Sections of the audit report that official controls: a) were inadequate to ensure that food business operators (FBOs) comply with the general and specific hygiene requirements. In particular official controls failed to detect a number of deficiencies or, if detected them, did not ensure their correction. b) in general, failed to identify deficiencies in design and implementation of hazard analyses and critical control points (HACCP) based procedures. In some cases official controls	Closed due to action taken

Audit 2011-6019 of 12 September 2011 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular meat, minced meat, meat preparations, meat products and casings		
Recommendation	Basis for assessment	Current Status
effective.	identified these deficiencies but did not ensure their correction and proper implementation. During the 2013 GFA NVWA stated that, in April 2012, it changed inspection process and introduced some new questions relating to measures to be taken and follow-up. In brief, inspectors will have to record: a) the nature of shortcomings and the deadline for their removal, b) person in charge of follow-up inspection, and c) the type of warning given to operator (verbal, written, penalty report, written report, etc.) NVWA internal auditors evaluated 330 system-audit and 452 system-inspection reports and concluded that in general only in 15% of cases reports contained required information. NVWA planned further investigations to establish the reasons for such situation. NVWA also planned to organise, in 2013 and 2014, training session for inspectors as measures in case of non-compliance. In its additional clarification (December 2013) NVWA indicated that V&I will undertake the following: a) A short time action related to faecal contamination in medium- and small- sized slaughterhouses red meat in the period of November/December 2013. Similar action will take place in 2014 in the big-sized red meat slaughterhouses. NVWA will provide necessary assistance in the area of penalties, if needed. b) In 2014 it will be decided which additional short-time actions will take place; in any case short time actions related to animal by-products will be organised and also a short time action related to cleaning and disinfection of the area where live animals are arriving in the slaughterhouse.	

Audit 2011-6019 of 12 September 2011 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular meat, minced meat, meat preparations, meat products and casings		
Recommendation	Basis for assessment	Current Status
	V&I will restart a monthly meeting with the several responsible employees of the NVWA to have insight on the weakest establishments in the veterinary area. c) Developed the 2014 plan for risk-based supervision in EU approved cutting plants and cold stores; with focus on weak performing establishments. During the 2016 GFA NVWA stated that, since 2014, NVWA introduced a new model for controls on meat establishments (slaughterhouses, processing and cutting plants, cold stores). General and specific hygiene requirements (e.g.: animal welfare provisions, areas of specific risk, disinfection, cleaning of means of transport, slaughter hygiene, temperature controls, handling of animal by-products and traceability) are factors for profiling of each establishment. Central database uses the history of compliance for comparison between slaughterhouses. It allows also for monitoring of measures imposed and actions undertaken for correcting of non-compliance. NVWA developed procedures allowing for registering all factors and actions in case of non-compliance. For each risk area, NVWA developed specific check-lists. Enforcement measures undertaken in the risk areas determine the frequency of controls. Other factors, e.g.: the species to be slaughtered also are taken into account. Regardless of the results obtained, poorly performing establishments receive priority for audits. NVWA developed specific check-lists for collecting information during controls; the information, subsequently, is recorded in the database. The information serves during	

Audit 2011-6019 of 12 September 2011 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular meat, minced meat, meat preparations, meat products and casings		
Recommendation	Basis for assessment	Current Status
	planning process for introducing re-inspections to verify implementation of corrective measures.	
2011-6019-6 The CA should ensure that post mortem inspections are carried out in accordance to the requirements laid down in Annex I, Section I, Chapter II(D) and Section IV, Chapters I and IV, to Regulation (EC) No 854/2004, and that health marking is performed only when there are no grounds for declaring the meat unfit for human consumption, as required by point 2(a) of Chapter II of Annex I to Regulation (EC) No 854/2004.	This recommendation is based on conclusion in Section 5.2.8 and related findings in the Section of the audit report that carcasses bear the health mark suggesting their fineness for human consumption while post-mortem examination (bovine) and examination for the presence of *Trichinella* (pigs) had not been completed yet. In its response NVWA stated that it would implement procedures ensuring that health mark is put on carcass only when there are no grounds for declaring meat unfit for human consumption. NVWA expected this to be in place from April 2012. An external audit to verify implementation of this measure will be included in 2012 audit programme. *Assessment: This recommendation concerns the procedures for post-mortem inspections that NVWA undertook to amend also in response to recommendation concerning post-mortem examination (palpation and incisions of the mesenteric and gastric lymph nodes) of bovine and pig carcasses (see recommendation No. 2011-6019-4).* During the 2016 GFA NVWA stated that it implemented a procedure and monitoring protocol covering application of the health mark on carcasses. According to these documents, the Animal Sector Quality Inspection Foundation - KDS staff apply the health mark in only in situations that comply with provisions lay down by: - Point 2a of Chapter III of Section I of Annex I of Regulation (EC) No. 854/2004,	Closed due to action taken

Audit 2011-6019 of 12 September 2011 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular meat, minced meat, meat preparations, meat products and casings		
Recommendation	Basis for assessment	Current Status
	- Article 2.3 of Regulation (EC) No 1375/2015 and, - Annex III, Chapter A, point 6 of Regulation (EC) No 999/2001 (concerns bovine). NVWA staff, at random, verify and record if only eligible carcasses bear the health mark. NVWA provided copy of the procedure and monitoring protocol.	
2011-6019-10 The CA should ensure that, when non-compliances are identified during official controls, these are followed-up and that effective enforcement actions are taken, as required by Article 54 of Regulation (EC) No 882/2004.	This recommendation is based on conclusion in Sections 5.5.2.1, 2.2, and 5.2.10 and related findings in the Section of the audit report that official controls reports did not contain information on: a) long-standing non-compliances, b) required remedial action, c) the deadline for corrective measures to be undertaken. These all substantially affect the effectiveness of monitoring whether operators correct situation and eliminate non-compliances or not. In its initial response NVWA expressed intention to improve situation but did not present detailed description of the measures to be undertaken. During 2013 GFA NVWA stated that it made some changes in the process to system-audits and system-inspections and introduced in controls lists some new questions where inspectors have to indicate the necessary measures to be undertaken by operators to remedy situation (see the NVWA response to recommendation No. 2011-6008-10). NVWA expected to finalise the action by the end of 2013. In its additional clarification (December 2013) NVWA indicated that V&I will undertake the following: a) A short time action related to faecal contamination in medium- and small- sized	Closed for other reasons

Audit 2011-6019 of 12 September 2011 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular meat, minced meat, meat preparations, meat products and casings		
Recommendation	Basis for assessment	Current Status
	slaughterhouses red meat in the period of November/December 2013. Similar action will take place in 2014 in the big-sized red meat slaughterhouses. NVWA will provide necessary assistance in the area of penalties, if needed. b) In 2014 it will be decided which additional short-time actions will take place; in any case short time actions related to animal by-products will be organised and also a short time action related to cleaning and disinfection of the area where live animals are arriving in the slaughterhouse. V&I will restart a monthly meeting with the several responsible employees of the NVWA to have insight on the weakest establishments in the veterinary area. c) Developed the 2014 plan for risk-based supervision in EU approved cutting plants and cold stores; with focus on weak performing establishments. During the 2016 GFA NVWA stated that it developed a new intervention policy that NVWA implements in case of violation of legislation, identified during official controls and through non-compliant test results. The intervention policy provides a guide for a number of administrative measures to be applied in case of non-compliance. It provides also differentiation between different types of non-compliance. NVWA provided copy of the intervention policy, and contamination protocols for *E.coli* and Shiga toxin-producing *E.coli*. *Assessment: The issue of follow-up and enforcement on non-compliances identified during official controls was identified also in two other audit reports (2011-6008 and 2012-6367). For that reason this recommendation is "Closed for other reasons" and will be followed*	

Audit 2011-6019 of 12 September 2011 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular meat, minced meat, meat preparations, meat products and casings		
Recommendation	Basis for assessment	Current Status
	together with the most recent recommendation No. 2012-6367-4 covering these issues.	

Audit 2012-6358 of 03 September 2012 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular milk and dairy products		
Recommendation	Basis for assessment	Current Status
2012-6358-1 To ensure that the official controls carried out to verify industrial scale dairy establishments' compliance with the general and specific hygiene requirements and audits on HACCP-based systems are implemented regularly and with appropriate frequency, as required in Article 3.1 of Regulation (EC) No 882/2004.	This recommendation is based on conclusion in Section 5.1.9 and related finding in the Section of the audit report that the frequency of official controls do not match with planned arrangement for large scale dairy establishments. In their response, the Netherlands Controlling Authority for Milk and Milk Products (COKZ) stated that as far as it is feasible (taking into account the number of some fluctuations in the status of establishments) it will follow the frequency for official controls in dairy establishments, established in annual control programme. During the 2016 GFA COKZ presented the number of controls carried out in milk establishments; these were the following: - in 2014: planned 154, carried out 173; - in 2015: planned 172, carried out 153. COKZ stated that in the first 8 months of 2016 there were less controls than planned but the target will be met by the end of the year. Every four months COKZ presents to NVWA a	Closed due to action taken

Audit 2012-6358 of 03 September 2012 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular milk and dairy products		
Recommendation	Basis for assessment	Current Status
	performance report by which NVWA monitors the progress in controls and sampling carried out at milk establishments. In case of deviation COKZ must explain the reason for, and proposed corrective actions. To monitor general situation in the sector and results of official controls COKZ meets with NVWA every two or three weeks. COKZ explained that all controls are planned on a risk base and, between the others, take into account the history of compliance with hygiene requirements. Discrepancies between the numbers planned and finally obtained are due to the following: a) temporary suspension of activity, b) complete cessation of activity, and c) establishment was in a process of correcting deficiencies and the deadline for correction and re-control did not elapsed. COKZ provided copies of control plans for 2014 and 2015 and respective annual (performance) reports (for 2014 and 2015) on implementation of these plans.	
2012-6358-3 To ensure that the official controls on potable water cover the the requirements of Council Directive 98/83/EC.	This recommendation is based on conclusion in Section 5.2.1 and related findings of the audit report that official controls do not verify if operators carry out their own checks on potable water with appropriate frequency and cover all factors (namely in establishments using solely municipal water operators do not check for pesticides and heavy metals). In its response COKZ stated that requirements of Council Directive 98/83 are implemented in the Dutch legislation - the Drinking Water Decree of 23 May 2011. All micro-organisms and chemical residues listed in the Directive are monitored in drinking water all over the country. This monitoring plan doesn't only include water testing as delivered from the source but also testing of samples collected from the distribution system and collective water delivery systems in large scale production plants. The Ministry of Infrastructure and the Environment is	Closed due to action taken

Audit 2012-6358 of 03 September 2012 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular milk and dairy products		
Recommendation	Basis for assessment	Current Status
	responsible for supervision. From beginning of 2013 onward, extra attention will be given by COKZ to operators own-checks for microbiological parameters at taps within the establishments. During the 2016 GFA COKZ stated that the quality of potable water is tested regularly and provided examples of such tests results. NVWA stated that in the past the National Institute for Public Health and the Environment (RIVM) carried out extensive checks on the quality of potable water. The checks resulted in conclusion that: "Potable water was of good quality. In 16 % of checked locations (production sites) results exceed the standards. Nonetheless, this under no circumstances constituted a threat to public health." According to the report a large proportion of the non-compliant samples were accounted for by a single incident and related to substances not causing a threat to public health, (e.g.: presence of iron and manganese). In one case standard for pesticides at pumping station exceeded the norm. Results demonstrated compliance of pumping stations with indicators for contamination by pathogenic micro-organisms. These indicators were the limits in the distribution network. However, in all cases, bacteria were present short time and did not give rise to any health problems. Nonetheless, in these locations, occupants of nearby households received advice to boil the water before use. In 2013 NVWA developed a potable-water policy (201307) for the use of drinking water by food business operators. According to the policy operators can use for production purpose only water from the official public water system, as this provides quality guarantees. If operators for operation use water stored in tanks or complex distribution system they are obliged to demonstrate that the quality of the water used complies with the Drinking Water Decree or otherwise meet the conditions of the Council Directive 98/83. In such cases	

Audit 2012-6358 of 03 September 2012 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular milk and dairy products		
Recommendation	Basis for assessment	Current Status
	operators should be able to demonstrate the quality of water by analytical results of own-check controls. Following the NVWA policy COKZ developed an internal inspection check-list covering verification of potable water quality. NVWA provided copy of the RIVM report and the potable water policy (201307). COKZ provided copy of the policy and the check-list.	
2012-6358-4 To ensure that the animals on milk and colostrum production holdings are subject to official controls to verify that the health requirements for raw milk and colostrum production, and in particular the health status of the animals and the use of veterinary medicinal products are being complied with, as required in point 1 of Chapter I, Annex IV to Regulation (EC) No 854/2004.	This recommendation is based on conclusion in Section 5.2.5 and related findings of the audit report that private veterinary practitioners, and not officials, carry out at dairy farms controls on milk and colostrum to verify if these comply with health requirements, and on the use of veterinary medicinal products (VMPs). This causes a risk that a veterinarian administrating veterinary products to animals is responsible for the check on their use. In its response COKZ stated that it will improve the system for official controls at dairy farms of the health status of animals and the use of veterinary drugs. By the end of 2013 the specific requirements for official approval of those veterinarians who have been already involved in the controls would be agreed between COKZ and NVWA; private veterinarians will be approved and listed. From January 2014 COKZ would verify the work of approved veterinarians in a means of audits. During the 2016 GFA COKZ stated that additional registration of private veterinarians is not necessary as those running their practices are registered according to the national legislation	Closed due to action taken

Audit 2012-6358 of 03 September 2012 in order to evaluate the follow-up action taken by the competent authorities with regard to official controls related to the safety of food of animal origin, in particular milk and dairy products		
Recommendation	Basis for assessment	Current Status
	(the Animals Act). Veterinarians approved by COKZ carry out, four times a year, checks on health requirements at farms. Once a year, COKZ carries out system inspection aimed at dairy farms. In addition COKZ introduced on farm audits with aim of assessing the veterinarians' work as regards prescription, the use of veterinary medicines and keeping respective records. NVWA presented an extract from COKZ annual report summarising auditing activity. According to this information, in 2015 COKZ carried out ten on-the-spot assessments on health status of cows and checks on private veterinarians in charge of the administration of veterinary medicines. The annual report contains information on the situation and a description of non-conformities identified. NVWA presented also an example of the assessment made during one on-the-spot visit. Both COKZ and NVWA stated that the above mentioned checks will be continued.	

Audit 2012-6367 of 26 November 2012 in order to evaluate the control system in place governing the production of mechanically separated meat		
Recommendation	Basis for assessment	Current Status
2012-6367-1 The Competent Authority should ensure that when carrying out official controls, the review of	This recommendation is based on conclusion in Section 5.3.1 and related findings of the audit report that although the Dutch authority has in place a system for approval of establishments it does not react (modify the approval) when operators change activities or these cannot be longer carried out due to alternation in infrastructure, equipment, etc., thus approval conditions are no longer met. These issues had been already indicated in audit reports	Closed due to action taken

Audit 2012-6367 of 26 November 2012 in order to evaluate the control system in place governing the production of mechanically separated meat		
Recommendation	Basis for assessment	Current Status
approval conditions is accurate and appropriate action is taken when the conditions are not met, as required by Article 31 of Regulation (EC) No 882/2004.	DG(SANCO)/2011-6008 and DG(SANCO)/2011-6019. In its reply NVWA stated it will incorporate verification on approval conditions in mechanically separated meat (MSM) producing establishments in the annual audit and inspection program as NVWA has no extra capacity available to perform these actions separately. Specific approvals, under which activities no longer are or never were carried out, would be withdrawn. After the audit NVWA updated procedure on this issue and inspectors received directions. During the 2016 GFA NVWA stated that version 3. of the project protocol "Food Industrial Production 2013", by the C&V Division, contains a paragraph referring to approvals granted for companies. The paragraph states that in each approved plant a verification, to check that if the activities on-the-spot match these from the approval, should be carried out at least once a year. Inspectors started with these verifications in 2013. NVWA stated that from approximately 130 establishments initially present on the list, currently only 25 - 30 remain, and the list of these is available on the NVWA web page. NVWA provided copy of the project protocol.	
2012-6367-2 The Competent Authority should ensure that the listing of approved establishments is kept up-to-date, as required by Article 31(2) of Regulation (EC) No 882/2004.	This recommendation is based on conclusion in Section 5.3.1 and related findings of the audit report that although the Dutch authority has in place a system for approval of establishments the list of approved establishments is not up-to-date. In its response NVWA stated that it is going to address this issue while taking measures to recommendation 2012-6367-1. Moreover, procedures to keep the list up-to- date have already	Closed due to action taken

Audit 2012-6367 of 26 November 2012 in order to evaluate the control system in place governing the production of mechanically separated meat		
Recommendation	Basis for assessment	Current Status
	been implemented. During the 2016 GFA NVWA stated that it introduced a form that during official controls in establishments is handed over to operators. The operator has a chance to fill the form for withdrawal of approval for the activities that no longer take place. NVWA collects filled forms and, weekly, up-dates the list of establishments producing MSM. NVWA presented a procedure and the updated form.	
2012-6367-3 The Competent Authority should ensure that the effectiveness of official controls as required by Article 4(2)(a) of Regulation (EC) No 882/2004 is improved, so that deficiencies concerning general hygiene requirements, Hazard Analysis Critical Control Points based procedures and specific requirements for mechanically separated meat production are detected.	This recommendation is based on conclusion in Section 5.3.2 and related findings in the Section of the audit report that although official controls in establishments producing MSM were overall adequate, the Dutch authority failed to enforce certain requirements and to identify some deficiencies concerning general hygiene requirements, HACCP-based procedures and specific requirements for MSM production. In its response NVWA undertook the following: a) By November 2013, to evaluate the intervention policy (more dissuasive if necessary) and implement (January 2014) necessary changes. b) To consider the increase of the inspection frequency in areas were necessary (risk based approach) - included in the 2014 annual control plan. c) To consider additional training and/or instruction of food inspectors; if necessary implementation in the regular cycle of annual trainings.	Closed due to action taken

Audit 2012-6367 of 26 November 2012 in order to evaluate the control system in place governing the production of mechanically separated meat		
Recommendation	Basis for assessment	Current Status
	d) To carry out in 2014 internal audit on food inspectors to ensure a high quality of official controls. During the 2016 GFA NVWA stated that it undertook the above-mentioned actions, improving the effectiveness of official controls, also to address recommendations 2011-6008-10 and 2011-6019-10 and, to some extent, recommendation 2012-6367-3. NVWA stated that: ad. a) Evaluation of intervention policy resulted in put in place a general intervention policy available on internet (see recommendation 2012-6367-4). ad. b) The evaluation of inspection frequency takes place every year during preparation of control programme for the following year. The inspection frequency depends of the type of establishment. Establishments poorly performing in the past receive higher frequency of visits. ad. c and d) The internal audit to verify the quality of official controls and its uniformity took place at the end of 2013. The audit identified a number of shortcomings, between the others: lack of compliance with written procedures, vague recording of finding and non-coherent application of administrative measures. NVWA communicated t he audit results to inspectors and organised training focussing of identified issues. In addition NVWA in 2013 carried out research on MSM producing establishments to establish whether the situation concerning microbiological sampling and labelling has improved in comparison with 2012 or not. The research report concluded on: a) compliance of operators using MSM with labelling requirements, b) the quality and age of raw materials used for production of MSM, c) hygiene during production, d) compliance with requirements for microbiological own-checks by operators, and e) information available to the customers purchasing MSM on analytical results for the presence of *Salmonella*. The report contains recommendations for remedy of situation. NVWA stated that it discussed the	

Audit 2012-6367 of 26 November 2012 in order to evaluate the control system in place governing the production of mechanically separated meat		
Recommendation	Basis for assessment	Current Status
	recommendations of the research reports with its own staff and the food sector representatives. Between 2013 and 2015 NVWA organised a number of general training sessions for inspectors in charge of controls food of animal and non-animal origin. Some of them covered also MSM issues, including its labelling and microbiology. NVWA presented copy of the 2013 internal audit report and copy of the MSM research report.	
2012-6367-4 In order to comply with the European Union requirements, the Competent Authority should ensure that deficiencies found are corrected in the establishments visited and are not present in other approved establishments (Article 54 of Regulation (EC) No 882/2004).	This recommendation refers to conclusion from Section 5.3.2 and related findings in the Section of the audit report that although official controls in establishments were overall adequate, the Dutch authority failed to timely follow-up and to enforce certain requirements, and to identify some deficiencies concerning general and some specific hygiene requirements. *Remark: The issue of follow-up and enforcement on non-compliances identified during official controls had been identified also in two other audit reports: 2011-6008 and 2011-6019. For that reason recommendations No.: 2011-6008-10 and 2011-6019-10 are followed together with this recommendation. Thus the action plan presented by NVWA and measures taken in order to address this recommendation will serve also to address the two earlier recommendations.* In its response NVWA stated that it would address this recommendation while adopting the measures to address recommendation 2012-6367-3. As this is systemic issue equal deadlines will apply. In its response to recommendations 2011-6008-10 and 2011-6019-10, NVWA undertook to introduce a check on the effectiveness of inspectors work and provide an assistance on how to	Closed due to action taken

Audit 2012-6367 of 26 November 2012 in order to evaluate the control system in place governing the production of mechanically separated meat		
Recommendation	Basis for assessment	Current Status
	make reports for penalties as well as provide additional training for the staff in charge of official controls and follow-up. During the 2016 GFA NVWA stated that, in June 2016, it put in place a general intervention policy communicated via intranet and available at: https://www.nvwa.nl/onderwerpen/dieren-dierlijke-producten/dossier/interventiebeleid/interventiebeleid-import-dieren-en-producten-van-dierlijke-oorsprong The new policy foresees one warning prior the penalty action would take place. The previous policy allowed for two or three warnings prior application of administrative sanctions. Inspectors received information on how to act and where to find support, if needed. NVWA intends to implement additionally also a sector-specific intervention policy by 2017; the preparatory work has started**.**	
2012-6367-5 The Competent Authority should ensure that the provisions of Directive 2000/13/EC concerning the indication of the presence of mechanically separated meat and of other ingredients in meat products and in meat preparations are enforced, as well as the requirements	This recommendation refers to conclusion from Sections: 5.2 and 5.3.6 and related findings in these Sections of the audit report that the position taken by the Dutch Ministry of Health, Welfare and Sport not to declare the presence of MSM on the product label for final consumers breaches provisions of Directive 2000/13/EC concerning labelling and of Article 16 of Regulation (EC) No 178/2002 (stating that labelling shall not mislead consumers). In its initial response NVWA stated that it would wait for the advice from EFSA on categorisation of MSM production and interpretation of the criteria. Until then it would not take the action.	Closed for other reasons

Audit 2012-6367 of 26 November 2012 in order to evaluate the control system in place governing the production of mechanically separated meat		
Recommendation	Basis for assessment	Current Status
concerning labelling of meat preparations containing mechanically separated meat laid down in Chapter IV, Section V, Annex III to Regulation (EC) No 853/2004.	NVWA undertook to carry out in September 2013 additional inspections in every MSM producing establishment. Inspections would focus on all sorts of aspects related to MSM (including labelling) However, if an operator could demonstrate that MSM is in compliance with point 3, Chapter 3. Section 5. ANNEX II of Reg. (EC) no 853/2004, NVWA would not enforce the labelling of this MSM as part of the meat content in the finished product. Nonetheless, in the supply chain, as a raw material, this still has to be labelled "MSM". *Assessment: This issue has been passed to other Commission services for further follow-up; thus this recommendation is "Closed for other reasons".*	
2012-6367-6 The Competent Authority should ensure that mechanically separated meat sold to other establishments is accompanied by the necessary information which allows food business operators to use it in meat preparations and meat products in accordance with the requirements of points 3(e) and 4(g), Section V, Annex III to Regulation (EC) No 853/2004, and to label the product destined to the final consumer in accordance with the requirements of Directive 2000/13/EC and of	This recommendation refers to conclusion from Section 5.3.6 and related findings in the Section of the audit report that the Dutch authority does not enforce requirements to indicate the MSM presence in meat products and meat preparations, thus allows for practices misleading the final customers. In its response NVWA stated that it will encourage the branch and trade organization to develop a guideline on how to label MSM and other mechanically separated meat that does not meet all the 3 criteria and how to provide the correct information into the supply chain. NVWA would revise this guideline once it is produced. Moreover, beginning from September 2013, NVWA will enforce requirements of Regulation (EC) No. 931/2011 (requiring "an accurate description of the food to be made available to the food business operator to whom the food is supplied") not only in MSM producing establishments but also in the supply chain.	Closed due to action taken

Audit 2012-6367 of 26 November 2012 in order to evaluate the control system in place governing the production of mechanically separated meat		
Recommendation	Basis for assessment	Current Status
paragraph 2, Section VI, Annex III to Regulation (EC) No 853/2004.	During the 2016 GFA NVWA stated that in February 2015 it issued an information paper on MSM. The paper contains the official position on MSM, including labelling issues, and had been agreed by the Ministry of Health, NVWA and the meat sector representatives. The paper provides also an official guide for the sector. In brief the "type 4" MSM must always be indicated on the label, regardless it is destined to final consumer or for industry. The "type 3" MSM has to be labelled as MSM if destined for the industry, while for the final consumer it can be count for the entire meat content. In the meantime, NVWA produced a new procedure for hygiene controls and labelling of MSM. NVWA also instructed inspectors on how to act in certain situations concerning the MSM labelling. NVWA provided a copy of the project procedure "Hygienic production and labelling of MSM" and the copy of the MSM paper published on the web.	

Audit 2012-6468 of 17 April 2012 in order to evaluate the control systems in place governing the production and placing on the market of bivalve molluscs		
Recommendation	Basis for assessment	Current Status
2012-6468-2 The CA should ensure that all classified compartments/areas are monitored for the presence of toxin-producing phytoplankton in	This recommendation is based on conclusion in Section 5.3.2 and related findings in the Section of the audit report that despite of overall well maintained monitoring on live bivalve molluscs (LBM) for microbiology, one compartment (Oosterschelde Noord) producing mussels is not monitored for biotoxins and toxin-producing phytoplankton. In its response NVWA undertook to extend the monitoring for biotoxins and toxin-producing	Closed due to action taken

Audit 2012-6468 of 17 April 2012 in order to evaluate the control systems in place governing the production and placing on the market of bivalve molluscs		
Recommendation	Basis for assessment	Current Status
production waters and biotoxins in live bivalve molluscs as required in Point 1, Part B of Chapter II of Annex II to Regulation (EC) No 854/2004.	phytoplankton also to the compartmenting in Noord. However, due to fixed budget for 2013 this will happen only beginning from January 2014. During the 2016 GFA NVWA stated that Oosterschelde Noord compartment is now included in the monitoring programme for biotoxins and toxin-producing phytoplankton. NVWA provided copy of monitoring plan and fact-sheet with the monitoring results.	
2012-6468-3 The CA should ensure that water samples for the monitoring of phytoplankton are representative of the water column as required in Point 7, Part B of Chapter II of Annex II to Regulation (EC) No 854/2004.	This recommendation is based on conclusion in Section 5.3.2 and related findings in the Section of the audit report that despite of overall well maintained monitoring on LBM water samples collected for phytoplankton monitoring are not always representative of the water column. In its response NVWA stated that it will investigate (research) how representative water samples should be taken and which improvements (equipment, training, etc.) need to be implemented per area. Implementation will start in the fourth quarter of 2013. During the 2016 GFA NVWA indicated that the procedure for sampling water (as regards phytoplankton) requires to take sample from 0,5m below the surface and from the bottom. NVWA confirmed that this sampling method is implemented by the inspectors. NVWA provided copy of the procedure for sampling No 2.16.2.23 (dated as of February 2014).	Closed due to action taken

Audit 2012-6468 of 17 April 2012 in order to evaluate the control systems in place governing the production and placing on the market of bivalve molluscs		
Recommendation	Basis for assessment	Current Status
2012-6468-4 The CA should ensure the monitoring of classified compartments/areas from which harvesting has been forbidden or subjected to special conditions, to ensure that products harmful to human health are not placed on the market to comply with the requirements of Point 1, Part D of Chapter II of Annex II to Regulation (EC) No 854/2004.	This recommendation is based on conclusion in Section 5.3.4 and related findings in the Section of the audit report that the Dutch Fish Product Board (DFPB) does not monitor the classified production areas from which harvesting had been forbidden or subjected to special conditions. Moreover, it has not in place an arrangement to verify operators' compliance with the requirements for the end product at all stages of production, processing and distribution. In its response NVWA stated that the monitoring of the classified areas where (temporarily) measures are taken would be done by DFPB through (temporarily) tighter rules for the use of registration documents and the specific use of enforcement documents. The monitoring of closed classified production areas will begin only after reorganisation. Only from that moment DFPB will get the powers to physically control production areas. Implementation will start from January 2014. During the 2016 GFA NVWA stated that production areas are rarely closed. Since 2012 the areas were closed twice. The first time in 2013/2014, after mussels with too high levels of AZP biotoxin from Ireland were placed in a production area into the Oosterschelde, and the second time during the 2015 summer after detecting tetrodotoxin (TTX biotoxin) in the Oosterschelde. In both situations the industry was informed about the problems and meetings were held for that purpose. NVWA confirmed that in such cases inspectors are informed and instructed to pay special attention to these closures. As local inspectors are located near the production areas they can actually see vessel movements from ashore. In these circumstances inspectors also pay special attention to the registration documents and the origin of mussels/oysters at purification and dispatch centres. The special patrols are held in the concerned areas and radar images are inspected. In case of a doubt also inspections with patrol vessels can take place.	Closed due to action taken

Audit 2012-6468 of 17 April 2012 in order to evaluate the control systems in place governing the production and placing on the market of bivalve molluscs		
Recommendation	Basis for assessment	Current Status
	NVWA provided copy of inspection journal indicating specific actions related to the 2015 incident with TTX.	
2012-6468-5 The CA should ensure that end-products are officially tested at all stages of production, processing and distribution to verify that the levels of biotoxins do not exceed safety limits as required in Point 2, Part D of Chapter II of Annex II to Regulation (EC) No 854/2004.	This recommendation is based on conclusion in Section 5.5.3 and related findings in the Section of the audit report that end-products are neither tested by NVWA nor operators to verify that the levels of biotoxins do not exceed safety limits. This is of a particular concern taking into account the volume of products traded from other countries and placed on the market via the Netherlands. Moreover, certain processes applied to shellfish prior placing on the market (e.g. cooking) elevates the level of lipophilic toxins. In its response NVWA stated that from 2013 onwards, it will take and test additional samples in the processing and distribution stage in order to fully comply with this requirement. The control programme of the conditioning areas will be extended with the monitoring of *Salmonella, E.coli*, biotoxins and viruses. NVWA foreseen 200 samples to be taken in purification and dispatch centres and 40 samples in supermarkets; the time frame: between April – September 2013. During the 2016 GFA NVWA indicated that in 2013 the control programme for end-products was established to monitor *Salmonella*, *E.coli*, *Norovirus* and biotoxins in the retail establishments (180 samples). Also, the control programme was developed in order to analyse the same criteria in dispatch and purification centres (500 samples). NVWA confirmed that samples are analysed from products originating from other EU Member States. NVWA provided copies of these specific projects and results for the years 2014-2015.	Closed due to action taken

Audit 2012-6468 of 17 April 2012 in order to evaluate the control systems in place governing the production and placing on the market of bivalve molluscs		
Recommendation	Basis for assessment	Current Status
2012-6468-7 The CA should ensure that official controls are carried out on pectinidae harvested outside classified production areas to verify compliance with the health standards laid down in Annex III, Section VII of Chapter V to Regulation (EC) No 853/2004, as required by Chapter III of Annex II to Regulation (EC) No 854/2004.	This recommendation is based on conclusion in Section 5.4 and related findings in the Section of the audit report that neither official controls nor official sampling are carried out on these raw products. In its response NVWA stated that from 2013 onwards, it will take some additional samples of *Pectinidae* harvested outside classified production areas on a regular basis in order to verify compliance. Namely, 10 samples will be taken in landing sites; time frame: between April – September 2013. During the 2016 GFA NVWA indicated that since 2013 samples of *Pectinidae* harvested outside classified production areas have been analysed under specific projects (microbiological criteria - 10 samples and biotoxins - 10 samples). NVWA provided copies of these specific projects.	Closed due to action taken
2012-6468-8 The CA should ensure that an assessment of the efficiency of the purification system is carried out in all the purification centres as required in Point 3, Part A, Chapter	This recommendation is based on conclusion in Section 5.5.4 and related findings in the Section of the audit report that there is no formal assessment by operators of the efficiency of purification systems. In its response NVWA stated that in 2013 it will focus on this issue during the regular audits that are performed in the purification centres. In this respect it would be no longer sufficient to refer to the "Hygienecode" for purification and dispatch centre. In 2013, operators of	Closed due to action taken

Audit 2012-6468 of 17 April 2012 in order to evaluate the control systems in place governing the production and placing on the market of bivalve molluscs		
Recommendation	Basis for assessment	Current Status
IV of Section VII of Annex III to Regulation (EC) No 853/2004.	individual purification centres will have to perform an assessment of the efficiency of their specific purification system. Overall 40 official inspections/audits will be carried out to check implementation. The time frame: between May – September 2013. During the 2016 GFA NVWA indicated that it organized meeting with inspectors, stakeholders and presented the findings of the 2012 audit. The assessment of efficiency of the purification systems is now part of NVWA control programme and during each System Audit senior inspectors have to evaluate it. The criteria which are assessed during the audits are based on the Centre for Environment, Fisheries and Aquaculture Science - CEFAS "protocol for inspection and approval or purification systems". Since 2013 NVWA carried out assessments of efficiency of the purification systems in all purification centres. NVWA provided copies of several reports and control programme that requires inspectors to assess efficiency of purification systems.	

Audit 2013-6696 of 19 November 2013 in order to evaluate the Salmonella National Control Programmes in particular poultry populations (breeders, laying hens, broilers and turkeys)		
Recommendation	Basis for assessment	Current Status
2013-6696-1 Where specific tasks related to official controls are delegated to one	This recommendation is based on conclusion in Section 5.1 and related findings in the section of the audit report that some control bodies are not accredited, impartial and free from any conflict of interest as no national provisions preventing / mitigating conflict of interest while performing official duties are in place. This results in private veterinarians or the farms' staff	Closed due to action taken

Audit 2013-6696 of 19 November 2013 in order to evaluate the Salmonella National Control Programmes in particular poultry populations (breeders, laying hens, broilers and turkeys)		
Recommendation	Basis for assessment	Current Status
or more control bodies, the CCA should ensure that these control bodies meet all the relevant EU requirements, in particular that they are accredited, impartial and free from any conflict of interest (paragraphs 2(c) and 2(b) (iii) of Article 5 of Regulation (EC) No 882/2004).	collecting official samples, and being on charge of the health care and treatment of poultry and assessment of biosecurity measures at the same time. In its response NVWA explained that from 1 January 2015 NVWA will be the competent authority in charge of the Salmonella National Control Programme (SNCP) and the Product Board for Poultry and Eggs (the earlier competent authority) will not be longer involved. NVWA undertook to ensure that delegated tasks will be carried out by persons and / or organisations that are impartial and free from any conflict of interest. During the 2016 GFA NVWA stated that since 1 January 2015 the Animal Health Service (GD) is the delegated control body. GD is the official laboratory with accreditation and a quality system assuring impartiality as well as provisions mitigating any conflict of interest. GD provides the service of sampling and carries out laboratory analyses both for NVWA and animal keepers. Duties and conditions for cooperation between NVWA and GD are laid down in the cooperation agreement. NVWA presented copy of the agreement**.**	
2013-6696-2 Where specific tasks related to official controls are delegated to one or more control bodies, the CCA should ensure that audits or inspections of control bodies are	This recommendation is based on conclusion in Section 5.1 and related findings in the section of the audit report that although some control bodies do not carry out their duties as required the competent does not withdraw their delegation. In its response NVWA explained that, from 1 January 2015, NVWA will be the competent authority responsible for SNCP (see recommendation No. 2013-6696-1). NVWA undertook to ensure that persons and /or organisations involved in SNCP are accredited, impartial and free	Closed due to action taken

Audit 2013-6696 of 19 November 2013 in order to evaluate the Salmonella National Control Programmes in particular poultry populations (breeders, laying hens, broilers and turkeys)		
Recommendation	Basis for assessment	Current Status
organised by the delegating CA in compliance with the requirements of Article 5(3) of Regulation (EC) No 882/2004.	from any conflict of interest. During the 2016 GFA NVWA stated that since 1 January 2015 the Netherlands Enterprise Agency (RVO) is the delegated body in charge of official controls on SNCP. NVWA supervises activities of RVO by: a) regular consultation meetings with GD, during which NVWA monitors achievements of targets for SNCP, b) accreditation audits or ISO 17025 audits, and c) audits focusing on the GD performance. In 2017 the NVWA audit will cover also the GD sampling activity. NVWA presented the contract between RVO and GD, and report on consultation between NVWA and GD on the progress made in implementation of SNCP.	
2013-6696-3 In order to be able to evaluate the progress under the provisions of the SNCP, and for the SNCP to be reviewed, in line with Article 5(3.d) of Regulation (EC) No 2160/2003 the CCA should ensure that official sampling is carried out in compliance with the provisions of point 2.1 of Annexes to Regulations (EU) Nos 200/2010 and 517/2011. In particular, it should ensure that	This recommendation is based on conclusion in Section 5.3 and related finding in the Section of the audit report that in the majority of cases *Salmonella* samples are recorded without indication whether they had been taken as official or own-check ones. In addition some own-check samples had been recorded as official samples on the laboratory analyses results. As a consequence, implementation of official sampling cannot be accurately monitored. In its response NVWA stated that it will introduce a distinction between official samples and samples collected by operators. During the 2016 GFA NVWA stated that once NVWA became in charge of SNCP, only GD is responsible for collecting official samples. GD collects also samples for operators' own-checks but it has in place a system to distinguish both types of samples. Finally, GD manages all information on samples and results via IT system that also keeps distinction between these	Closed due to action taken

Audit 2013-6696 of 19 November 2013 in order to evaluate the Salmonella National Control Programmes in particular poultry populations (breeders, laying hens, broilers and turkeys)		
Recommendation	Basis for assessment	Current Status
official sampling is distinguished from own-check sampling.	two kinds of samples. NVWA presented evidence that official and operators' samples are coded and recorded in the system in a different way**.**	

Audit 2014-7140 of 04 March 2014 in order to evaluate the food safety control systems in place governing the production and placing on the market of fishery products		
Recommendation	Basis for assessment	Current Status
2014-7140-1 The CAs should ensure that all fishing vessels are regularly inspected as required under Annex III, Chapter I, part 1 (b) of Regulation (EC) No 854/2004 and that requirements of Chapter I, Section VIII of Annex III to Regulation (EC) No 853/2004 are met.	This recommendation is based on findings and conclusions of section 5.3.1 of the audit report stating that there is neither inspection plan for fishing vessels, nor a set inspection frequency; moreover check-lists are not used and inspectors do not produce inspection reports. Records of inspected fishing vessels are maintained at central level; in consequence the competent authority cannot ensure that only vessels inspected and found in compliance with established requirements are allowed to provide fishery products to establishments. In its response the competent authority stated that it will implement a system of regular planed inspections of primary fishing vessels as part of the official controls, as described in the inspection protocol "Official controls fish and fishery products". The release of the new version of the inspection protocol is foreseen in January 2015. During the 2016 GFA NVWA stated that Sustainability inspectors, that are part of NVWA, carry out inspections in the registered fishing vessels. Inspectors are trained to look after hygiene deficiencies on board of the vessels. In the past these inspectors only looked after	Closed due to action taken

Audit 2014-7140 of 04 March 2014 in order to evaluate the food safety control systems in place governing the production and placing on the market of fishery products		
Recommendation	Basis for assessment	Current Status
	deficiencies and did not record on the conformity level. NVWA has changed this way of working and beginning from 2016 the Sustainability inspectors use an inspection lists; questions from 800-890 are related to hygiene requirements, adequate storage of fish, temperature, etc. Annually, the inspectors control 50 registered fishing vessels. The vessel owner receives the inspection result in a form of inspection report. If the Sustainability inspector identifies any deficiency in relation to the hygiene requirements he/she contacts a public health inspector. In such situation a thorough hygiene inspection is carried out by the public health inspector as soon as the concerned fishing vessel lands in the harbour.	
2014-7140-2 The CA should ensure that food business operators put in place, implement and maintain permanent procedures base on HACCP principles as required in Article 5 of Regulation (EC) No 852/2004. In particular, that limits set for CCPs are in line with EU requirements, relevant potential hazards are identified and food business operator' own-checks guarantee that products comply with	This recommendation is based on conclusion in Section 5.3.1 and findings in the Section of the audit report stating that in most of the facilities visited food business operators inadequately implemented HACCP based procedures (e.g.: relevant potential hazards were not identified, limits set for some critical control points - CCPs were not in line with EU requirements, the EU reference method for histamine was not used). In addition, food business operators' own-checks do not cover all relevant parameters (histamine, microbiology, additives). In its response NVWA stated that despite some shortcomings identified, overall an efficient follow up of responsibilities, working methods and protocols for HACCP and microbiological criteria are well described and applied in the daily practice. Nonetheless, to improve the situation, in 2014 NVWA intends to organise regular meetings for inspectors to direct their focus on the correct use of the protocols with specific attention to	Closed due to action taken

Audit 2014-7140 of 04 March 2014 in order to evaluate the food safety control systems in place governing the production and placing on the market of fishery products		
Recommendation	Basis for assessment	Current Status
microbiological criteria laid down under Regulation (EC) No 2073/2005 and with other EU applicable legislation.	fresh fish storage conditions, company own checks and effective follow up of verifications done by the food business operators. The debriefing results will be brought under the attention of the inspectors in order to improve their work in accordance with the described working methods. In relation to the official control procedures for HACCP and the Regulation 2073/2005 as already exists, no further measures will be taken by NVWA. During the 2016 GFA NVWA stated that after the audit the system of HACCP auditing was revised. Only experienced inspectors can perform HACCP audits. Namely, an "inspector auditor" carries out audit in small, medium and large establishments with simple production processes, a "senior inspector auditor" at medium and large establishments where process is complex and judgement is required. An "inspector" - carries out hygiene inspections in small and medium fish processing establishments. The official protocol for fish, fishery product controls was modified and now includes additional items to be controlled (i.e. microbiological criteria, histamine, polycyclic aromatic hydrocarbons (PAH), and additives). Inspectors were informed about these changes. NVWA provided copies of the documents and example of agenda of the meeting with inspectors.	
2014-7140-3 The CA should ensure that food	This recommendation is based on conclusions in Section 5.3.1 and related findings in the section of the audit report stating that in establishments visited handling histamine sensitive species, operators' own-checks do not include histamine. In addition test for histamine was	Closed due to action taken

Audit 2014-7140 of 04 March 2014 in order to evaluate the food safety control systems in place governing the production and placing on the market of fishery products		
Recommendation	Basis for assessment	Current Status
business operator' own-checks for histamine are carried out taking into account in particular, the sampling methods for histamine (sample of nine units) and the EU reference method as is laid down in Regulation (EC) No 2073/2005.	carried out inappropriately: 1) only one sample unit instead of nine units was taken, and 2) ELISA method, which is not the EU reference method required in Regulation (EC) No 2073/2005, has been used. In its response NVWA stated that on a short term (2014) it will organise regular meetings with inspectors involved in official controls with a focus on the use of correct reference methods as described for histamine in the Regulation 2073/2005. Debriefing results will be brought under the attention of the inspectors in order to improve their work in accordance with the described working methods. During the 2016 GFA NVWA stated that discussions were held with the Dutch Fish Federation where it expressed the need to align sampling method for histamine (sample of nine units) with the EU reference method. According to NVWA the Dutch Fish Federation took into account the EU reference sampling method. NVWA informed all inspectors about this change and amended the control protocol for histamine. NVWA provided copies of protocols and results for the year 2015.	
2014-7140-4 The CA should ensure that fishery products satisfactorily undergo all the official controls laid dawn in Chapter II of Annex III to	This recommendation is based on conclusion in Section 5.3.2 and related findings of the Section of the audit report that the competent authority does not take official samples at establishment level for testing on histamine. Moreover, despite of significant production of smoked fish products, PAH monitoring is not carried out on a continuous basis as part of official controls.	Closed due to action taken

Audit 2014-7140 of 04 March 2014 in order to evaluate the food safety control systems in place governing the production and placing on the market of fishery products		
Recommendation	Basis for assessment	Current Status
Regulation (EC) No 854/2004, in particular concerning PAH and histamine.	NVWA is in opinion that the histamine risk associated with mackerels, herrings and sardines is so well managed at Dutch freezer vessels that there is no need for taking official samples for histamine testing at fish processing establishment. However, the establishments process also the histamine sensitive species coming from other Member States and no official controls of these fish is conducted too. In its response NVWA stated that official sampling analyses of PAH and histamine will be implemented for fish processing facilities and freezing vessels complementary to the official controls in the retail sector. NVWA intends to implemented the measures in the 20115 work plan for official controls. During the 2016 GFA NVWA stated that sampling for PAH and histamine at fish processing establishments is now included in specific control protocols. -The number of annual samples for PAH: 20, histamine: 40 (20 at vessels / establishments and 20 at border inspection points (BIPs)). NVWA provided copies of protocols and results for the year 2015.	
2014-7140-5 The CA should ensure that only potable water is used in fishery products establishments/vessels and for producing ice in accordance with Chapter 7 of Annex II to Regulation	This recommendation is based on conclusion in Section 5.3.4 and related findings in the Section of the audit report stating that CA does not verify (through official sampling and testing) the quality of drinking water used in fish processing establishments, including fishing vessels producing ice, to ensure that water used complies with requirements laid down in Directive 98/83/EC. In its response NVWA disagreed with part of the conclusion and stated that the quality of the	Closed due to action taken

Audit 2014-7140 of 04 March 2014 in order to evaluate the food safety control systems in place governing the production and placing on the market of fishery products		
Recommendation	Basis for assessment	Current Status
(EC) No 852, and Directive 98/83/EC.	water is constantly monitored by other competent authority, namely the Environment and Transport Inspectorate (ILT) as well as by municipal and county water companies supplying the water. This response has been assessed as unsatisfactory because the primary obligation for verification of the water quality lays with the competent authority. NVWA agreed with the need of verification of the water quality at fishing vessels producing ice and undertook to introduce official controls in this respect beginning from 2015. During the 2016 GFA NVWA stated that the quality of potable water is tested regularly and provided copies of some test results. During the 2016 GFA NVWA stated that in the past the National Institute for Public Health and the Environment (RIVM) carried out extensive checks on the quality of potable water. The checks resulted in conclusion that: "Potable water was of good quality. In 16 % of checked locations (production sites) results exceed the standards. Nonetheless, this under no circumstances constituted a threat to public health." According to the report a large proportion of the non-compliant samples account for single incident and related to substances not causing threat for public health, (e.g.: presence of iron and manganese). In one case standard for pesticides at pumping station exceeded the norm. Results demonstrated compliance of pumping stations with indicators for contamination by pathogenic micro-organisms. These indicators were the limits in the distribution network. However, in all cases, bacteria were present short time and did not give rise to any health problems. Nonetheless, in these locations, occupants of nearby households received advice to boil the water before use. Based on this project NVWA developed a potable-water policy for the use of drinking water	

Audit 2014-7140 of 04 March 2014 in order to evaluate the food safety control systems in place governing the production and placing on the market of fishery products		
Recommendation	Basis for assessment	Current Status
	by food business operators. According to the policy the operators can use for production purpose only water from the official public water system, as this provides quality guarantees. If operators for operation use water stored in tanks, have water treatment facilities, complex distribution systems then they are obliged to demonstrate that the quality of the water used complies with the Drinking Water Decree or otherwise meet the conditions of the Council Directive 98/83. In such cases operators should be able to demonstrate the quality of water by analytical results of own-check controls. NVWA provided copy of the RIVM report and potable water policy (201307). Regarding verification of the water quality at fishing vessels producing ice the NVWA confirmed that the policy has changed and additional sampling has been introduced as part of official controls. Specific project stipulates that 60 samples have to be tested for microbiological contamination (*E.coli, Enterococcus*). NVWA provided copy of the specific project (2015).	
2014-7140-6 The CA should ensure that additives are only used in accordance with Regulation (EC) No 1333/2008.	This recommendation is based on conclusion in Section 5.3.3 and related findings in the Section of the audit report that the competent authority does not carry out official sampling to ensure that food business operators use additives according to their own recipes and in compliance with the limits established in Regulation (EC) No 1333/2008, while in some establishments results of benzoic acid exceeded the regulatory limit. In its response NVWA stated that it will give specific focus to that issue in the 2015 work plan for official controls.	Closed due to action taken

Audit 2014-7140 of 04 March 2014 in order to evaluate the food safety control systems in place governing the production and placing on the market of fishery products		
Recommendation	Basis for assessment	Current Status
	During the 2016 GFA NVWA stated that additives are now included in the control protocol for fish. Additional sampling was introduced that prescribes testing for additives in 75 fishery product samples. NVWA provided copy of the protocol and results for 2016.	

Audit 2015-7501 of 20 April 2015 in order to evaluate the food safety control systems in place governing the production and placing on the market of eggs and egg products		
Recommendation	Basis for assessment	Current Status
2015-7501-1 The CCA should ensure that the establishments are approved for all activities carried out in order to ensure compliance with the requirements of Article 31(2)(c) and (e) of Regulation (EC) No 882/2004. In particular plants producing liquid eggs and establishments producing egg products should be approved for the activities they carry-out only if the FBO has demonstrated it complies with the relevant requirements of food law.	This recommendation is based on the conclusion from Section 5.3 (No. 45) and related finding (No. 41) of the audit report that some eggs processing establishments dispatch not-processed eggs / egg products despite they scope of approval allows only for dispatch of the processed ones. In its initial response NVWA stated that it will include all activities concerned running by egg establishments in the approval process. The approved activities will be, in detail, listed in the approval letter. In its further clarification (July 2016) NVWA stated that it has modified the approval letters for egg establishments and all relevant activities are included and specified. NVWA presented model of the new approval letter.	Closed due to action taken

Audit 2015-7501 of 20 April 2015 in order to evaluate the food safety control systems in place governing the production and placing on the market of eggs and egg products		
Recommendation	Basis for assessment	Current Status
Recommendation based on conclusion: No 45. Associated findings: No 41.		
2015-7501-2 The CCA should ensure that only those establishments approved for the production of liquid eggs (liquid egg plants) and egg products (processing establishments) are included on the list of approved establishments in order to meet the requirement of Article 31(2)(f) of Regulation (EC) No 882/2004. Recommendation based on conclusion: No 45. Associated findings: No 43.	This recommendation is based on the conclusion from Section 5.3 (No. 45) and related finding (No. 43) of the audit report that the list of approved egg establishments contains certain types of establishments (e.g. bakeries and confectioneries) that use raw eggs / egg products as ingredients for their own food products. This leads to disorientating assumption that such establishments could dispatch liquid eggs / egg products to other operators. In its initial response COKZ stated that it will amend the lists accordingly. Namely, the list will contain egg establishments approved for production and dispatch of liquid eggs / egg products for the use by other operators. Establishments producing other foodstuff and using eggs / egg products for the purpose of their own production will be de-listed. In its further clarification (July 2016) COKZ explained that four establishments (industrial bakeries) using unprocessed (liquid) eggs / egg products for their own production need to remain on the lists. COKZ explained that it had received legal consultation according to which these bakeries fall under approval requirement due to the industrial production of composite products comprised of unprocessed product of animal origin and plant products. These products are intended for the ultimate customer but bakeries do not supply them directly to the final customer; thus must be approved and listed. All other establishments have been de-listed as proposed initially.	Closed due to action taken

Audit 2015-7501 of 20 April 2015 in order to evaluate the food safety control systems in place governing the production and placing on the market of eggs and egg products		
Recommendation	Basis for assessment	Current Status
2015-7501-3 In order to comply with Article 3(1) of Regulation (EC) No 882/2004, the CCA should ensure that official controls are carried out on a risk basis and taking into account all the relevant elements contained in this Article. Recommendation based on conclusion: No 59. Associated findings: No 49.	This recommendation is based on the conclusion from Section 5.4.1 (No. 59) and related finding (No 49) of the audit report that during organisation of official controls the competent authority does not take into account the reliability of operators' own-checks, the operators' past records of compliance, the identified risk associated to the type of food / process and other inherent factors increasing or decreasing the risk of establishments – including farms. In its response COKZ undertook to amend planning of official controls so it would be more risk based. In the annual control plan for 2016 the number of inspection per establishment will no longer be fixed, but dependent on the results of earlier inspections and risks associated with the activities performed by the establishments. In its additional response (July 2016) COKZ stated that already the egg industry operators are: a) covered by regular inspections ranging from 6 to 9 per year, b) selected on the risk related to the production process, and c) selected on the basis of deficiencies identified in the past. COKZ presented evidence that these elements are incorporated in the 2016 COKZ work programme (references are present in the section for egg packaging centres, traders and egg products establishments). COKZ stated that this line will continue in the future beginning from the preparation of the 2017 annual control programme.	Closed due to action taken
2015-7501-4 The CCA should ensure that in case of farms testing positive for Salmonella enteritidis/typhimurium:	This recommendation is based on the conclusions from Section 5.4.2.2 (No. 75 and 76) and related finding (No. 70) of the audit report that there is long delay between sampling, testing and communication of non-compliant result of *Salmonella* tests. Consequently it delays implementation of safety measures in farm. This poses a risk that salmonella-positive eggs	Closed due to action taken

Audit 2015-7501 of 20 April 2015 in order to evaluate the food safety control systems in place governing the production and placing on the market of eggs and egg products		
Recommendation	Basis for assessment	Current Status
- the time elapsed between sampling, testing and communication of results is appropriate in order to ensure that in case of positive results for relevant Salmonella serotypes the requirements laid down in Point 2, Part D of Annex II to Regulation (EC) No 2160/2003 are implemented without delay; - the requirements laid down in Point 2.1(d) of Annex to Regulation (EU) No 517/2011 and Point 2.2.2 of Annex to Regulation (EU) No 517/2011 are implemented - FBOs comply with the requirements laid down in Point 4(h), Part II, Annex I to Regulation (EC) No 852/2004. Recommendation based on conclusions: Nos 75 and 76. Associated findings: No 70.	could be placed on the market. In its response NVWA undertook to improve communication between laboratories testing farm samples for *Salmonella* and AVINED. The renewed working procedure stipulates that samples are collected from all flocks present at a farm that is found to be positive for *Salmonella enteritis* or *Salmonella typhimurium*. The Dutch Supervisory Authority for Eggs (NCAE) and COKZ will pay special attention to the provisions concerning prevention of spread of contagious disease transmissible to humans. NVWA and COKZ/NCAE will develop a check-list for inspectors collecting samples in the suspect farm. In its additional information (July 2016) COKZ stated that: a) The new protocol (valid since April 2016) is in place and strict standstill conditions apply in cases of positive farms and their eggs. Working procedure in case of suspicion / confirmation of Salmonella positive holding is developed and disseminated. COKZ indicated that the responsibilities of involved parties had not yet been fully clarified (competences as regards zoonosis - NVWA and food hygiene - COKZ); nonetheless, this has no influence on actions, if needed. In case of intervention both COKZ and NVWA would act together until the competences are defined. The authorities expect this issue to be resolved in the first quarter of 2017. COKZ provided copy of the Protocol containing measures applying to the farm that obtained non-compliant result for Salmonella, copies of the internal correspondence on responsibilities	

Audit 2015-7501 of 20 April 2015 in order to evaluate the food safety control systems in place governing the production and placing on the market of eggs and egg products		
Recommendation	Basis for assessment	Current Status
	of involved parties. b) The communication protocol between the designated laboratories and NVWA has been finalised. It requires instant communication of non-compliant result via e-mail. Although the protocol would be officially signed in September 2016 it rules have been already implemented. c) The check-list for COKZ inspectors is drafted but has not been yet formalised. NVWA expects to complete the process by the summer 2017. NVWA presented the draft of risk analysis for laying hens farms.	
2015-7501-5 The CCA should ensure that the HACCP plans in establishments producing egg powder meet the requirements laid down in Part III, Chapter II, Section X of Annex III to Regulation (EC) No 853/2004 in order to ensure compliance with Article 5 of Regulation (EC) No 852/2004. Recommendation based on	This recommendation is based on the conclusions from Section 5.4.5 (No. 96 and 97) and related finding (No. 95) of the audit report that there are some shortcomings concerning the production of liquid eggs, namely concerning their storage - eggs are kept either in ambient temperature or in temperature lower than 4°C for longer than the 48 hours. In its response COKZ undertook: a) to modify inspection list for controls on production of egg powder, b) to instruct, during work meetings, the NCAE inspectors on the above-mentioned inspection list and, in general, on checks on HACCP and basic hygiene requirements in egg product establishments, and	Closed due to action taken

Audit 2015-7501 of 20 April 2015 in order to evaluate the food safety control systems in place governing the production and placing on the market of eggs and egg products		
Recommendation	Basis for assessment	Current Status
conclusions: Nos 96 and 97. Associated findings: No 95.	c) to organise refreshing course on HACCP for NCAE inspectors. In addition information (July 2016) NVWA stated that: Ad a) A new inspection list (together with instructions) has been developed. COKZ/NCAE provided copy of the inspection list. Ad b) and c) Training courses for the NCAE inspectors took place; in June 2015 on HACCP and in September 2015 on hygiene requirements and application of the new inspection list. COKZ presented attendance lists, training programmes and presentations delivered during training sessions.	
2015-7501-6 The CCA should ensure that the food additives used for the production of egg products are those authorised in the EU list laid down in Regulation (EC) No 1333/2008 and are approved and used for the specific category of food in accordance with Part E of Annex II to the same Regulation. Recommendation based on	This recommendation is based on the conclusion from Section 5.4.6 (No. 117) and related findings (No. 111, 112 and 113) of the audit report that the competent authority official controls on food additives are not comprehensive. In one establishment this led to situation where, during the production process for egg products, operator used one food additive incorrectly. Namely, operator used Sodium benzoate (E211) and Potassium and sodium triphosphates (E451) for the production of brine for the preservation of the eggs. The brine was in direct contact with eggs and these additives are neither authorised for use in processed egg products nor in the brine. In its initial response COKZ expressed opinion that Regulation 1333/2008 is not applicable in case that sorbic acid and polyphosphates are used as a preservative agent in the water used to store the eggs, thus such additives are out of the scope of the Regulation (excluded by Article	In Progress Post GFA

Audit 2015-7501 of 20 April 2015 in order to evaluate the food safety control systems in place governing the production and placing on the market of eggs and egg products		
Recommendation	Basis for assessment	Current Status
conclusion: No 117. Associated findings: Nos 111, 112 and 113.	2 of the Regulation). Because there are no special regulations dealing with processing aids NVWA suggested to address this point by the Central Working Group on additives and to find a harmonised approach for Europe. During the 2016 GFA COKZ stated that it agrees with the finding and will communicate to operators that substances mentioned above should be considered as food additives and not as processing aids. COKZ undertook to approach this issue with "the wider angle" and provide training to its inspectors on how to differentiate processing aids from food additives during official controls. Subsequently COKZ will organise controls focussing on this issue and communicate the revised approach to the sector. **Assessment: In order to address this recommendation COKZ should demonstrate that official controls in place verify the use of food additives and other substances in food. In particular, if for production of eggs operators use food additives that are authorised and are approved for the specific category of food.**	
2015-7501-7 The CCA should ensure that the identification mark applied on egg products fulfils all the requirements	This recommendation is based on the conclusion from Section 5.4.9 (No. 133) and related finding (No. 124) of the audit report that the competent authority did not ensured that operators use correct identification mark for eggs or egg products. In particular a stamp used did not bear all required abbreviations and one establishment used the approval number of	Closed due to action taken

Audit 2015-7501 of 20 April 2015 in order to evaluate the food safety control systems in place governing the production and placing on the market of eggs and egg products		
Recommendation	Basis for assessment	Current Status
of Section I of Annex II to Regulation (EC) No 853/2004, in particular regarding Points 1 and 8 concerning the identification of the establishment of production and the format and the abbreviations to be included. Recommendation based on conclusion: No 133. Associated findings: No 124.	another establishment. In its response COKZ undertook to establish the reason for this issue and follow on the issue during assessment of the egg industry. In additional information (July 2016) COKZ stated that, after analysing the situation, the incorrect use of the approval number had an incidental character and concerned only one company. The company owns two establishments handling eggs and eggs products and used approval numbers of both establishments interchangeably. Nonetheless, COKZ requested the company to use only one approval number. COKZ presented correspondence with the company in this respect and copy of registration form for the non-EU country that receives products exported from the company concerned. Incorrect use of approval number has been discussed within the organisation. As regards incorrect form of identification mark applied on the egg products COKZ stated that future assessments within the egg product industry the authority will focus on this point.	

2.B.3 Imports of animals and food of animal origin

Audit 2013-6759 of 17 June 2013 in order to evaluate the national procedures in place to verify effectiveness of the import control system		
Recommendation	Basis for assessment	Current Status

Audit 2013-6759 of 17 June 2013 in order to evaluate the national procedures in place to verify effectiveness of the import control system		
Recommendation	Basis for assessment	Current Status
2013-6759-1 To complete the implementation of actions indicated in response to the 2009 and 2011 reports, specifically regarding the legal instrument to ensure the notification of consignments in advance of their arrival (as required in Article 2 of Regulation (EC) No 136/2004 and Article 3 of Directive 97/78/EC).	This recommendation is based on the conclusion in Section 6 and related findings in Section 5.6 of the audit report that the monthly rate of consignments with no pre-notification ranges from 4% to 20%. Moreover this issue has not been addressed by the authority since 2011. In its response NVWA stated that it prepares to implement measures (sanctions). The authority expects that the measures will be introduced by 2015. During the 2016 GFA NVWA stated that a new intervention policy has been developed and published on the NVWA website: https://www.nvwa.nl/onderwerpen/dieren-dierlijke-producten/dossier/interventiebeleid/interventiebeleid-import-dieren-en-producten-van-dierlijke-oorsprong The new intervention policy allows NVWA to impose administrative penalties on importers in cases when consignments are not pre-notified. According to the new policy the importer will receive warning for the first time and only for the second non-compliance the administrative fine will be imposed. NVWA confirmed that it changed the legal basis in order to have the rights to impose administrative penalties. The stakeholders have been informed about the change in the policy. In June 2016 NVWA trained inspectors in charge of import controls at BIPs. The training focused on how to implement the new intervention policy and how to apply fines. NVWA intends to begin application of the new policy at the end of third semester of 2016. NVWA provided the list of inspectors participating in training.	Closed due to action taken

Audit 2013-6759 of 17 June 2013 in order to evaluate the national procedures in place to verify effectiveness of the import control system		
Recommendation	Basis for assessment	Current Status
2013-6759-2 To implement exit checks for consignment in transit that ensure that the consignment received conforms to that despatched from the BIP of introduction as required in Article 3 of Commission Decision 2000/208/EC., as recommended in the 2011 report	This recommendation is based on the conclusion in Section 6 and related findings in Section 5.6 of the audit report that the competent authority does not carry out physical checks on exit checks (namely containers' seal check) for consignments in transit to ensure that the exiting consignments conform to those introduced. Moreover this issue has not been addressed by the authority since 2011. In its response (July 2014) the competent authority stated that exit checks are carried out by using digital information on tracking & tracing sites and information from customs. In the authority opinion this is comparable to information in Trade Control and Expert System (TRACES). Feedback information has been recorded in TRACES since 2010. The authority stressed that in its view there is no legal base to enforce containers checks at certain location in the port for exit checks. Actually all consignments are loaded in or in the neighbourhood of the Rotterdam port area and are sealed by the authority officials. The distance to the exit point is rather short therefore, in the authority view the risk of manipulation is negligible. For that reason performing additional container checks at certain location in the port is of a little value. The authority expressed its intention to continue exit checks as so far. *Assessment: In the opinion of the Commission services electronic tracking and confirmation of containers exit do not provide sufficient guarantees on the integrity of the content. For that reason it does not:* *a) fulfil the objective of the import legislation (to ensure that products arriving at the Community border without having the Community as final destination will leave the*	Action Still required Post GFA

Audit 2013-6759 of 17 June 2013 in order to evaluate the national procedures in place to verify effectiveness of the import control system		
Recommendation	Basis for assessment	Current Status
	Community), and *b) comply with the requirements prescribed in Article 3 of Commission Decision 2000/208/EC for the controls (the official at the exit BIP) should confirm that the consignment received conforms to that despatched from the BIP of introduction, and that it matches the information given in the certificate accompanying the consignment).* All the above were presented in the Commission letter addressed to the Dutch authorities. In their correspondence the authorities expressed intention to put in place measures that would provide guarantees that exit checks are in line with the EU legislation. However, the authorities did not present formal action plan. During the GFA 2016 the GFA team confirmed that situation in place remained unchanged and no corrective actions were implemented. However, the Ministry of Economic Affairs stated that it will officially react to the Commission letter and will ask for a meeting to discuss current legislative developments (Customs Law, Official Control Regulation) which will have impact on this file. **Assessment: As the competent authority has not taken corrective actions and the situation in place remains unchanged this recommendation is assessed as: "Action still required". This assessment may change if the competent authority will present evidence that it initiated corrective actions.** **In order to fully address this recommendation the Ministry should demonstrate that exit checks on consignments in transit comply with provision of Article 3 of Commission Decision 2000/208/EC.**	

Audit 2013-6759 of 17 June 2013 in order to evaluate the national procedures in place to verify effectiveness of the import control system		
Recommendation	Basis for assessment	Current Status
2013-6759-3 To ensure that documentary checks are carried out for consignments from third countries being transhipped to other third countries staying in a port more than seven and less than 20 days as required in Articles 11 and 9 of Directive 97/78/EC., as recommended to the 2011 report	This recommendation is based on the conclusion in Section 6 and related finding in Section 5.6 of the audit report that the competent authority does not carry out documentary checks for transshipped consignments from third countries to other third countries and staying in a port more than seven and less than 20 days. This issue has been open since 2011. In its response (July 2014) the competent authority stated that relevant procedure goes through the adaptation process. The procedure will contain the requirement to perform documentary checks on consignments being transshipped to third countries, which stay in a port more than seven and less than 20 days. During the 2016 GFA NVWA stated that paragraph 5.3.2. of the internal procedure BPR-17 has been modified and documentary controls are carried out on transshipment consignments to third countries between 7 and 20 days. The days count from the moment the consignment arrives to the port. Between 7-20 days only documentary controls take place. NVWA provided copy of the procedure. NVWA stated that, according to the existing procedure, the documentary control is carried out based on the landing bills and not on certificates or veterinary document of origin. NVWA expressed opinion that current legislation allows to carry out controls in such a way. Nonetheless, NVWA undertook to re-confirm the interpretation of legal basis with the Commission, as legislation (Art.9 (1) (a) is ambiguous, particularly, on which documents these controls should be carried out. NVWA stressed that demanding of an original health certificate for documentary checks is pointless as this document is hardly available during transit. Moreover such demand causes	In Progress Post GFA

Audit 2013-6759 of 17 June 2013 in order to evaluate the national procedures in place to verify effectiveness of the import control system		
Recommendation	Basis for assessment	Current Status
	additional burden both for the non-EU country (need for issuing a declaration of acceptance) and the EU Member State staff at BIP. **Assessment: In order to fully address this recommendation NVWA should provide evidence that it carries out documentary controls on transshipped consignments in accordance with the EU provisions.**	

Audit 2014-7024 of 27 October 2014 in order to evaluate the use of the TRACES system		
Recommendation	Basis for assessment	Current Status
2014-7024-2 To ensure that data of relevant official controls (e.g. exit transit, re-imported or destruction consignments, controls at abattoirs, intra-EU movements of certain animal by-products) are recorded in TRACES as laid down in Decision 2004/292/EC. Recommendation based on conclusion 47. Associated findings: 18, 20, 36, 37, 40 and 43.	This recommendation is based on conclusion No. 47 and associated findings (No. 18, 20, 36, 37, 40 and 43) in Section 5.2 of the audit report stating that the traceability of consignments and communication between competent authorities from The Netherlands and other Member States is undermined. This situation results from incompleteness of TRACES records due to either: - the lack of official controls at BIPs (e.g. exit of transit consignments) and by NVWA offices (e.g. re-imported or consignments sent for destruction), or - in cases where controls had been done, from the fact that these were not recorded in TRACES. Moreover, certain types of consignments, originating from intra-community trade, are either not controlled at the place of destination, e.g. animal by-products (ABP), or the full range of	In Progress Post GFA

Audit 2014-7024 of 27 October 2014 in order to evaluate the use of the TRACES system		
Recommendation	Basis for assessment	Current Status
	controls are not recorded in TRACES (e.g. slaughter animals). In their response NVWA undertook the following measures: a) Finding 18: Controls of transit consignments on exit; All BIPs will carry out such controls. Work instructions will be amended, if necessary. The follow-up of the controls will be recorded in TRACES. Target date: 01 July 2015. b) Finding 20: Common veterinary entry documents (CVEDs) are going to be immediately entered in TRACES to prevent delay. Deadline: directly after the audit. c) Finding 36: Controls of consignments at the place of destination - Business rule will be activated in TRACES NL to check 100% of re-imported consignments at the place of destination. Target date: 01 July 2015. d) Finding 37: Controls on consignments sent for destruction - TRACES NL will be extended with the possibility to select consignments sent for destruction to be checked at the place of destination. Request for change has been formulated and submitted to the IT-department. In addition NVWA will issue /amend a national instruction to ensure checks at the place of destination and to record their result in TRACES. Target date: 01 August 2015. e) Finding 40: Official controls related to ante-mortem inspections will be carried out in accordance with EU-requirements. Results of controls will be recorded in TRACES, in line with Decision 2004/292/EC. Relevant instructions will be amended if necessary. Target date: 01 July 2015. f) Finding 43: Controls on consignments of ABP - Due to some earlier internal national agreements and organisational limitations checks will be carried out on the risk base; in	

Audit 2014-7024 of 27 October 2014 in order to evaluate the use of the TRACES system		
Recommendation	Basis for assessment	Current Status
	particular high risk ABP will be checked with higher and low risk ABP with lower frequency. In 2015 NVWA will consider to carry out checks in a different way by which the frequency will increase. This can be possible when operators notify the arrival of consignments electronically to the CA after which checks can be performed at random. Implementation deadline: 2016/2017. During audits: DG(SANTE)/2015-7438 and DG(SANTE)/2015-7436, the audit teams verified the implementation of actions proposed for findings No. 18 and 20. The audit teams confirmed that the NVWA corrective actions in this respect satisfactorily addressed the issues. During the 2016 GFA NVWA indicated that in their project protocol LPNT 169 provisions as regards input of ante- and post-mortem examination results into TRACES database were included (in force since 10-02-2016). It also reminded veterinarians in the slaughterhouses in September 2016 to input required data into the database. As regards controls at destination on consignments of ABP NVWA confirmed that it carries out these on the risk basis principle (high risk ABP are checked with higher frequency and low risk ABP with lower frequency). The policy on this issue is being changed at the EU level. NVWA stated that it up-dated work instruction as regards the re-imported consignments. The procedure cover introduction in TRACES information on checks to be carried out at the place of destination. NVWA provided copy of the instruction and indicated webpage where the instruction is available: https://www.nvwa.nl/onderwerpen/eten-drinken-roken/dossier/import-vanuit-derde-landen/import-van-dieren-en-producten-van-dierlijke-oorsprong/documenten. NVWA confirmed that previous action regarding TRACES NL modification to select consignments sent for destruction in order to check them at the place of destination is still in	

Audit 2014-7024 of 27 October 2014 in order to evaluate the use of the TRACES system		
Recommendation	Basis for assessment	Current Status
	progress. The request for change was formulated and submitted to the IT-department. It is expected that in first half of 2017 the action will be finished. Data from TRACES (2016 for the first nine months) reveal that: - 25% of re-imported consignments were recorded in TRACES (reference to finding 36), and - 1 out of 124 consignments sent for destruction was confirmed in TRACES at the place of destination (reference to finding 37). **Assessment: In order to fully address this recommendation NVWA should present evidence that actions for findings 36 and 37 have been completed and relevant information is recorded in TRACES.**	

Audit 2015-7436 of 22 June 2015 in order to evaluate the official controls on consignments in transit		
Recommendation	Basis for assessment	Current Status
2015-7436-1 To ensure that instructions on the replacement of certificates are documented as required by Article 8(1) of Regulation (EC) No 882/2004.	This recommendation is based on conclusion No. 26 and related findings (No. 9 and 10) of the audit report that the staff of BIP accept explanatory letters when discrepancies are found during documentary checks of transit consignments. This weakens the effectiveness of documentary checks as: a) in some cases discrepancies concern the health guarantees established in various models of certificates provided by the EU legislation, and b) no clear rules when the replacement and when the explanatory note should be accepted.	Closed due to action taken

Audit 2015-7436 of 22 June 2015 in order to evaluate the official controls on consignments in transit		
Recommendation	Basis for assessment	Current Status
Recommendation based on conclusion 26. Associated findings 9 and 10.	In its response NVWA stated that, by February 2016, it will amend working procedures. Procedures will explain when explanatory letters can be accepted and when replacement certificates should be requested instead, referring to the Guidelines for Design, Production, Issuance and Use of Generic Official Certificates (CAC/GL 38-2001), issued by the Codex Alimentarius Commission. Considering a transitional period for communication with operators, the procedures will be applied from 1 March 2016. During the 2016 GFA NVWA stated that it amended the procedure BPR-18 (documentary checks at BIP). Section 3.4 (the first bullet point) and Annex II to the procedure contain instruction for officials on actions to be taken when discrepancies are found during documentary checks. The official carrying out checks can refuse the consignment, request new certificate or additional statement. NVWA provided copy of the procedure BPR-18.	
2015-7436-2 To ensure the official controls are appropriate and effective in verifying the traceability of the consignments stored in the customs/free warehouses/ship suppliers as required by the Article 4(2)(a) Regulation (EC) No 882/2004. Recommendation based on	This recommendation is based on conclusion No. 45 and related findings (No. 35, 36 and 37) of the audit report that although the BIP staff carry out controls quantitative checks on consignments and good in transit temporarily stored in warehouses, it does not cross-check other information. This leads to situations where some information concerning the goods stored do not match with the information stored in the operators' database for the same consignment, e.g.: the origin of the consignments and CVED numbers are not correct. this approach may, potentially, compromise the overall system of official controls at the warehouses. In its response NVWA stated that it will amend the instruction concerning controls during the storage in customs/free warehouses/ship suppliers. Following the amended official staff will	Closed due to action taken

Audit 2015-7436 of 22 June 2015 in order to evaluate the official controls on consignments in transit		
Recommendation	Basis for assessment	Current Status
conclusions 45. Associated findings 35, 36 and 37.	compare the data supplied by the operator with official data available to identify the deficiencies described in the report and to increase the effectiveness in verifying the traceability of the stored consignments. The amended instruction will apply from 1 December 2015. During the 2016 GFA NVWA stated that it amended instruction on controls in storage facilities and provided copy of the instruction. Amended instruction (part 3) foresees that the NVWA staff will carry out random (sample-approach) cross-checks on consignments present in the warehouses. The new approach prescribes that controls are done based on NVWA information and cross-checked against the information available by the warehouse operator. The instruction is in force from January 2016.	

Audit 2015-7438 of 06 May 2015 in order to evaluate the application of re-enforced checks on imported products of animal origin		
Recommendation	Basis for assessment	Current Status
2015-7438-1 To ensure that the planning process for the preparation of the monitoring plan for imported goods is risk based as required by Article 3 of Regulation (EC) No 882/2004. Recommendation based on conclusion 13.	This recommendation is based on conclusion No.: 13 and related findings (No.: 1 and 6) of the audit report that despite a monitoring plan in place, the absence of a risk-based rationale for the design and content of the plan does not ensure that the plan covers all relevant commodities and the related risks. In particular, border rejected consignments due to documentary discrepancies [not recorded in Rapid Alert System for Food and Feed (RASFF)] are not targeted for future checks. Moreover some tests for residues of veterinary medicinal mroducts (VMP) and microbiological factors are targeted with no sound rationale (e.g. testing for *Trichinella* in horse meat, for beta-agonists in chicken meat or excluding from testing honey or egg products, for which the Netherlands is the main country of introduction into the	Closed due to action taken

Audit 2015-7438 of 06 May 2015 in order to evaluate the application of re-enforced checks on imported products of animal origin		
Recommendation	Basis for assessment	Current Status
Associated findings: 1 and 6.	EU). In its response NVWA stated that: a) Regarding residues controls: NVWA developed and implemented the National Plan on Residues of Veterinary Drugs (NPR) pursuant to the Council Directive 96/23/EC. NPR reflects the criteria established in Annexes II and IV to the Directive and in associated Commission Decision 97/747/EC. NVWA monitor imported products pursuant to the Directive and sampling is carried out in a targeted way. As the Directive does not establish the threshold for sampling NVWA tests 1% of imported batches. When planning for NPR, NVWA takes into account the most commonly used VMP, especially these used in the country by veterinarians. The risk assessment is based on the owner/supplier history and the product. The Dutch NPR scope covers different groups of substances and, within these, a wide range of individual substances. In previous years, monitoring for heavy metals in imported fresh fish has increased as these substances were regularly being found in imported fish. Risk assessments from the Office for Risk Assessment are, if available, included in the NPR planning and import monitoring. This has resulted, for example, in a higher sampling frequency for phenylbutazone in imported horse meat. The National Plan Working Group, which meets several times a year, plans and monitors the NPR (records of their discussions are available). The Group plans to include in the 2016 NPR both, imported egg products and honey, and to target the groups of substances listed for these products in the Directive 96/23/EC. b) Regarding microbiological controls: NVWA based the control plans for microbiology on	

Audit 2015-7438 of 06 May 2015 in order to evaluate the application of re-enforced checks on imported products of animal origin		
Recommendation	Basis for assessment	Current Status
	the nature of the products and associated risk. The risk assessment is based on the results of past monitoring results, outbreaks, notifications (including RASFF) and scientific literature. Moreover, the frequency, the number of incoming batches and the findings of previous monitoring are taken into account. The risk assessment, together with the resulting justification, will henceforth be documented more explicitly in the project plans. During the 2016 GFA NVWA stated that: a) A working group (that meets several times per year) establishes the scope of the National Residue Monitoring Programme. The 2016 Programme for imported eggs and honey focuses on substance groups referred to in Directive 96/23/EC (honey - 10 samples for antibiotics and amitraz, eggs products - 6 samples for antibiotics, nitrofuran and coccidiostats). NVWA presented copies of the Working Group minutes. Also it indicated that based on risk assessment results in the past it intensified monitoring of certain substances (i.e. heavy metals in large tropical fish, phenylbutazone in horse meat). b) NVWA sets up the control plans for microbiology on the nature of the products and associated risk. The risk assessment is based on the results of past monitoring results, outbreaks, notifications (including RASFF) and scientific literature. NVWA statred that the project plan for microbiology 2017 will contain the risk assessment constituting more explicit justification for the choice of products and risks they represent.	

Audit 2015-7438 of 06 May 2015 in order to evaluate the application of re-enforced checks on imported products of animal origin		
Recommendation	Basis for assessment	Current Status
2015-7438-2 To carry out veterinary checks in order to confirm or rule out suspicion that the EU legislation has not been complied with, following the procedure of Article 24 and in accordance with Article 20 of Council Directive 97/78/EC. Recommendation based on conclusions 26 and 39. Associated findings:19, 24 and 33.	This recommendation is based on conclusions (No.: 26 and 39) and related findings (No.: 19, 24 and 33) of the audit report that the BIP staff take samples only from consignments which are already subject to EU safeguard decisions, despite they could take samples in case of suspicion. The absence of "in case of suspicion" sampling other than the ones subject to EU safeguard decision, together with the limited scope of the monitoring plan, undermines the effectiveness of the official control system. Moreover, the competent authority's decision not to apply re-enforced checks on consignments falling between the 11th to 30th is not in line with the Guidance on re-enforced checks, thus does not fulfil the objective of the legislation to confirm or rule out suspicion. This approach also has an impact on the consistency of the controls at EU level, as consignments that would normally undergo detention, and possibly testing, in the rest of the Member States do not undergo these controls in the Dutch BIPs. In its response NVWA stated that the BIP staff will receive access to resting results of samples taken in the context of "special projects"; these will be recorded in TRACES. The BIP staff will be encouraged to take action (including detention and sampling) "in case of suspicion" for consignments other than those already subjected to the European safeguard measures, pursuant to Article 20 of Directive 97/78/EC. NVWA has reconsidered the decision on reinforced checks between the 11th and the 30th consignment and decided to follow the Commission's guidelines in this respect. Respective operating instruction will receive amendments. NVWA expects the new procedure to be implemented by June 2016. During the 2016 GFA NVWA stated that it amended operating instruction (No. 418) on imported consignments and reinforced checks, and passed it to the BIPs' staff. The instruction	Closed due to action taken

Audit 2015-7438 of 06 May 2015 in order to evaluate the application of re-enforced checks on imported products of animal origin		
Recommendation	Basis for assessment	Current Status
	is in line with the Commission's guideline. In brief, if a non-compliant consignment triggered consecutive checks, the checks are over if all ten consecutive results of these checks are compliant. However, if the analytical results of these checks are not available before some new consignments arrive, checks continue for consignments 11 to 30. This approach is implemented from the beginning of 1 July 2016. NVWA informed the operators about the new approach. NVWA re-adjusted the 2016 national residue plan to accommodate potentially collected samples. NVWA provided copy of amended instruction, the note endorsing reinforced checks, copy of the 2016 readjusted national control plan for residues and an example of communication letter to operators. The NVWA stated during GFA that samples can be taken "in case of suspicion" for consignments other than those already subjected to the European safeguard measures, pursuant to Article 20 of Directive 97/78/EC. It was indicated that instruction is available for BIPs' staff, but so far no samples have been taken under this provision.	

2.B.4 Feedingstuffs and animal nutrition

Audit 2011-8943 of 04 April 2011 in order to evaluate the implementation of measures concerning official controls on feed legislation		
Recommendation	Basis for assessment	Current Status
2011-8943-4 To ensure that farms falling under Annex II to Regulation (EC) No	This recommendation is based on conclusion in Section 5.5.1.1 and related findings in the Section of the audit report that the competent authority does not have complete knowledge of certain activities such as on-farm mixing for calves and poultry or the use of premixtures and	In Progress Post GFA

Audit 2011-8943 of 04 April 2011 in order to evaluate the implementation of measures concerning official controls on feed legislation		
Recommendation	Basis for assessment	Current Status
183/2005 are registered for the activities they perform, as required by Art. 9 of the said Regulation.	additives by farmers for on-farm mixers. This has implications on the organisation of official controls. During the 2013 GFA, the NVWA explained that the complete registration of all Annex II farms remains problematic, partly because there are no reliable sources of information. NVWA modified the Annual Agricultural Survey questionnaire by adding two questions on the use of additives / premixtures. Nonetheless, NVWA still needs to assess if the answers are reliable or comprehensive. In addition, NVWA modified inspection lists / questionnaires for the primary and industrial companies with regard to supply of additives / premixtures to primary businesses. NVWA was also investigating if the industry ICQ-quality system could provide more information. In addition, the regular controls at farm level and industry level will continue to gather relevant information. During the 2016 GFA NVWA stated that it identified poultry and pigs holdings as the one using the most on-farm-mixers and / or additives and premixtures. In consequence, between 2013 and 2015, it launched a specific projects focused on such farms. As result of the project NVWA noted that the vast majority of holding operators found more beneficial to use a "ready to use feed" (provided by traders or feed mills) or switch to complementary feed rather than to use premixtures or additives, as such change costs operators less burden. NVWA took advantage of the project and instructed holding operators to notify if they use premixtures and/or additives. According to NVWA there are approximately 6,000 and 2,500 of pig and poultry holdings, respectively and about 20 feed material traders and 17 feed producing companies. NVWA plans, yet in 2016, to start with re-registration project. Between the others, the project	

Audit 2011-8943 of 04 April 2011 in order to evaluate the implementation of measures concerning official controls on feed legislation		
Recommendation	Basis for assessment	Current Status
	foresees establishing close cooperation and direct exchange of information with all compound feed producers and feed materials traders located in the country. In 2017 NVWA is going to begin a project about the relation between traders in feed additives and Annex II farms. The project should finish by the end of 2017. **Assessment: In order to fully address this recommendation NVWA should present a list of farms, falling under Annex II to Regulation (EC) No 183/2005, registered for the activities they perform.**	
2011-8943-5 To complete the publication of lists of registered feed establishments and to ensure that the activities for which these establishments have been approved or registered are specified, as required by Art. 19 of Regulation (EC) No 882/2004.	This recommendation is based on conclusion in Section 5.5.1.2 and related findings in Sections 5.5.1.1 and 5.5.1.2 of the audit report that publicly available lists of registered feed establishments usually do not specify the activities for which the feed establishments had been registered or approved. During the 2013 GFA NVWA stated that published lists of approved feed establishments are available and provided links to these lists. NVWA undertook to continuous to include all relevant companies on the published lists and add information on activities they perform. NVWA undertook several joined initiatives, namely with the Product Boards on Animal Feed, the Chambers of Commerce and the Municipal Administration of Databases, and the industry's quality scheme - GMP Plus. Initiatives focused on assurance that feed producing establishments are registered and their activities are correctly reflected. During the 2016 GFA NVWA stated that between 2014 and 2016 the web page received some modifications and therefore links provided previously do not work.	Closed due to action taken

Audit 2011-8943 of 04 April 2011 in order to evaluate the implementation of measures concerning official controls on feed legislation		
Recommendation	Basis for assessment	Current Status
	Also in 2014 and 2015 NVWA run a re-registration project for feed producing operators. NVWA introduced a new model of e-approval and all operators had to obtain approval in the new way. NVWA communicated this to operators in December 2014. As a result NVWA got 2,615 requests for re-registration. During the 2016 GFA 1,987 operators were registered; 628 revoked registration due to discontinuing the business, etc. NVWA estimates that it captured more than 90% of operators and remaining percentage represents only recently established companies. NVWA intends to continue with e-approval and through other projects, running in parallel in the feed sector, to identify potentially missing operators. NVWA presented a link to registered feed establishments**.**	
2011-8943-9 To ensure that the requirements of Art. 6 of Regulation (EC) No 767/2009 applicable to packaging materials in feed are complied with.	This recommendation is based on conclusion in Section 5.7.3 and related finding in the Sections of the audit report that a tolerance level for packaging material residues in feed is not in line with the provisions of Art. 6 of Regulation (EC) No 767/2009 which do not allow for maximum permitted level. During 2013 GFA NVWA underlined that the first principle applied in the feed material recycler sector is to avoid the presence of packaging materials. Secondly, NVWA does not allow for dilution practices to reduce the content of packaging materials; this is in line with the existing *Code of practice* by the feed industry. In 2012 none of the NVWA inspections identified dilution practices. NVWA provided the GFA audit team with a copy of the industry *Code of practice*. NVWA carries out controls at food recycling companies and takes samples. Annually 50 samples are collected to monitor the presence of residues of packaging materials in feed. NVWA uses validated analytical method for detection and quantification of packaging	Closed for other reasons

Audit 2011-8943 of 04 April 2011 in order to evaluate the implementation of measures concerning official controls on feed legislation		
Recommendation	Basis for assessment	Current Status
	materials in feed developed by the RIKILT Research Institute. The method has the quantification limit of 0.01% w/w at the contamination level of 0.15% w/w (the weight of packaging materials in weight of the feed material). NVWA stated that 0.15% w/w reflects the content of residues of packaging materials in feed that, in accordance with some other Member States risk assessments, does not pose a risk to public health. During the 2016 GFA NVWA stated: 1) Packaging materials in feed are prohibited and NVWA controls regularly (by means of inspections and sampling) if operators comply with this provision lay down in Art. 6 of Regulation (EC) No 767/2009. 2) NWVA uses method, validated by RIKILT, that currently is the only official method available that can be effectively used and its results can sustain in the court, if needed. 3) NVWA has in place enforcement measures if the presence of packaging materials in feed material exceeds 0.15% w/w. NVWA presented the RIKILT report containing details on how the method has been developed and validated. *Assessment: This issue is to be further discussed with other EU Member States as methods available are limited by their detection limits; this recommendation is "Closed for other reasons".*	

Audit 2013-6753 of 10 September 2013 in order to evaluate measures in place for the identification of hazards and management of risks along the feed chain including for oils, fats and products derived thereof		
Recommendation	Basis for assessment	Current Status
2013-6753-1 To ensure that reports on official controls include details on the control methods applied, notably on the type of information used to conclude whether a requirement is complied with or not, as laid down by Article 8(1) of Regulation (EC) No 882/2004.	This recommendation is based on conclusion in Section 5.1.3 and related finding in the Section of the audit report that inspection reports produced usually do not contain the necessary information to justify on what basis the operator's / establishment's compliance is fulfilled or not. In its response NVWA stated that it had produced an improvement plan for the quality of the NVWA activities and additional further improvement will take place. During the 2016 GFA NVWA stated that in 2013 / 2014 it organised training for inspectors and particular focus was put on meaningful recording of findings in the inspection reports. NVWA repeated this training in 2014 / 2015 for newly appointed inspectors. To ensure quality and consistency NVWA appointed a team that verifies all the feed inspection reports. The team comprises experienced feed inspectors. If inspection report contains some flaws the team consults the matters directly with the feed inspector that had written the report. For 2017 NVWA plans to organise another training during which inspectors will learn how to describe evidence so these could serve better for administrative measures. In addition NVWA developed a new IT tool - INSPECT database - that is aimed to improve electronic way of recording inspection findings. NVWA expects the system to be operational in 2017. NVWA presented training programmes organised between 2013 and 2015 and examples of	Closed due to action taken

Audit 2013-6753 of 10 September 2013 in order to evaluate measures in place for the identification of hazards and management of risks along the feed chain including for oils, fats and products derived thereof		
Recommendation	Basis for assessment	Current Status
	the inspection reports for which further consultations with their authors took place**.**	
2013-6753-2 To implement procedures for the verification of the effectiveness of official controls, as laid down by Article 8(3)(a) of Regulation (EC) No 882/2004.	This recommendation is based on conclusion in Section 5.1.4 and related finding in the Section of the audit report that verification of the effectiveness of official controls is on a very early stage. This results in very limited verification of the efficiency of official controls along the feed chain. This, combined with the limited value of the feed-back from check-lists and inspection reports (see recommendation 2013-6753-1), makes the use of these records for verification purposes difficult. In consequence, it does not allow detecting any potential problems affecting the quality of official controls, in particular inspections. In its response NVWA stated that it produced an improvement plan for the quality of the NVWA activities. NVWA would like these to cover at the same time the quality of inspection reports and verification of the effectiveness of official controls. During the 2016 GFA NVWA stated that actions undertaken to address recommendation No.: 2013-6753-1 have been aimed also to address this recommendation. By verification on quality of inspection reports the verification team gets aware of issues that require further improvement. These elements are addressed during direct consultations with inspectors. These are also used as didactic material for training. NVWA developed a procedure (and a guideline) to measure effectiveness of official controls and introduced, in Multi-annual National Control Programme (MANCP), a dedicated section for reflecting this issue (4.6). NVWA run and completed a project on verification of effectiveness of official controls	Closed due to action taken

Audit 2013-6753 of 10 September 2013 in order to evaluate measures in place for the identification of hazards and management of risks along the feed chain including for oils, fats and products derived thereof		
Recommendation	Basis for assessment	Current Status
	targeted on pig feed containing copper. Yet in November 2016 NVWA plans to introduce verification of effectiveness of official controls across the entire organisation. NVWA presented copy of the procedure and the guideline and copy of the MANCP with the new section**.**	
2013-6753-3 To ensure that lists required by Article 19 of Regulation (EC) No 183/2005 reflect the activities for which establishments have been registered or approved.	This recommendation is based on conclusion in Section 5.1.5 and related finding in the Section of the audit report that the information on the lists of establishments (available to the public) is limited and this does not allow to know for which specific activities these establishments are approved or registered. In its response NVWA stated that one the transfer of tasks from the Product board Animal Feed to the NVWA takes place, the official registration of feed business operators will be accommodated by the NVWA from the 1st of January 2015. NVWA undertook several initiatives in liaison with the Product Boards on Animal Feed, the Chambers of Commerce and the Municipal Administration databases and the industry's quality scheme - GMP Plus. Initiatives focused on assurance that feed producing establishments are registered and their activities are correctly reflected. During the 2016 GFA NVWA stated that between 2014 and 2016 the web page received some modifications and initially published links do not work. Also in 2014 and 2015 NVWA run re-registration project for feed producing operators. NVWA introduced a new model of e-approval and all operators had to obtain approval in the new way. NVWA communicate this to operators in December 2014. As a result NVWA got 2,615 requests for re-registration.	Closed due to action taken

Audit 2013-6753 of 10 September 2013 in order to evaluate measures in place for the identification of hazards and management of risks along the feed chain including for oils, fats and products derived thereof		
Recommendation	Basis for assessment	Current Status
	During the GFA 1,987 operators were registered; 628 revoked registration due to discontinuing the business, etc. NVWA estimates that it captured more than 90% of operators and remaining percentage represents only recently established companies. NVWA intends to continue with e-approval and through other projects, running in parallel in the feed sector, to identify potentially missing operators. NVWA provided the links to registered feed establishment**.**	
2013-6753-4 To ensure that the labelling of products clearly indicates whether they are intended for feed or for other purposes, as laid down by Article 5(2) of Regulation (EC) No 183/2005 and Annex II to the said Regulation.	This recommendation is based on conclusion in Section 5.2.1 and related finding in the Section of the audit report that the labelling of certain products deriving from some establishments handling oil derived products, does not always mention if the products are destined for feed production or for other uses. This makes more difficult for the competent authorities to detect products intended for other uses but channelled into the feed chain. In its response NVWA stated that correct labelling would be part of the 2014 control programme. During the 2016 GFA NVWA stated that, in 2016, it carried out a project on traceability and labelling of oils / fats. The aim was to verify if operators when handling these products use proper description (also indicating the use) and if the traceability is ensured. The project concluded that, except of one case of non-compliance (submitted to fraud investigation), the sector operators comply with the rules. NVWA intends to continue in this direction and launch the project on industry enforcement	Closed due to action taken

Audit 2013-6753 of 10 September 2013 in order to evaluate measures in place for the identification of hazards and management of risks along the feed chain including for oils, fats and products derived thereof		
Recommendation	Basis for assessment	Current Status
	(will take place in 2017) and develop a web page explaining the rules for labelling of fats / oils. NVWA presented copy of the traceability and labelling project report with outcome**.**	
2013-6753-5 To ensure that containers used for storing or transporting feed are effectively cleaned to avoid cross-contamination after being used for storing or transporting products intended for other uses, as laid down by Article 5(2) of Regulation (EC) No 183/2005 and Annex II to the said Regulation.	This recommendation is based on conclusion in Section 5.2.2 and related finding in the Section of the audit report that official controls pay attention to the separation between products intended for other uses and those intended to be used in feed. However, in the establishment where this separation was deemed not to be always possible, official services did not take into account to what extent operator's cleaning procedures were effective. As a consequence, the absence of cross-contamination at this level cannot be ruled out. In its response NVWA stated that check on cleaning of containers used for transport or storage in order to avoid cross contamination will be part of the 2014 control program. During the 2016 GFA NVWA stated that all operators dealing with feed, including transporters, are subjected to quality schemes of which the vast majority follow the GMP Plus scheme. NVWA examined the GMP Plus scheme provisions covering the cross-contamination issues (for containers used for storing or transport of feed) and concluded that such provisions satisfactorily address the cross-contamination issues. NVWA requested feed inspectors to verify, during official controls, if feed operators, including transporters, comply with these provisions. Inspectors received guideline in this respect. In addition NVWA liaises with the GMP Plus scheme from which it obtains information on operators not complying with the provisions.	Closed due to action taken

Audit 2013-6753 of 10 September 2013 in order to evaluate measures in place for the identification of hazards and management of risks along the feed chain including for oils, fats and products derived thereof		
Recommendation	Basis for assessment	Current Status
	NVWA presented copy of the inspection reports covering verification of the GMP Plus provisions preventing cross-contamination and the guidance provided to feed inspectors**.**	
2013-6753-6 To carry out official controls on the requirements concerning dioxin monitoring, as laid down by Article 5(2) of Regulation (EC) No 183/2005 and Annex II to the said Regulation.	This recommendation is based on conclusion in Section 5.2.3 and related finding in the Section of the audit report that official controls are not in a position to ensure that the operators' obligations concerning dioxin monitoring are met. This is due to the fact that routine inspections in those establishments requiring undertaking the dioxin monitoring, do not include yet checks on this aspect. The NVWA project covering checks on the dioxin monitoring requirements is at a very early stage of implementation. Regardless of the above this gap in official controls is mitigated by the fact that operators routinely perform this monitoring in accordance with the relevant legal requirements and the results thereof have not shown any non-compliances related to the dioxins level. In its response NVWA stared that controls of the requirements of dioxin monitoring for compound feed establishments will be part of the 2014 control programme. During the 2016 GFA NVWA stated that it established a project aimed at two objectives: a) checking on traceability of fats / oils, including verification whether operators own-checks are reliable and carried out in accordance with their risk assessments (HACCP based procedures), or not, and b) verification if laboratories, analysing for dioxin monitoring samples of fats / oils destined to the feed chain, notify non-compliant results to NVWA. The project will continue in 2017 and will cover also private laboratories of the feed industry (especially these not performing well in the past).	In Progress Post GFA

Audit 2013-6753 of 10 September 2013 in order to evaluate measures in place for the identification of hazards and management of risks along the feed chain including for oils, fats and products derived thereof		
Recommendation	Basis for assessment	Current Status
	Assessment: In order to fully address this recommendation NVWA should demonstrate that operators dealing with fats / oils comply with their obligations concerning monitoring on dioxins.	

2.B.5 TSE\ABP

Audit 2012-6478 of 19 June 2012 in order to evaluate the implementation of requirements for organic fertilisers and soil improvers		
Recommendation	Basis for assessment	Current Status
2012-6478-2 To ensure that the requirements for the mixing of OF/SI required by Article 22(3) of Regulation (EU) No 142/2011 are implemented.	This recommendation is based on conclusion in Section 5.4 and related finding in Section 5.4.2 of the audit report that operators place on the market organic fertilisers / soil improvers (OF/SI) without mixing them with a component which renders the mixture unpalatable or otherwise is effective in preventing misuse for feeding purposes. During the 2013 GFA NVWA stated that in January 2013 a new national legislation reflecting the EU legislation and listing mixing components (in article 3.18, point 2) was published. Moreover, NVWA amended inspection lists for inspections on OF/SI so these contain an item on the use of mixing components. Inspections are planned to be carried out between May and October 2013. NVWA stressed that an enforcement policy on this issue is not in place, as this subject is being discussed in a European Commission working group. Difficulties lay with identification	Closed for other reasons

Audit 2012-6478 of 19 June 2012 in order to evaluate the implementation of requirements for organic fertilisers and soil improvers		
Recommendation	Basis for assessment	Current Status
	of the substance that, when added to OF/SI, renders the mixture unpalatable or otherwise is effective in preventing misuse for feeding purposes. During the 2016 GFA NVWA stated that despite of the lack of the component being identified yet, NVWA amended the procedure on OF/SI controls and introduced requirements to check if operators add some materials mitigating OF/SI palatability, as required by the EU and the Dutch legislation. NVWA presented the procedure with relevant check list and correspondence with Directorate F of the DG SANTE. *Assessment: This issue has been identified also in other EU Member States. It has been confirmed that, currently, there is no substance found, that would render OF/SI unpalatable. Due to inability to date to identify the suitable components this recommendation is "Closed for other reasons".*	
2012-6478-3 To carry out official controls on plants and operators along the chain of OF/SI, notably transporters and traders, as required by Article 32 of Regulation (EU) No 142/2011.	This recommendation is based on conclusion in Section 5.5 and related finding in the Section of the audit report that although official controls were organised to ensure the absence of diversion of OF/SI into the feed chain, the inspection programme does not include all operators along the OF/SI chain, namely: transporters and traders. During the 2013 GFA NVWA stated that it has started already preparing the project document that will determine the number of inspections based on risk analysis. The inspections on transporters are scheduled to take place in the period between May and November 2013 and inspections of traders between May and June 2013. During the 2016 GFA NVWA stated that in 2013 it initiated a three-phase project to identify transporters and traders acting along the OF/SI chain. In consequence NVWA doubled the	Closed due to action taken

Audit 2012-6478 of 19 June 2012 in order to evaluate the implementation of requirements for organic fertilisers and soil improvers		
Recommendation	Basis for assessment	Current Status
	number of such operators in comparison to the number from 2012. The outcome of the project revealed that the majority of traders trade OF/SI packed in bags up to 50 kg and the majority transporters transport manure. Only few operators from these two groups deal with OF/SI containing processed animal proteins (PAP) or hydrolysed proteins. NVWA, via agricultural account addressed to land owners and growers, introduced a question on the use of OF/SI containing PAP and hydrolysed proteins. Positive matches are subject to controls. NVWA identified five operators that use such OF/SI and keep farm animals. NVWA included transporters and traders acting along the OF/SI chain in the annual inspection programme 2015 / 2016. In 2017 NVWA will focus controls on illegal transport of manure. NVWA engaged the two biggest sector organisations in the process of registration of transporters. NVWA presented correspondence in this respect and copy of the inspection protocol.	

2.B.6 Veterinary medicines and residues

There are no recommendations currently open for follow-up.

2.B.7 Foodstuffs and food hygiene

Audit 2012-6312 of 19 November 2012 in order to evaluate the official controls of genetically modified organisms, including their deliberate release into the environment		
Recommendation	Basis for assessment	Current Status
2012-6312-2 The obligations established for feed and food business operators or their representatives referred to in Article 3 of Decision 2011/884/EU are met in order to ensure compliance with the requirements of Article 5 of the same Decision.	This recommendation is based on conclusion in Section 5.2.6 and related finding in the Section of the audit report that system in place is not capable of ensuring that all consignments requiring pre-notification are actually notified by operators as needed. In consequence the competent authority cannot ensure that imported products are subject to documentary checks and meet the relevant import conditions. In its response NVWA stated that NVWA has informed and instructed operators on their obligation in respect to, between the others, pre-notification. The checks on all documents (common entry document, health certificate and analytical report) take place at the moment of arrival. At that stage of the documentary check the Customs staff determine if the analytical report and health certificate are present and if they are in compliance with the Decision 2011/884/EU. During the 2016 GFA the NVWA stated that code Y063 was introduced by TAXUD on 1-2-2016 to identify rice consignments that do not come from China. Until that time there was a national code 1800 used to identify such consignments. NVWA provided an overview report of the notifications with 1800 code for years 2014-2015 in which importers declared that the relevant consignments do not contain Bt63 rice. NVWA presented information that in 2014 eleven consignments containing rice from China were declared under the code C678 and were subject to documentary and physical controls (all of them were pre-notified).	Closed due to action taken

Audit 2012-6312 of 19 November 2012 in order to evaluate the official controls of genetically modified organisms, including their deliberate release into the environment		
Recommendation	Basis for assessment	Current Status
2012-6312-3 The import conditions established in Article 4(2) of Decision 2011/884/EU are met. In particular that the import of products referred in Annex I to this Decision without analytical report and health certificate is allowed only when these documents are replaced by a declaration issued by the operators indicating that the food or feed is not containing, consisting or produced from rice.	This recommendation is based on conclusion in Section 5.2.6 and related finding in the Section of the audit report that system in place allows products (referred to in Annex I to Decision 2011/884/EU) to be imported without the analytical report and health certificate based on oral statements made by the operators, even though the written statement is required. In its response NVWA stated that during documentary checks the Customs would verify if the declaration is handed over with other documents (analytical report and health certificate). NVWA did not indicate the time frame for corrective actions to be implemented. During the 2016 GFA the NVWA stated that by using customs codes (1800 and since 2016 - Y063) consignments not containing rice from China had been identified (declared by importers in the system). These consignments were not subject to documentary and physical controls. All other consignments containing rice from China that fall under code C678 were subject to documentary and physical controls (2014-11, 2015-1, 2016 (1-9 months) -18). NVWA stated that no rice consignments had been imported without analytical report and health certificate. NVWA presented database which contain all information related to such consignments.	Closed due to action taken
2012-6312-4 The laboratory capacity is adequate	This recommendation is based on conclusion in Section 5.2.9 and related finding in the Section of the audit report that the capacity of the laboratories is not adequate to handle both	Closed due to action taken

Audit 2012-6312 of 19 November 2012 in order to evaluate the official controls of genetically modified organisms, including their deliberate release into the environment		
Recommendation	Basis for assessment	Current Status
to analyse both samples taken under Decision 2011/884/EU and samples from the controls of food products as required by Article 4(2)(c) of of Regulation (EC) No 882/2004.	samples from the Chinese rice controls and samples from the controls of food products. In its response NVWA did not provide an action plan indicating what measures it is going to undertake to address this recommendation. During GFA the NVWA indicated that there are no problems with laboratory capacity as since 2013 the amount of imported consignments containing rice from China decreased dramatically (one of the most likely reasons is that importers source rice and rice products from other countries). NVWA stated that the number of food samples taken and analysed for genetically modified organisms - GMO on the market was the following: 2013: 222, 2014:223, 2015:216, 2016 (the first 9 months):149.	

Audit 2015-7451 of 17 March 2015 in order to evaluate the official controls in primary production of food of non-animal origin		
Recommendation	Basis for assessment	Current Status
2015-7451-1 Ensure that official controls relating to microbiological contamination in primary production FNAO at producer level are carried out regularly on a risk-basis, with	This recommendation is based on conclusions No.: 9 and 16 and related findings (No.: 6, 13 and 14) that the overall scope of official controls is inadequate as it does not sufficiently take into account the risks of microbial contamination at the primary production stage; the competent authority recognised this deficiency and undertook to address it. In its response NVWA stated that:	In Progress Post GFA

Audit 2015-7451 of 17 March 2015 in order to evaluate the official controls in primary production of food of non-animal origin		
Recommendation	Basis for assessment	Current Status
appropriate frequency as required by Articles 3 and 4 of Regulation (EC) No 882/2004. Recommendation based on conclusions No 9 and No 16. Associated findings No 6, No 13, No 14	a) NVWA will review and audit the Global Gap 5.0 system to assess whether the Global Gap 5.0 quality system is fit for this purpose or not. NVWA expects that every company will be audited by Global Gap from 01-07-2016 onwards. b) NVWA will carry out a Pilot inspection Programme in 2016 focussing on the microbiological contamination and giving special attention to awareness of the producers. c) NVWA will further strengthen co-operation with laboratories and when non-compliant results are found at the level of retail or wholesale, follow up inspections will be carried out at the level of the primary producer. Implementation deadline: 01-01-2016. During the 2016 GFA NVWA stated the following: ad. a) NVWA reviewed if the audit program of Global Gap 5.0 covers the demands of the Hygiene Protocol (852/2004) and concluded that all items listed in the Hygiene Protocol are reflected in Global Gap program 5.0. Moreover all important items mentioned in the Hygiene Protocol are also marked as major in the Global Gap audit program. ad. b) In December 2015 NVWA and in August 2016 NVWA carried out inspections in 14 greenhouses and 13 farms with outdoor crops, respectively. NVWA selected operators growing products consumed as raw and inspections focused at compliance with the Hygiene Protocol 852/2004). NVWA concluded that greenhouses operators were aware of the risks of contamination of the plants with plant diseases and it had positive impact on the compliance with the items of the Hygiene Protocol; the outdoor crops producers used irrigation systems preventing direct contact of water with products to be consumed, and did not use manure for fertilization. Operators harvested crops mechanically. For products not processes at farms operators ensured traceability systems. NVWA plans to the project in 2017 and used its	

Audit 2015-7451 of 17 March 2015 in order to evaluate the official controls in primary production of food of non-animal origin		
Recommendation	Basis for assessment	Current Status
	outcome to set up risk factors ad. c) NVWA sampled several types of products at retail and / or wholesale level (mixed vegetables, lettuce, sprouts, fruit salad and soft fruits). Analysis of the samples in the laboratory did not result into control actions. There were no samples found which exceeded the limits for microbiological contamination, thus no follow-up was carried out. NVWA presented an review of Hygiene Protocol and Global Gap 5.0, evaluation of Pilot Inspection Program and sampling statistic (types of products and number of lots sampled). **Assessment: Although NVWA presented a general overview on organisation of official controls in the FNAO primary production, it did explain neither its risk-based approach nor regularity and the frequency.** **In order to fully address this recommendation, NVWA should present its risk assessment policy and factors justyfying the scope of official controls , their regularity and the frequency .**	
2015-7451-2 Ensure that official controls include the traceability and certification requirements for imports into the EU of sprouts and seeds intended for the production of sprouts as required by Regulation (EU) No 211/2013.	This recommendation is based on conclusions No.: 35 and related findings (No.: 22, 24, 25, 27, 29 and 30) that some operators placed on the market seeds for sprouting and sprouts imported from non-EU countries although import certificates did not accompany consignments of these products. Moreover, officials in charge of official controls on such operators did not identify this non-compliance. In its response NVWA undertook the following:	Closed due to action taken

Audit 2015-7451 of 17 March 2015 in order to evaluate the official controls in primary production of food of non-animal origin		
Recommendation	Basis for assessment	Current Status
Recommendation based on conclusions No 35 Associated findings No 22, No 24, No 25, No 27, No 29 and No 30	a) To introduce control on the presence of import certificates at the sprouts producers' level. Deadline: in place from 01-01- 2016. b) To develop a dedicated list to assess the traceability of information at operators' level. c) To intensify official controls on packaging of seeds for sprouting. Traceability aspect will be taken into account. Deadline: in place from 01-01-2016. Beside the measures proposed, NVWA stressed that observation No. 31 (of the audit report) should be taken into account for this recommendation as it indicates the reasons and difficulties with proper implementation of the relevant requirements. NVWA stressed that it had presented own concerns about implementation difficulties when the legislation had been in its preparatory phase. Again it pointed out that although 97 CN codes are for seeds, no specific code indicates seeds for sprouting. During the 2016 GFA NVWA stated that in 2016 it carried out a dedicated project to establish whether operators handling sprouts or seeds for sprouting follow the requirements of the general hygiene provisions for primary production and comply with the traceability requirements. For that reason NVWA modified also a check-list adding questions on traceability and certification of imported products. The project covered operators such as seeds importers, seeds traders, sprouts producers, sprout traders, seeds for sprouting and sprouts retailers. Following the project NVWA concluded that there are 7 sprouting seeds operators in the country. Two out them directly import sprouting seeds and produce sprouts, are aware of certification requirements and comply with them. Remaining five are distributors of seeds	

Audit 2015-7451 of 17 March 2015 in order to evaluate the official controls in primary production of food of non-animal origin		
Recommendation	Basis for assessment	Current Status
	(mung beans) to retail and catering (oriental shops and for cooking). These seeds, as not destined for sprouting, do not require certification as the sprouting seeds. Nonetheless, NVWA took advantage of the project and reminded on certification requirements. NVWA presented the project protocol with the outcome and the list of sprouting seeds producers.	

2.B.8 Imports of food of plant origin

Audit 2011-8987 of 06 June 2011 in order to evaluate import controls on food of plant origin		
Recommendation	Basis for assessment	Current Status
2011-8987-8 Ensure that release for free circulation follow Article 10 of Regulation (EC) No 669/2009, and Article 7 (8) of Regulation (EC) No 1152/2009.	This recommendation is based on conclusion in Section 5.2.7 and related finding in Sections 5.2.4 and 5.2.7 of the audit report that not all necessary checks are conducted as foreseen in Regulation (EC) No 669/2009 and by Article 7(7).(8) of Regulation (EC) No. 1152/2009; and despite of import of guar gum and thereof products from India the competent authority do not foresee physical checks on consignments that contain between 10 % and less that 100% of guar gum. During 2013 GFA NVWA stated that in certain cases the customs authorities release consignments of food of non-animal origin for free circulation without physical checks (under customs procedure T1) and considers it sufficient for releasing consignment. In these cases, the CVED document is only partially completed. Approximately 1,000 consignments were	Closed for other reasons

Audit 2011-8987 of 06 June 2011 in order to evaluate import controls on food of plant origin		
Recommendation	Basis for assessment	Current Status
	released in this way in 2011. For consignments arriving to the Netherlands from Bulgaria authorities have arrangement in place for exchanging information. Nonetheless, NVWA undertook to instruct inspectors to comply with relevant legislation. In August 2013 the Commission Implementing Regulation (EU) No 323/2014 in order to fully reflect the provisions on onward transportation was amended. In consequence CVED, that has to be completed by FBOs and by the competent authority was modified. DG TAXUD in 2013 finalized a '*Commission Staff Working Document on the enforcement by national customs authorities of Regulation (EC) No 669/2009*' which clearly states that " Customs authorities can release for free circulation (Article 4(16)(a) of the Community Customs Code) consignments of commodities falling under the scope of Commission Regulation (EC) No 669/2009 only after they have checked that the CVED exists, that in Box II.14 it is indicated that the consignment is acceptable for release for free circulation and that Box II.21 has been signed". *Assessment: Although Regulation (EC) No.669/2009 remains in place, Regulation (EC) No. 1152/2009 and Regulation (EC) No. 258/2010 (covering guar gum) have been repealed by Regulation 884/2014 and by Regulation (EC) 175/2015, respectively. As changes of legislation have taken place this recommendation, therefore is "Closed for other reasons".*	

2.B.9 Plant protection products

There are no recommendations currently open for follow-up.

2.B.10 Animal welfare

Audit 2012-6376 of 21 May 2012 in order to evaluate the implementation of controls on animal welfare on farms and during transport		
Recommendation	Basis for assessment	Current Status
2012-6376-3 The CCA should continue with measures to achieve full compliance with group housing for sows by 1 January 2013, as required by Article 3 of Directive 2008/120/EC.	This recommendation is based on conclusion in Section 5.2.7 and related finding in Section 5.2.2 of the audit report that a communication strategy with the pig farming sector should be in place to give a clear message that the requirements for group housing of sows and gilts from 1 January 2013 will strictly enforce from that date. During the 2013 GFA NVWA stated that it focuses enforcement on farms selected from farmers' self-declarations and pre-inspections in 2012. Risk based selection identified 170 out 2,000 farms to be targeted. Compliance inspections started from the beginning 2013 and by mid-April a total of 60 farms received compliance orders. Deadline to comply is up to 3 months and contains penalties if farm fails to comply with the deadline. Penalties are related to farm economic status and range from 5,000 to 170,000 Euro. The ultimate deadline for all farms to comply is 1 July 2013. NVWA indicated that a very limited number of holdings requested an extension and judicial authorities had given an extension until 1 January 2014. *Assessment: This issue was taken over and followed up by other Commission services in context of general follow up of this requirement at the EU level in a form of the EU pilot (structured dialogue) on group housing of sows.* *The information received from the Animal Health and Welfare Unit (now in charge of the file), indicates that the Dutch authorities had provided comprehensive set of documentation on inspections carried out and sanctions imposed to achieve compliance with requirements for sows housing. The assessment of the documentation provided concluded that the Dutch authority had taken the necessary steps to ensure the Dutch holdings managed properly the*	Closed due to action taken

Audit 2012-6376 of 21 May 2012 in order to evaluate the implementation of controls on animal welfare on farms and during transport		
Recommendation	Basis for assessment	Current Status
	transition to group housing. In consequence this case has been closed on 12 May 2015.	
2012-6376-5 The CCA should ensure that from 1 January 2013 poultry over 5 kg live weight is not killed by mechanical dislocation of the neck, in accordance with Annex I, Chapter I, table 1, point 5 of Regulation (EC) No 1099/2009.	This recommendation is based on conclusion in Section 5.2.4 and related finding in the Section of the audit report that dislocation of neck was still in use as a method for killing birds over 5 kg. From 1 January 2013 this method should not be permitted. During 2013 GFA NVWA stated that killing by mechanical dislocation is no longer permitted for poultry over 5kg and the industry had received such information. For the second half of 2013 NVWA planned compliance checks in this respect at turkey farms. This recommendation was followed-up during the audit 2014-7078 in September 2014. NVWA indicated that during official controls at farms it was discovered that some farmers still used dislocation as method for killing. Those farmers did not agree with the method approved by the Parliament (stunning followed by neck dislocation). NVWA undertook to find a solution. During the 2016 GFA NVWA stated that the Ministry of Economic Affairs had presented own legal interpretation of Regulation (EC) No. 1099/2009. The opinion states that Regulation (EC) No. 1099/2009 does not apply to turkeys dispatch for destruction as turkeys are killed outside the slaughterhouse. The Ministry explained that proposal of the national legislation (Ministerial regulation) is under preparation. The regulation will provide a range killing methods for animals killed outside the slaughterhouse. The Ministry confirmed that for poultry above 5 kg of weight the mechanical dislocation of the neck made on its own will not be allowed. The regulation will stipulate killing methods for other species too. The Ministry expects the legislation to be in force by January 2018.	In Progress Post GFA

Audit 2012-6376 of 21 May 2012 in order to evaluate the implementation of controls on animal welfare on farms and during transport		
Recommendation	Basis for assessment	Current Status
	NVWA stated that the majority of turkey breeders use captive bolt device for stunning before killing and only some breeders do not use any stunning device. NVWA stressed that in the absence of national legislation it cannot apply measures if killing of poultry is by the neck dislocation only. **Assessment: In order to fully address this recommendation the Ministry should present copy of the legislation that does not list / does not allow the neck dislocation on its own as a killing method for poultry over 5 kg of weight.**	

Audit 2014-7078 of 16 September 2014 in order to evaluate the animal welfare controls in place at slaughter and during related operations		
Recommendation	Basis for assessment	Current Status
2014-7078-1 To enhance the supervision of OV's checks in slaughterhouses so that there is a more timely detection of non-compliances and enforcement of the requirements of Regulation (EC) No 1099/2009 and Directive 93/119/EC, particularly regarding the obligations of AWOs and BOs. Conclusions (and findings) upon which this recommendation is based: 27, 29, 31, 32,36, 38, 41, 43, 46-51,	This recommendation is based on findings (No. 27, 29, 31, 32, 36, 38, 41, 43, 46, 47 and 76) and associated conclusions from Section 5.2 (No. 48 - 51) and Section 5.5 (No. 77) of the audit report that: - Documented procedures do not explain how OVs should determine correctly the lairages' capacity. In consequence, some slaughterhouses are approved while the space for animals in lairages is too small. - Some of the animal welfare officers (AWOs) do not have a certificate of competence covering all tasks they supervise. - In large slaughterhouses, electrical stunning devices often are not connected to visual devices	In Progress Post GFA

Audit 2014-7078 of 16 September 2014 in order to evaluate the animal welfare controls in place at slaughter and during related operations		
Recommendation	Basis for assessment	Current Status
76 and 77. Legal basis for this recommendation: Article 4(2)(a) of Regulation (EC) No 882/2004, Articles 15(2) and 17(5) and Points 2.1 and 2.3 of Annex III of Regulation (EC) No 1099/2009 and Annex C Section 3.A.2(c) of Directive 93/119/EC.	in order to control parameters for animals stunning - Some OVs do not follow-up on the deficiencies detected during system inspections. In their response NVWA stated that, beginning from 2015, system audits on killing are planned for all slaughterhouses. Particular attention will be paid to electrical equipment in the large slaughterhouses and to the capacity of lairage facilities in all slaughterhouses. Moreover by 1 May 2015, NVWA undertook to amended operating procedures, in particular introduce to description on how the animal welfare checks should be carried out. This will also cover the tasks and responsibilities of the animal welfare operatives and the operators. In addition some AWOs will have to follow additional training in 2015. NVWA stated that a Good practice guide for small slaughterhouses for ungulates came into effect at the end of 2014. It contains appropriate guidance to help slaughterhouses establish their own standard operating procedures. Moreover, mechanical restraints for sheep in some slaughterhouses have been modified. NVWA stated that the 'improvement programme' implemented by 2015 is to provide good guidance on achieving more effective enforcement. During the 2016 GFA NVWA stated that implementation of system inspections on slaughtering (including checks on electric stunning) in all slaughterhouses failed in 2014 and 2015. In 2014 inspections took place in 11% of slaughterhouses for hoofed animals and 65% of slaughterhouses for poultry. In 2015 it was 16% and 25% respectively. The goal of one system inspection per year in each slaughterhouse remains unchanged and this will be more strongly monitored and prioritised throughout the year.	

Audit 2014-7078 of 16 September 2014 in order to evaluate the animal welfare controls in place at slaughter and during related operations		
Recommendation	Basis for assessment	Current Status
	NVWA up-dated working procedures for system inspections to be carried out in slaughterhouses for ungulates and farmed game, poultry and for rabbits. Where appropriate instructions refer to checks on c lassification, construction and equipment in lairages for keeping animals before slaughter, and the way electrical stunning should be carried out. All procedures related to system inspections are available at NVWA intranet: https://www.nvwa.nl/onderwerpen/dieren-dierlijke-producten/dossier/dierwelzijn/voorschriften-dierenwelzijn-preventie-en-export NVWA provided copies of projects for controls on animal welfare for 2015 and 2016 with supporting documents (checklists and principles), copy of the NVWA 2016 annual control programme, copies of working instructions for system inspections and some photos demonstrating the way of restraining and such equipment for small ruminants. **Assessment: In order to address fully this recommendation NVWA should present evidence that a) the new strategy - including animal welfare inspection and b) verification on training (in this respect) in all slaughterhouses has been implemented.**	
2014-7078-2 To extend the system for monitoring of broiler welfare so that the records of daily mortality rates are accompanying the broiler chickens to slaughterhouses when these birds are kept at stocking densities above	This recommendation is based on finding (No. 64) and associated conclusion from Section 5.4 (No. 70) of the audit report that a system for the monitoring foot pad dermatitis lack of information on the daily mortality rates, which is a tool to evaluate at what stage of the birds' life the animal welfare problems have occurred. In their final response (August 2015) NVWA stated that, beginning from 2015, the information on daily mortality rates will be sent to the slaughterhouse when required.	Action Still required Post GFA

Audit 2014-7078 of 16 September 2014 in order to evaluate the animal welfare controls in place at slaughter and during related operations		
Recommendation	Basis for assessment	Current Status
33kg/m². Conclusions (and findings) upon which this recommendation is based: 64 and 70. Legal basis for this recommendation: Point 1.1 Annex III of Directive 2007/43/EC.	During the 2016 GFA NVWA stated that it put no corrective action in place for this recommendation. The documentation accompanying the flock to the slaughterhouse contains cumulative daily mortality rate but no daily mortality rate. NVWA expressed opinion that daily mortality rate is available to official veterinarian in slaughterhouse on request, if necessary (animal welfare issues identified), but its regular delivery would cause unnecessary additional administrative burden. NVWA stressed that officials carrying out controls at farm level always verify daily mortality rates and check whether operators collect these data regularly. Results of checks on, between the others, mortality rate data are recorded in inspection reports from on-farm inspections**.** NVWA stated that currently the Commission and the EU Member States discuss the provisions of the Directive 2007/43/EC, including these of mortality rate. NVWA expressed intention to discuss the validity of delivery daily mortality rates to the slaughterhouses. NVWA decided withholding its actions until the outcome of the discussion is available. **Assessment: As the competent authority did not take corrective actions and the situation in place remains unchanged this recommendation is assessed as: "Action still required". This assessment may change if the competent authority will present evidence of corrective actions.** **In order to fully address this recommendation NVWA should demonstrate that daily mortality rates are delivered with the documentation accompanying the flock to the slaughterhouse**.	

Audit 2014-7078 of 16 September 2014 in order to evaluate the animal welfare controls in place at slaughter and during related operations		
Recommendation	Basis for assessment	Current Status
2014-7078-3 To set up a system so that fur farmers can notify the competent authorities in advance when animals are to be killed. Conclusions (and findings) upon which this recommendation is based: 59 and 63. Legal basis for this recommendation: Article 7(3) of Regulation (EC) No 1099/2009.	This recommendation is based on finding (No. 59) and associated conclusion from Section 5.3 (No. 63) of the audit report that no system is in place allowing fur farmers to pre-notify killing of fur animals; in consequence officials do not know the date, therefore cannot be present and confirm that operators respect the animal welfare conditions. In their response NVWA undertook to set up a notification system. During the 2016 GFA NVWA stated that beginning from January 2016 it put in place electronic system for pre-notification of fur animals killing. Breeders can use mobile application and by sending a text message with e-code notify the event. In 2015 NVWA engaged the association of the fur animals producers in the communication process and, in such a way, ensured that all breeders become aware of the new notification system. NVWA presented evidence of communication on the new pre-notification system for fur breeders**.**	Closed due to action taken

2.B.11 Plant health

Audit 2012-6315 of 08 October 2012 in order to evaluate the plant health controls in the potato sector		
Recommendation	Basis for assessment	Current Status

Audit 2012-6315 of 08 October 2012 in order to evaluate the plant health controls in the potato sector		
Recommendation	Basis for assessment	Current Status
2012-6315-1 To ensure that when official PCN resistance testing is delegated to a private body, no conflict of interest exists between the exercise of the tasks delegated to it and its other activities as required by Article 2.1(g) of Directive 2000/29/EC.	This recommendation is based on conclusion in Section 5.1 and related finding in Section 5.1.7 of the audit report that private breeders received authorisation to carry out official tests of their own potato varieties to assess the level of potato cyst nematodes (PCN) resistance. This bears a risk of conflict of interest as the private breeders do the exercise over their own activities. In its response the National Plant Protection Organisation (NPPO) undertook to transfer the task of resistance testing from two private laboratories (owned by seed potato companies) to an independent laboratory. This will however require some investments on facilities and know-how transferred. NPPO has set a deadline on November 1, 2013 for the laboratories to present a detailed plan for the transition. NPPO stressed that it had never had doubt on the quality and reliability of the resistance testing by both laboratories. During the 2016 GFA NVWA stated that laboratories belonging to potato breeders / producers stop examinations by the end of 2015 and are no longer in charge of this activity. NVWA keeps authorisation of laboratory - HLB (http://www.hlbbv.nl/en/), that has no link to the potato breeders or producers. In October 2015 NVWA authorised the Netherlands General Inspection Service for Agricultural Seeds and Seed Potatoes (NAK) as the second laboratory for examination on PCN resistance. NVWA presented copies of internal notes containing policy decisions on the laboratories and HLB and NAK pre-authorisation audit reports.	Closed due to action taken
2012-6315-2 To ensure that following a ring rot	This recommendation is based on conclusion in Section 5.2 and related finding in Section 5.2.2 of the audit report that farmers grow seed potatoes at locations where in the preceding year ring rot outbreaks had taken place, despite of whether the disinfection have been carried	Closed due to action taken

Audit 2012-6315 of 08 October 2012 in order to evaluate the plant health controls in the potato sector		
Recommendation	Basis for assessment	Current Status
outbreak, production of seed potatoes is not allowed in the place of production in the same or in the following year of the designated contamination, as required by point 4.1.(b) of Annex IV to Directive 93/85/EEC.	out or not. Therefore, the safety margin envisaged by the Directive 93/85/EEC is not respected. In its response NPPO undertook to introduce measures ensuring that in the year after the ring rot outbreak, the fields, machinery and other facilities of the infested place of production would only be used for ware potato production, even if disinfection took place. During the 2016 GFA NVWA stated that beginning from 2014 it intensified official measures once the ring rot outbreak is confirmed. In the growing season that follows confirmation of ring rot, growers are not allowed to grow seed potatoes at fields recognised as infested or suspected of being infested. This implies that in such fields growers can grow only ware potato. Also, following confirmation of the ring rot, growers must ensure that infested or suspected of being infested potato are a) destroyed or b) sold to final customers for consumption or c) processed under official supervision (by ware or potato processing industry) within a maximum period of two months. NVWA stated that it applied the intensified measures only once because since 2012 only one ring rot outbreak has been confirmed (2016). NVWA developed the information package for growers; the package is available at: https://www.nvwa.nl/txmpub/files/?p_file_id=2204353. NVWA provided copy of the letter endorsing the intensified measures following the ring rot outbreak and the description of the measures itself.	

Audit 2012-6315 of 08 October 2012 in order to evaluate the plant health controls in the potato sector		
Recommendation	Basis for assessment	Current Status
2012-6315-3 To ensure that the definition of a field for the purposes of Directive 2007/33/EC fully takes into account sound scientific and statistical principles and the cultivation of the field as required by Article 3 of the same Directive.	This recommendation is based on conclusion in Section 5.2.6.1 and related finding in the Section of the audit report that the competent authority, used approach that is is not based on a single definition of a field; this is not fully in line with the "sound scientific and statistical principles" referred to in Article 3 of Directive 2007/33/EC. In its response NPPO stressed that its definition of a "field" for PCN purposes does not undermine the one from the directive. The essence of more detailed definition was to develop a sampling model, to sample always in small units and then defining the fields to be declared as "free" or – in some cases – "free and/or infested". Moreover, the foci model is based on very intensive sampling of real-life PCN infestations in field situations in the Netherlands. In consequence, the effect of common factors for introducing and spreading of PCN factors is included in the foci-model. This approach is scientifically and statistical substantiated and well documented in scientific articles. Nonetheless, NPPO stated that it will start research to improve the model. The approach for defining infested fields will be adjusted to the outcomes of the improved model. During the 2016 GFA NVWA stated that it uses the field definition and demarcation rules derived from the foci model described in scientific article by Been and Schomaker (2010). NVWA provided editorial references and copy of the article: *"The demarcation of Globodera rostochiensis and Globodera pallida infestations in fields for seed potatoes, using a Monte Carlo approach".* NVWA identified one more situation in which more specific approach could apply: the detection of more than one finding of PCN on a field that is sampled (for one finding a demarcation rule was already in place in 2010). Between two – after demarcation -	Closed due to action taken

Audit 2012-6315 of 08 October 2012 in order to evaluate the plant health controls in the potato sector		
Recommendation	Basis for assessment	Current Status
	contaminated surfaces (sampling strips) a safety zone is determined, if the distance between both surfaces is less than 27 metres. The safety zone is part of the contaminated field and the same measures are applied for the entire contaminated field. This approach is consistent with the scientific material described in the following documents available on internet: - Information package for growers with a PCN infestation, page 5. https://www.nvwa.nl/txmpub/files/?p_file_id=2000707 - Document with explanation of demarcation rules 'Uitleg van de regels ….', Situation 7. https://www.nvwa.nl/txmpub/files/?p_file_id=2208410 Since the Directive 2007/33/EU took effect in July 2010, this had the following major effects for growers: a) The use of a sampling density increased to 1,500 ml/ha instead of the previous standard 600 ml/ha (at present approximately one third of the total sampled area in the Netherlands is carried out at 1,500 ml/ha). b) In case of a non-compliant result, both the field strip (usually 11 metres width) and adjacent 16 metres on either side is demarcated, instead of 6 metres on either side, prior to 2010. In consequence it doubles the demarcated area of a finding (at maximum for isolated contaminated field strips). According to the Monte Carlo model, 16 metres on both sides raise the confidence level to 95%. NVWA launched extensive information campaign prior to implementing the new sampling and demarcation rules. This resulted in annually demarcated area increase from 2.8% in the period 2009/10 to 3.6% in the period 2011/12. NVWA presented a table with statistic in this	

Audit 2012-6315 of 08 October 2012 in order to evaluate the plant health controls in the potato sector		
Recommendation	Basis for assessment	Current Status
	respect. Based on contacts with growers associations, NVWA expressed an opinion that relatively low increase of infested area is a consequence of enhanced awareness amongst growers for more careful selection of fields to be sampled and tested for PCN. NVWA presented links and copies to scientific articles on monitoring and sampling on PCN, presentation demonstrating tool used and result of its application.	
2012-6315-4 To ensure that the control measures authorised for reducing the waiting time for re-testing of PCN scheduled plots are appropriate as required by point C, Section III of Annex III to Directive 2007/33/EC.	This recommendation is based on conclusion in Section 5.2.6.3 and related finding in the Section of the audit report that official measures for the de-scheduling of PCN contaminated fields have been approved as required in section III(C) of Annex III. It appears that the risk factors affecting the success of trap crops are taken into consideration when planning these measures and during the evaluation of their results. However, the reliability of PCN trap crops has not been established due to lack of assessment for what extent trap crops are affected by unfavourable weather conditions. In its response NPPO stated that extensive research showed that potato grown as trap crop (full field sown, harvested after 40 days, use of certified seed) can be very effective in reducing PCN populations. Only well-developed crops of *Solanum sisymbriifolium* are accepted by NPPO as a control measure. The growers are well aware of the success factors of trap crops. These factors are taken into account in the inspection programme on trap crops. Nevertheless, NPPO will evaluate the trap crops 2013 and decide if and under which conditions they may be continued in 2014.	Closed due to action taken

Audit 2012-6315 of 08 October 2012 in order to evaluate the plant health controls in the potato sector		
Recommendation	Basis for assessment	Current Status
	During the 2016 GFA NVWA stated that as regards the use of *S. sisymbriifolium* as trap crops NVWA stated that the criteria for *S. sisymbriifolium* were already very strict in 2012 and NVWA applies them still. NVWA presented the criteria in the document: *"Aardappelmoeheid – bestrijdingsmaatregelen aardappelmoeheid" (page 10 and 11),* available at: https://www.nvwa.nl/txmpub/files/?p_file_id=2001798. Nonetheless, NVWA developed criteria for potatoes used as a trap crop. Since 2015, growers can use only resistant potato varieties for growing trap crop with minimum resistance level: 7, reducing the risk that cysts will develop during bad weather when the destruction of the trap crop is delayed because growers cannot use spraying devices. The Wageningen UR Institute carried out scientific research on the use and monitoring of *S. sisymbriifolium* as a trap crop, and presented results in reports: 3250129300 and 5233343 available at: http://www.aaltjesschema.nl/Portals/0/Documenten/Maatregelen/RAPPORT_Raketblad_Aca.pdf and at: https://www.wageningenur.nl/nl/Publicatie-details.htm?publicationId=publication-way-333732363334. NVWA published the rules for using potato as a trap crop in the document: *''Aardappelmoeheid – bestrijdingsmaatregelen aardappelmoeheid"* (page 6, point b) available at: https://www.nvwa.nl/txmpub/files/?p_file_id=2001798. NVWA presented statistic concerning the measures for control of PCN covering 2008 - 2016 and concluded that the use of resistant potato variety is the dominating successful method applied by farmers.	

Audit 2012-6315 of 08 October 2012 in order to evaluate the plant health controls in the potato sector		
Recommendation	Basis for assessment	Current Status
2012-6315-5 To ensure that establishments where PCN contaminated potatoes are delivered for processing and grading will have appropriate and officially approved waste disposal procedures as required by Article 10.1.(b) of Directive 2007/33/EC.	This recommendation is based on conclusion in Section 5.2.7.7 and related finding in the Section of the audit report that establishments handling PCN contaminated potatoes have not in place officially approved waste disposal procedures preventing spreading of PCN. In particular crisps and chips factories and most of potato sorting and packing companies dump waste soil on the agricultural fields. This creates potential risk of spreading PCN, in particular, in the absence of PCN official controls on the production of ware potatoes. In its response NPPO remind that until the end of 2010 environmental legislation did not allow applying waste soil from potato industry on fields used for agriculture. These measures have been lifted. NPPO stated that in 2013 it will implement measures to control the waste soil from potato processing industry and measures to control PCN on fields where waste soil is discharged. NPPO also expressed an opinion that, in practice, a lot of soil is brought to landfills outside the agricultural production sector. During the 2016 GFA NVWA stated that it implemented and published a set of measures to control the risks of PCN spread by waste soil from fields declared as PCN infested. The measures are relevant for five types of companies and are available at: https://www.nvwa.nl/onderwerpen/planten-plantaardige-producten/dossier/aardappelmoeheid/tarragrond-en-afzet-aardappelen. In brief the rules are the following: a) Potato growers that have a field declared infested for PCN, are obliged to deliver potatoes from the field to one of the 47 processors listed by the NVWA. Every year NVWA selects at random 50 growers and carry out inspections to verify compliance with this provision.	Closed due to action taken

Audit 2012-6315 of 08 October 2012 in order to evaluate the plant health controls in the potato sector		
Recommendation	Basis for assessment	Current Status
	Inspections are foremost targeted at ware potato growers. This procedure is in effect since 19 March 2015. NVWA presented copy of the procedure. Farmers who are willing to accept waste soil to elevate their fields are obliged to inform NPPO. The fields are declared infested before the soil from the potato processing companies is deposited on these fields. b) Potato trading companies; if potatoes originating from an infested field are sold to a potato trader, the trader signs up to a special contract agreement with the Potato Trade Branch Organisation (NAO – Nederlandse Aardappel Organisatie) to ensure processing of the potatoes by a listed company. This arrangement facilitates checks by inspectors to verify compliance. The arrangement is published by NAO at: http://www.nao.nl/nl/erkenningen/regeling-tarragrond-handelaren c) Potato processing companies (including packaging and storage companies); Since 6 March 2014 growers producing potatoes on PCN infested fields are obliged to process potatoes only with officially registered and contracted operators. Those operators must have in place provisions allowing for safe disposal of waste and adhering soil. NVWA presented copies of audit procedure, procedure for registration of processing companies and procedure for registration potato trading companies. NVWA registers potato processing companies and checks if they can prove that adhering soil is used outside agriculture or at fields registered by NPPO and declared as PCN infested. NVWA audits each registered company every two years. The list of registered processors is available on the NVWA website: https://www.nvwa.nl/txmpub/files/?p_file_id=2207047 NVWA presented copy of specific instruction on controls of waste disposal and registration of	

Audit 2012-6315 of 08 October 2012 in order to evaluate the plant health controls in the potato sector		
Recommendation	Basis for assessment	Current Status
	contaminated fields; instruction is also available at: https://www.nvwa.nl/onderwerpen/planten-plantaardige-producten/dossier/aardappelmoeheid/tarragrond-en-afzet-aardappelen/grondgebruiker-die-tarragrond-op-een-landbouwperceel-aanwendt. NVWA verifies the location where the soil has been deposited, cross-checks between the quantity delivered and quantity received, checks other deliveries and origin of the soil on the field. NVWA has in place instruction covering the above-mentioned issues.	

2.B.12 Quality Labelling

Audit 2014-7105 of 03 November 2014 in order to evaluate the control system for organic production and labelling of organic products		
Recommendation	Basis for assessment	Current Status
2014-7105-1 Ensure that the risk assessment carried out to determine the nature and frequency of controls takes into account the quantity of products and the risk of exchange of the products in line with Article 27(3) of	This recommendation is based on the conclusion and finding from Section 4.2.3 of the audit report that while planning official controls the competent authority does not take into account all criteria required by Article 27(3) of Regulation (EC) No 834/2007 and Article 65 (4) of Regulation (EC) No 889/2008; the following ones in particular: the risk of occurrence of irregularities, volume of production, the complexity of operations, conventional neighbours or new operator in the system. In its response NVWA stated that beside regular planned controls holdings SKAL may carry	Closed due to action taken

Audit 2014-7105 of 03 November 2014 in order to evaluate the control system for organic production and labelling of organic products		
Recommendation	Basis for assessment	Current Status
Regulation (EC) No 834/2007.	out additionally re-inspections (171 in 2014) and targeted inspections (605 in 2014). An enforcement protocol schedules these inspections and sampling (if needed) focusing on a particular risk area. An ongoing enforcement protocol is about to launch, focusing on holdings subject to a high number of product specifications; additional inspections will particularly focus on verifying compliance with the product specifications. In its updated response (June 2016) NVWA stated that, since January 2016, the Single Control Authority (SKAL Bio-controle) set up a risk classification system based on the following criteria: a) the operator's non-compliance history, b) the operator's turnover, c) whether or not operators' activities involve only organic products and/or non-organic products, d) the type of process (production, trade, storage), and e) the number of product specifications. During the 2016 GFA, SKAL confirmed that official controls are carried out following the risk-based approach. SKAL uses an assessment tool that selects operators for controls on the basis of risk criteria that are reflected by points system. Accumulated number of points identifies operators in various risk groups. SKAL gives priority to the top 100 operators. SKAL presented the assessment tool and the results of the assessment used for planning controls in 2016, and copies of inspection reports of operators selected for controls.	
2014-7105-2 Ensure that inspections are carried out in a primarily unannounced manner, in line with Article 65(4) of Regulation (EC) No 889/2008.	This recommendation is based on the conclusion and finding from Section 4.2.3 of the audit report that although regular inspections are without announcement, additional inspections are, in most cases pre-announced. In its response NVWA stated that in principle, directed inspections are unannounced. In situations where the presence of a quality-assurance manager is required, a holding is given	Closed due to action taken

Audit 2014-7105 of 03 November 2014 in order to evaluate the control system for organic production and labelling of organic products		
Recommendation	Basis for assessment	Current Status
	advance notice of no more than 24 hours. This is to ensure the presence of the quality-assurance manager and to avoid long distances travels "for nothing" because the responsible person is absent and in consequence the inspection cannot be carried out. Therefore, the advance notice is intended solely to determine and ensure that person is present. Nonetheless, the advance contact provides no details regarding the nature of the inspection. Since January 2016 the Single Control Authority introduced a rule of visiting at least 10% of operators unannounced. During the 2016 GFA SKAL stated that it plans controls on various aspects related to organic production. In addition to those, beginning from 2016, SKAL adds primarily unannounced, random controls, that are based on general evaluation of the risk of non-compliance and other risk factors. Unannounced controls account for at least 10 % of the total number of controls. SKAL stressed that the number of not-effective - "nobody home" controls is increasing. To ensure that at least 10% target is achieved SKAL plans higher number of unannounced controls. In 2016 SKAL planned in total 5,686 inspections of which 600 as unannounced. For comparison, in 2015, SKAL carried out 4,914 controls of which 550 were carried out as unannounced. SKAL presented copy of the 2016 control plan, an example of monthly evaluation of planned controls, example of the "nobody home" inspection report, inspection trend analysis and the copy of the correspondence concerning unannounced inspections.	
2014-7105-3 Ensure that inspections are effective	This recommendation is based on the conclusion and finding from Section 4.2.3 of the audit report that the Single Control Authority does not carry out regular checks on the balance between input and output. It carries out regular (routine) mass-balance checks only during re-	Closed due to action taken

Audit 2014-7105 of 03 November 2014 in order to evaluate the control system for organic production and labelling of organic products		
Recommendation	Basis for assessment	Current Status
and, in particular, that inspectors adequately check the stock and financial records referred to in Article 66(1) of Regulation (EC) No 889/2008 and the results of the verification at reception of organic products and the balance between inputs and outputs, as established in Article 66(2) of Regulation (EC) No 889/2008.	certification inspections that take place every three years. In its response NVWA stated that, registered holdings have been asked to carry out mass-balance checks once every three years during an extensive re-certification inspection. However, from January 2016, a mass-balance check will be required and connected with each annual inspection. During the 2016 GFA SKAL stated that since the beginning of 2016 the mass-balance check became the central part of inspection of organic products operators. To familiarise its staff and operators with the issue SKAL: - produced and published a video that is available at: http://www.skal.nl/over-ons/nieuws/ons-toezicht-in-2016, - included the topic in its newsletter available at: http://www.skal.nl/over-ons/nieuws/ons-toezicht-in-2016, - published the concept of mass-balance checks at its webpage: www.skal.nl SKAL presented examples of inspection reports containing records on mass-balance checks.	
2014-7105-4 Ensure that, where an operator runs several production units in the same area, the units for non-organic products, together with storage	This recommendation is based on the conclusion and finding from Section 4.2.5 of the audit report that while carrying out inspections on operators running, in parallel, organic and non-organic (conventional) activities, the Single Control Authority does not control the non-organic ones.	Closed due to action taken

Audit 2014-7105 of 03 November 2014 in order to evaluate the control system for organic production and labelling of organic products		
Recommendation	Basis for assessment	Current Status
premises for input products are also subject to the minimum control requirements in line with Article 66(3) of Regulation (EC) No 889/2008.	In its response NVWA explained that SKAL inspectors usually, in the entire holding, check whether organic and non-organic operations are being kept separate or not. This practice does not apply if a holding has two units (organic and non-organic) which are separated and, in particular, have status of two different legal entities. In such a case inspector has no legal power to enter the non-organic unit. Nonetheless, inspector carries out checks in the organic unit, also to verify the separation of activities between the two. If an operator stores its organic and non-organic products with separate legal entities, inspectors have no access to the non-organic products. Therefore for operators producing both organic and non-organic products, a full inspection visit must be conducted. SKAL ensures this through communication with appropriate inspectors in charge of controls on non-organic products. During the 2016 GFA SKAL stated that 2/3 of inspection reports contain records on checks carried out on organic and non-organic products whenever these are in the same production / storing unit or a holding belonging to the visited operator. SKAL underlined that it has legal rights and duties to carry out controls at sites belonging to organic operators, also if they run in parallel activity with conventional products, but has no legal power to visit operators handling exclusively non-organic (conventional) products. For this reason, in case of suspicion of cross-flow organic and non-organic products, SKAL contacts another competent authority and ask its assistance in investigation. SKAL presented: a) examples of inspection reports containing records of checks on operators running in parallel activities related to organic and non-organic products, b) two examples when SKAL asked assistance of another competent authority due to suspicion of fraud related to organic status of a product, c) training material for SKAL inspectors requiring check on the operator's sit to established if other activities related to non-organic products are in place, and	

Audit 2014-7105 of 03 November 2014 in order to evaluate the control system for organic production and labelling of organic products		
Recommendation	Basis for assessment	Current Status
	d) statistics concerning organic, non-organic and combined activities by different types of operators.	
2014-7105-5 Ensure that SKAL selects the operators to be sampled based on the general evaluation of the risk of non-compliance with organic production rules, in particular taking into account the quantity of products concerned and the risk for exchange of products, in line with Article 65(2) of Regulation (EC) No 889/2008.	This recommendation is based on the conclusion and finding from Section 4.2.6 of the audit report that although the way of sampling, by the Single Control Authority, complies with the relevant legislation, selection of operators for sampling does not reflect all relevant risk factors. In its response NVWA explained that until January 2016, while deciding what operators select for sampling, SKAL used the following factors: a) high-risk crops, b) key weather conditions, c) shortage of supply on the market, d) reports by third parties, and e) instances of non-compliance. Since January 2016 additional samples are collected from holdings classified as of "high-risk". Classification criteria include: a) history of non-compliance, b) type of production (organic and non-organic or organic only), c) implementation and voluntary participation in an organic quality-assurance systems (BIOKAP, BQA). Finally, SKAL selects operators for sampling using the following criteria: a) high-risk crops, b) regional weather conditions affecting the crop growth, c) the product availability of the market, d) reports from third parties, e) the history of non-compliance, and f) the number of product specifications. During the 2016 GFA SKAL stated that it takes into account the quantity of products concerned and the risk of exchange of products (including imported ones) when selecting	Closed due to action taken

Audit 2014-7105 of 03 November 2014 in order to evaluate the control system for organic production and labelling of organic products		
Recommendation	Basis for assessment	Current Status
	operators for sampling. SKAL presented copies of the sampling guidelines referring to production and import of organic products, and copy of the correspondence instruction on collection of samples.	
2014-7105-6 Ensure that laboratory samples of fresh produce to detect pesticides are kept cool during transport in line with point 4.6 of Directive (EC) No 2002/63.	This recommendation is based on the conclusion and finding from Section 4.2.6 of the audit report that samples of perishable products taken for pesticide analysis were transported in ambient conditions. This affects the products, and in consequence the reliability of analytical results. In its response NVWA stated that is in a process of assessment what would be the most efficient and effective way to ensure that samples of fresh, perishable products destined for pesticide analyses are not affected during transport. NVWA expected to find solution and implement it beginning from January 2016. During the 2016 GFA SKAL stated that it contracted a company specialised in delivery and transportation of agriculture products in controlled conditions. All samples of easily perishable products (including those taken for pesticide analysis) are to be transported in controlled chilled conditions. SKAL presented copy of the correspondence with the contracted company, instructions for inspectors on how to sample and how to arrange the transport for samples.	Closed due to action taken

Audit 2014-7105 of 03 November 2014 in order to evaluate the control system for organic production and labelling of organic products		
Recommendation	Basis for assessment	Current Status
2014-7105-7 Ensure that the Customs staff has up dated information at their disposal to check all criteria described in Article 13(3) of Regulation 1235/2008, in particular that the certificate of inspection was issued by an eligible control authority or control body.	This recommendation is based on the conclusion and finding from Section 4.2.8 of the audit report that the Customs service does not have at its disposal all the means necessary to check all criteria described in Article 13 (3) of Regulation (EC) No 1235/2008. Import authorisations have been granted without a full equivalence assessment. In its response NVWA explained that the Customs staff can consult Regulation 1235/2008 on the Customs Intranet (digital books, included in the Safety, Health, the Economy and the Environment legislation). However, since the lack of consolidated version made consultation on amendments related to Article 13(3) of the Regulation difficult, NVWA uploaded into the Customs Intranet, all recent amendments in the form of an Excel file. The file reflects the situation as of June 2015, thus includes changes resulting from Regulation (EC) No. 2015/931. NVWA and the Customs agreed that RVO.nl, following any amendments in legislation, promptly updates the file while the Customs will upload it to Intranet. In consequence, the Custom staff do not need wait until the consolidated version is available, thus could act on the basis of the most recent amendment published in the Official Journal. The Custom informed all staff on how to get access to and to use the file. Amendment of the work Manual to reflect new work protocol is in the pipeline. During the 2016 GFA NVWA stated that the Customs staff had received the Excel file containing all amendments to Regulation of the instruction (EC) No 1235/2008 and instruction on the use. NVWA presented the instruction and the file containing information allowing for verification if the certificate of inspection has been issued by control authority / control body and the country concerned is listed.	Closed due to action taken

Audit 2014-7105 of 03 November 2014 in order to evaluate the control system for organic production and labelling of organic products		
Recommendation	Basis for assessment	Current Status
2014-7105-8 Ensure that, in all cases when unauthorised substances are found in organic products that measures are taken in line with Article 91(2) of Regulation (EC) 889/2008 in order to ensure that only compliant products are placed on the market.	This recommendation is based on the conclusion and finding from Section 4.2.8 of the audit report that the Single Control Authority does not take measures if non-authorised pesticides, in concentrations below the maximum residue level (MRL), are detected in organic products. In its response NVWA underlined that Regulation (EC) No. 889/2008 does not mention the maximum residue levels. A the time of the audit in place was policy for the use of unauthorised pesticides devised by the Certification Institute for Alternative Agricultural Products, and consistent with policy of the European Organic Certifiers Council. According to the SKAL policy, if a residue level was below certain quantity (an action limit) there were no reasonable suspicion of intentional use, thus no measures were taken. The action limit is fixed at 0.01 mg/kg and is the same as the threshold applying to infant formulae (Directive 91/321/EEC of 14 May 1991). In June 2016 NVWA clarified that SKAL has modified its residue policy. After modification, consignments which exceed the generally applicable MRL are immediately reported to NVWA, and NVWA applies embargo. Where applicable, SKAL also enters them in the OFIS database and begins investigation. If residues are below the MRL but there is reasonable doubt as to the organic status of a product, the product is placed under embargo in accordance with Article 91(1) and (2) of Regulation (EC) No 889/2008 and SKAL starts an investigation. Where an operator has reasonable doubt as to whether a product has been produced in compliance with organic production rules, it immediately informs SKAL, in accordance with	Closed due to action taken

Audit 2014-7105 of 03 November 2014 in order to evaluate the control system for organic production and labelling of organic products		
Recommendation	Basis for assessment	Current Status
	Article 91(1) of the Regulation. *Assessment: The Dutch policy is not in line with the Regulation. Presence of any level of non-authorised pesticides (Article 12(1)(h) of Regulation (EC) No. 834/2007 allows to use authorised pesticides only) should be subject to an investigation as required by Article 91(2) of Regulation (EC) No. 889/2008.* During the 2016 GFA SKAL stated that, in 2015, it changed its previous policy. After the change SKAL investigates all residues of unauthorized substances regardless whether they above or below the MRL. In additional clarification (February 2017) SKAL stated that In every instance where a prohibited substance is detected, an analysis is undertaken using a risk-based approach. This analysis investigates whether prohibited substances occur more often in the same product and the frequency of the same company being involved in determining the presence of prohibited substances in its products. The size of the estimated risk determines the intensity of the investigation. In addition, SKAL removed from its website the reference to the level of 0.020 mg/kg as a residue limit triggering investigation. SKAL provided: a) screen-shots showing that the residue policy was removed from the SKAL website, b) examples of information reports demonstrating that SKAL had initiated investigations, and c) examples of notifications for which SKAL triggered investigations and undertook administrative decisions.	

Audit 2014-7109 of 11 November 2014 in order to evaluate the control systems related to Protected Designation of Origin (PDO), Protected Geographical Indications (PGI) and Traditional Specialities Guaranteed (TSG) for agricultural products and foodstuffs		
Recommendation	Basis for assessment	Current Status
2014-7109-1 Ensure that activities concerning official controls on PDO/PGI/TSG are specifically included in a separate section within the multi-annual national control plans, as established by Articles 40(1) of Regulation (EU) No 1151/2012. Conclusions upon which this recommendation is based and associated findings: No 6 and No 10.	This recommendation is based on conclusion (No.10) and associated finding (No. 6) of the audit report that activities for the control of PDO/PGI/TSG are not included in a separate section within the MANCP. In their response NVWA undertook to ensure that official controls organised in 2015 would cover PDO / PGI / TSG products of animal and non-animal origin, and a further up-date of MANCP will contain a separate section for protected names. During 2016 GFA the Ministry of Economic Affairs confirmed that in 2015 controls were carried out on operators producing PDO / PGI / TSG products of animal and non-animal origin. The Ministry stated that the 2015 MANCP Annual Report contains also a separate section: 4.21 for PDO/PGI/TSG products with statistics and a description of controls carried out in 2015. NVWA provided copy of the 2015 MANCP Annual Report.	Closed due to action taken
2014-7109-2 Ensure that the relevant Competent Authorities carry out verification of compliance with the product specification before placing the product on the market in respect of PDO/PGI/TSG, as established in Article 37(1) of Regulation (EU) No	This recommendation is based on conclusion (No. 16) and associated finding (No. 11) of the audit report stating that prioritisation of official controls does not include the verification of compliance prior to placing on the market of new registered products. Moreover, there are neither controls in place for products of non-animal origin nor controls on the market. In their response the Federal Ministry of Economic Affairs stated that: - Whenever new applications with new entrants are concerned the Ministry advises the owner	In Progress Post GFA

Audit 2014-7109 of 11 November 2014 in order to evaluate the control systems related to Protected Designation of Origin (PDO), Protected Geographical Indications (PGI) and Traditional Specialities Guaranteed (TSG) for agricultural products and foodstuffs		
Recommendation	Basis for assessment	Current Status
1151/2012. Conclusions upon which this recommendation is based and associated findings: No 11 and No 16.	of the product dossier to inform the competent authority. - Whenever new operators are concerned in relation to an existing PDO, PGI or TSG, the competent authorities to verify these new operators are the following: NVWA, the Quality Control Bureau - KCB and COKZ. The Ministry together with the competent authorities will review in 2015 how the authorities completed the action. During 2016 GFA the COKZ provided documentation (national rules for each product name) stipulating that verification should be carried out on product specification before placing them on the market. The Ministry of Economic Affairs could not demonstrate that other authorities verify new product specifications before placing on the market. In addition, the issue of financing KCB has not yet been adequately addressed (see recommendation 2014-7109-3). Moreover, discussions concerning registering of new product names (i.e. cheeses, coffee drink) with several producers are on-going. **Assessment: In order to fully address this recommendation the competent authorities should demonstrate that verification of the compliance with product specification takes place before placing product on the market.**	
2014-7109-3 Ensure that all registered names are subject to official controls covering	This recommendation is based on conclusion (N. 16) and associated finding (No. 14) of the audit report that for the products already subject to controls, no verification visits are carried out at farm level, thus it cannot be ensured that products placed on the market comply with the	In Progress Post GFA

Audit 2014-7109 of 11 November 2014 in order to evaluate the control systems related to Protected Designation of Origin (PDO), Protected Geographical Indications (PGI) and Traditional Specialities Guaranteed (TSG) for agricultural products and foodstuffs		
Recommendation	Basis for assessment	Current Status
the verification that a product complies with the corresponding Product Specification, as established by Article 36(3)(a) of Regulation (EU) No 1151/2012. Conclusions upon which this recommendation is based and associated findings: No 14 and No 16.	corresponding Product Specification. In their response the competent authority undertook to ensure that beginning from 2015 all registered names of products of non-animal origin are subject to official controls covering the verification that a product complies with the corresponding Product Specification in the annual project plans of the three competent authorities. During 2016 GFA the Ministry of Economic Affairs stated that problem has not yet been resolved regarding controls carried out by KCB on producers of non-animal origin (including small producers). The main reason being that funding for KCB controls has not been adequately regulated in the national legislation and legally KCB cannot be funded by the fees received from the operators. Ministry is working on this legal issue and expects to resolve it in July 2017. **Assessment: In order to fully address this recommendation the competent authority should demonstrate that they carry out verification if the products placed on the market comply with the corresponding product specification.**	
2014-7109-4 Ensure that documented procedures in place include verification of the following EU requirements: Requirements in the Product Specification to be complied with at	This recommendation is based on conclusions (No. 16 and 21) and associated findings (No. 13 and 19) of the audit report that: - There are no specific official controls for PDO/PGI/TSG undertaken at farms except when processing also takes place at that site. In consequence some of the conditions that can be confirmed at farm level (including geographical origin) are not verified.	In Progress Post GFA

Audit 2014-7109 of 11 November 2014 in order to evaluate the control systems related to Protected Designation of Origin (PDO), Protected Geographical Indications (PGI) and Traditional Specialities Guaranteed (TSG) for agricultural products and foodstuffs		
Recommendation	Basis for assessment	Current Status
farm level; Requirements as regard the origin of feed as established in Article 1 of Regulation (EU) No 664/2014; Requirements related to identification and correlation between inputs and outputs, as referred to in Article 4 of Regulation (EU) No 668/2014 Conclusions upon which this recommendation is based and associated findings: No 13, No 16, No 19 and No 21.	- Check-lists followed by officials during official controls do not include input and output correlation checks and all requirements of the Product Specification, therefore officials do not control them. In their response the competent authority undertook to: a) To incorporate the requirements for PDO/PGI/TSG in inspection procedure for official control of PDO/PGI/TSG. b) To ensure that all requirements of the product dossiers are incorporated in the inspection lists on official control of PDO/PGI/TSG. This also applies for checklists for products of non-animal origin. c) To include the origin of feed in part of the review of new PDO-products of animal origin. For product dossiers (established before Regulation (EC) No. 664/2014) the requirement of the origin of the feed as stipulated in this regulation is not applicable (unless explicitly mentioned in de product dossier). d) To include checks on a mass balance of outgoing PDO/PGI/TSG products of animal and non-animal origin in relation to incoming products / raw materials. These checks will be developed in 2015 and implemented in 2016. During 2016 GFA the COKZ confirmed that since 2016 controls on mass balance had been implemented and are carried out on annual basis. COKZ control procedure was changed in this regard (chapters 2.9 - 2.10). Also it was confirmed that COKZ started controls in dairy farms and now verifies if these meet approved product specifications. COKZ provided copies	

Audit 2014-7109 of 11 November 2014 in order to evaluate the control systems related to Protected Designation of Origin (PDO), Protected Geographical Indications (PGI) and Traditional Specialities Guaranteed (TSG) for agricultural products and foodstuffs		
Recommendation	Basis for assessment	Current Status
	of respective documentation (for Gouda cheese and Edam Holland). COKZ stated that, for product dossiers that had been approved before Regulation (EC) No 664/2014 came into force, it does not check the requirements for sourcing feed; in particular, if the feed origins from relevant geographical area (at least 50% of dry matter). **Assessment: In order to address this recommendation COKZ should demonstrate that it checks the requirements for PDO/PGI/TSG products dossiers approved before Regulation (EC) No 664/2014 came into force. In particular, if the feed is originating from relevant geographical area (at least 50% of dry matter).**	
2014-7109-5 Ensure that official controls cover the monitoring of the use of registered names to describe product placed on the market, as established in Article 36(3)(b) of Regulation (EU) No 1151/2012. Conclusions upon which this recommendation is based and associated findings: No 5, No 15 and No 16.	This recommendation is based on conclusion (No. 16) and associated findings (No. 5 and 15) of the audit report that there are no market controls on PDO/PGI/TSG covering the monitoring of the use of registered names. In their response NVWA stated that official controls in the retail chain are included in the annual plan 2015 of the competent authority. In addition where it concerns the assessment of complaints in the retail chain action is taken by the competent authority. During 2016 GFA the Ministry of Economic Affairs confirmed that official controls cover the monitoring of the use of registered names to describe product placed on the market. The official controls on the market are now carried out by the NVWA. The Ministry stated that, 1,515 market controls carried out in 2015 covered 55 products with	Closed due to action taken

Audit 2014-7109 of 11 November 2014 in order to evaluate the control systems related to Protected Designation of Origin (PDO), Protected Geographical Indications (PGI) and Traditional Specialities Guaranteed (TSG) for agricultural products and foodstuffs		
Recommendation	Basis for assessment	Current Status
	registered names.	

3. OVERVIEW OF MORE RECENT AUDITS

In addition to the recommendations which are dealt with in chapters 2.B.1 to 2.B.12, the reports of a further three audits carried out by DG Health and Food Safety in the Netherlands have now been published. The follow up of the recommendations in these reports will be published in future country profile updates.

The overall conclusions of the audits are set out below.

Audit 2015-7371 of 26 May to evaluate the operation of official controls over the post-slaughter traceability of meat, meat products and preparations, composite products
Within the scope of the audit, the official controls plans are implemented as foreseen and official controls are carried out in accordance with documented procedures. Official controls over identification and traceability are in place, but the checklists used are not sufficiently detailed in relation to traceability controls and some of the controls are insufficiently rigorous. Controls on labelling and composition of products are not a priority. The official controls do not include checks and sampling to verify the correct use of additives and flavourings. Official controls are focussed on the "one step backwards, one step forwards" principle (i.e. from where raw materials are sourced and to where product is delivered). Traceability within establishments, (in particular concerning quantities received, in stock and dispatched) is not checked and establishments are not required to have internal traceability systems in place. While the routine competent authority's controls found some non-compliances regarding traceability, labelling and use of additives, they did not detect a number of more serious, systemic deficiencies. Neither the food business operators nor the competent authorities are acquainted with a more rigorous evaluation of the documentation, in particular, in regard to the reconciliation of quantities of meat and ingredients along the production chain. The competent authority was able to carry out tracing of all 12 of the samples of meat and meat products, selected at retail level during this audit, back to the slaughterhouse of origin or the point of entry into the Netherlands. However, when traceability within establishments was analysed by the audit team, this was found to be unsatisfactory for 8 of the 12 samples with deficiencies in the documentation and discrepancies between the quantities of ingredients along the production chain. Notwithstanding the above, examples of good practices were seen in relation to this audit concerning the set-up and coordination for the tracing, the development of a template to create an overview of the product tracing for all ingredients used at different levels, the flow of goods and the establishments involved and the check-list to verify the labelling.

Audit 2015-7483 of 17 November 2015 to evaluate controls on the marketing and use of plant protection products
There is a risk based system of controls covering all categories of operators involved in marketing and use of plant protection products, with generally good co-operation between relevant competent authorities. There is an effective system of controls on pesticide imports, covering products destined for all the EU Member States, which provides reasonable assurance that illegal pesticides do no enter the EU via the Netherlands, a key member state in transport and logistics in Europe. There is an insufficient frequency and scope of controls at manufactures and re-packers. These limitations, combined with a failure to sufficiently utilise the extensive formulation analysis capacity, constrains the potential for the detection of illegal plant protection products on the market. While detailed procedures are in place for controls on wholesalers and users, and the scope and frequency of inspections is sufficient, these procedures are not routinely followed by inspectors, thus weakening the system of controls on these operators. The prohibition of aerial spraying, the systems established for sprayer testing, operator training and disposal of empty packaging/remnants, and controls at user level on integrated pest management provides assurances on the safe use of plant protection products

2015-7417 of 07 September 2015 to determine the effectiveness on animal welfare of activities promoting competence of animal handlers and keepers
Training in the pig sector is in a transitional state in the Netherlands. There is suitable innovative vocational training for students and ad-hoc training for farmers though there is no evaluation of whether they provide instructions and guidance to their staff on welfare requirements. The recent competent authority's initiative on group housing showed varying levels of competence in the sector and a need for further assistance and training. The competent authority prioritised training on welfare at slaughter in 2011 and put in place an effective system to ensure that all slaughterhouse staff were trained quickly and in large numbers by the end of 2014. A post-training review by the competent authority identified that due to inadequate content of training material used initially, trainees may have missed important elements of the requirements of 1099 during their training but course content has subsequently been rectified and is now suitable for purpose.

ANNEX I – ACRONYMS, ABBREVIATIONS, SPECIAL TERMS

ACRONYM	DESCRIPTION
ABIC	Approved body, institute or centre
ABP	Animal By-Products
AHS	African horse sickness
AI	Avian influenza
ASF	African swine fever
AWO	Animal welfare officer
BIP	Border inspection post
BT	Bluetongue
C&V	Consumer and Safety Division (NVWA)
CCP	Critical control point
CEFAS	Centre for Environment, Fisheries and Aquaculture Science
COKZ	The Netherlands Controlling Authority for Milk and Milk Products
CP	Contingency plan
CVED	Common veterinary entry document
CVO	Chief Veterinary Officer
DFPB	The Dutch Fish Product Board
Directorate F	Directorate F – Health and Food Audits and Analysis – of DG Health and Food Safety (before 1 February 2016 – the Food and Veterinary Office)
EFSA	European Food Safety Authority
EHD	Epizootic Haemorrhagic Disease
EU	European Union
FBO	Food business operator
FMD	Foot and mouth disease
GD	Animal Health Service
HACCP	Hazard Analysis and Critical Control Points
ILT	Environment and Transport Inspectorate
KCB	Quality Control Bureau
LBM	Live bivalve molluscs
MANCP	Multi-Annual National Control Plan
MRL	Maximum residue level
MSM	Mechanically separated meat
NAK	The Dutch General Inspection Service for Agricultural Seed and Seed Potatoes
NAO	Potato Trade Branch Organisation
NCAE	The Dutch Supervisory Authority Eggs
NPPO	National Plant Protection Organisation
NPR	National Plan for Residues of Veterinary Drugs
NVS	The Dutch Zoo Association
NVWA	The Netherlands Food and Consumer Product Safety Authority
OA	Official auxiliary
OF/SI	Organic fertilizers and soil improvers
OM	Operation manual
OV	Official veterinarian
PAH	Polycyclic aromatic hydrocarbons
PAH	Polycyclic aromatic hydrocarbon,

ACRONYM	DESCRIPTION
PAP	Processed animal proteins
PCN	Potato cyst nematode
PGI	Protected Geographical Indication
PGO	Protected Designation of Origin
RASFF	Rapid Alert System for Food and Feed
RIKILT	Research Institute
RIVM	The National Institute of Public Health and the Environment
RVO	The Netherlands Enterprise Agency
SKAL	SKAL Biocontrole - the Single Control Authority
SNCP	Salmonella National Control Programme
TRACES	Trade Control and Expert System
TSEs	Transmissible Spongiform Encephalopathies
TSG	Traditional Specialities Guaranteed
TTX	Tetrodotoxin
V&I	Veterinary and Import Division (NVWA)
VMP	Veterinary Medicinal Products
WI	Work instruction