



Annex I.b : Programme for the eradication of bovine Tuberculosis, bovine Brucellosis or sheep and goat Brucellosis (*B. melitensis*) submitted for obtaining EU cofinancing

Member States seeking a financial contribution from the European Union for national programmes of eradication, control and surveillance shall submit online this application completely filled out.

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- 7) For simplification purposes you are invited to submit **multi-annual programmes**.
- 8) As mentioned during the Plenary Task Force of 28/2/2014, you are invited to submit your programmes in **English**.

Submission Date

Friday, October 09, 2015 17:06:38

Submission Number

1444403202454-6883



Standard requirements for the submission of programme for eradication, control and monitoring

1. Identification of the programme

Member state: ITALIA

Disease Bovine brucellosis

Species: Bovines

This program is multi annual: no

Request of Union co-financing
from beginning of:

2016

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1.1 Contact

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2. Historical data on the epidemiological evolution of the disease

Provide a concise description of the following indicators :

- Number of serologically positive domestic pigs compared to previous year
- Number of virologically positive domestic pigs compared to previous year
- Number of serologically positive wild boar/feral pigs compared to previous year
- Number of virologically positive wild boar/feral pigs compared to previous year
- An assessment of the evolution of the indicators along the years is requested as well as obstacles and constraints identified that hamper the progress of eradication.

(max. 32000 chars) :

Analysis of the data received from the regions (Annex 1/2 (2013) and 3/4 (2014)) regarding the eradication activities carried out between 2013 and 2014 has revealed the situation described below. The national bovine population subject to the program in the year 2014 is decreased with regard to the number of holdings especially in view of the fact that other Italian regions with the Decision 2014/91 / EU have been granted the status of official free (Liguria); on a national level if we consider the total number of holdings (108160) present respect with the number of outbreaks registered (511) the percentage of prevalence that results is 0.47%.

In the regions not yet officially free, the national plans plus those specific regional have had partial efficacy, and is not yet been achieved the eradication of the disease; compared to 2013 (99,46%) the percentage of controls on holdings is slightly decreased (99,32% -2014) while is increased the percentage of infection recorded (1,57% 2014 vs 1,55% 2013). There was a slight decrease in the percentage of holdings tested throughout the national territory compared to 2013 (-0.14 %).

A large area (Annex 1 - Table 3) of the country has been confirmed as officially disease-free or close to achieving that status, including the region of Liguria, which was recognised as disease-free by the EU Decision of 14 February 2014.

The region with the highest prevalence appears to be the Puglia (2.38%) that exceeded Sicily, (which with 2.07% marked an improvement over the previous year).

Given the effectiveness of the ministerial order 9 August 2012 laying down special measures for

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brucellosis of the bovines and buffalos in the Regions Calabria, Campania, Apulia and Sicily, which provided for further control measures for the diseases listed above, expired in August 2014, the Ministry of Health started the process of drafting and approval of a new Ministerial Order. It contains measures that affect all territories still not officially free and that originate from: the experience of the implementation during these years; and from the recommendations arising during the FVO audit on brucellosis held in Italy in October 2013. The new Ordinance includes actions for the Regional Veterinary Services and for the Local Veterinary Services (ASL), to evaluate the effectiveness of control of brucellosis, both at farm level that at the slaughterhouse. They were confirmed all the measures concerning the use of information systems in the territories not officially free as also in those officially free underlined the importance of developing for the confirmation and notification of the outbreak an epidemiological investigation accompanied by laboratory analysis, microbiological analysis for the attempt of isolation of brucella and all information regarding the traceability of the animals movimentation..

3. Description of the submitted programme

Provide a concise description of the programme with its main objective(s) (monitoring, control, eradication, qualification of herds and/or regions, reducing prevalence and incidence), the main measures (sampling and testing regimes, eradication measures to be applied, qualification of herds and animals, vaccination schemes), the target animal population, the area(s) of implementation and the definition of a positive case.

(max. 32000 chars) :

The programme is annual and covers the following objectives:

- to continue with, and step up, animal health measures and measures to prevent brucellosis in cattle and buffaloes;
- to intensify disease eradication on infected holdings so that they can be designated officially disease-free or, for holdings where vaccination is practised, disease-free;
- to retain officially disease-free status (or disease-free status where vaccination is practised) for holdings that have already achieved that objective;
- to review the national legislation, with the issue of a new decree providing for the reorganisation of the health measures to be applied in officially disease-free and not officially disease-free regions, on the basis of the provisions of Directive 64/432/EEC.

The planned and achievable objective for 2016 is for other Italian provinces and regions to meet (or retain) the requirements to qualify for officially disease-free status (or disease-free status where vaccination is practised) as regards brucellosis in cattle and buffaloes.

It should be pointed out that vaccination with the *Brucella abortus* strain RB51 vaccine is not planned at the moment. This option could be considered in some provinces of Apulia (Gargano Mount), Calabria (part of Cosenza) and Sicily (Nebrodi Mountains), where it could be an extreme solution to implement due to the characteristics of the conditions of free range animal rearing. If vaccination should be carried out in these areas, the provisions of Commission Decision 2002/598/EC approving vaccines against bovine brucellosis within the framework of Council Directive 64/432/EEC, and the guidelines issued on this matter (document SANCO/10245/2003) will be complied with.

The special vaccination plan approved by the European Commission to combat brucellosis in buffaloes in the province of Caserta is currently suspended and replaced with a special monitoring plan to assess the unlawful use of RB51 vaccination in adult animals.

4. Measures of the submitted programme

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4.1 Summary of measures under the programme

Duration of the programme: 2016

First year :

- Control
- Testing
- Slaughter and animals tested positive
- Killing of animals tested positive
- Vaccination
- Treatment
- Disposal of products
- Eradication, control or monitoring

4.1.1 Timeline for the eradication

Provide the timeline foreseen for the eradication with detailed justification (max. 32000 chars) :

As communicated to us by the regions with a territory not officially free, listed below are the dates in which regions are expected to reach:

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- 1) the status O.F.;
 - 2) the terms of prevalence minimum required, under current legislation, to thin out the checks, and after six years forward the request to the territory O.F.
- Abruzzo: 2018/20 ;
Basilicata: 2016;
Calabria: 2018;
Campania: 2020;
Lazio: 2015;
Molise: 2016;
Puglia; 2018/2030;
Sicilia: 2020.

4.1.2 Interim targets in relation to the timeline for eradication

based on herd prevalence and herd incidence at different periods in link with the timeline for eradication (max. 32000 chars) :

The timeline for the eradication in Italy (the boot) is strongly influenced from few territories in some regions. For example, in Campania the Buffalo breeding in Province of Caserta (5.15 % of prevalence 2014) and the Gargano in Puglia (7.97% % of prevalence 2014) Calabria Province of Crotona (4,64% of prevalence 2014) and Cosenza (2,70% of prevalence 2014).

Discourse apart is necessary for Sicily which has more Province at high prevalence and which are connected by a large movement of animals. In this region and in this way in animal husbandry, the forecast of 2020 there appears to be optimistic.

So, in continental Italy, if we will be able to speed up the process of eradication in these "hot spot" of Puglia, Calabria and Campania, and if we consider a exaggeration the date of 2030 for the eradication on the Gargano area, where with the next visit of the commission of the next July, will be asked a detailed explanation, it is possible consider that this could happen by 2020/22; while for Sicily, also if this year it has been registered in teh Region a decrease of prevalence, considered the situation of the Province of Messina that has reported a prevalence of 5,69% in 2014, the date of 2020 must be considered with caution.

4.2 Organisation, supervision and role of all stakeholders involved in the programme

Describe the authorities in charge of supervising and coordinating the departments responsible for implementing the programme and the different operators involved. Describe the responsibilities of all involved.

(max. 32000 chars) :

1) Ministry of Health: this is the central body of the National Health Service. It is responsible for health policy and planning, setting targets for improving the health of the population, and determining the uniform levels of care to be provided to all citizens throughout the country. The Directorate-General for Animal Health and Veterinary Medicine has responsibility, among other things, for the Animal Health sector.

2) Regional Health Departments (Assessorati Regionali alla Sanità): these are the bodies responsible for health protection services and activities within their region. They are also responsible for planning the measures to be implemented by coordinating the activities of the ASLs and monitoring their work.

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3) Local Health Agencies (Aziende Sanitarie Locali – ASLs) are the units operating on the ground. They ensure the levels of assistance in their geographical areas by means of their own services. They are under the administrative and financial control of the regions but enjoy wide operational autonomy.

4) Animal Disease Prevention Institutes (Istituti Zooprofilattici Sperimentali – IZSs): these are public-law health bodies with operational and administrative autonomy and are the technical and operational arm of the national health service, particularly as regards animal health, monitoring the quality and fitness for consumption of foodstuffs of animal origin, farm hygiene and the proper relationship between human settlements, animals and the environment.

By means of ring trials involving the main laboratory and the provincial diagnostic centres, each IZS ensures that brucellosis is diagnosed in a uniform manner in its geographical area. The National Reference Centre for Brucellosis organises annual ring trials involving Italy's ten IZSs.

By means of the Ministerial Decree of 4 October 1999, Abruzzo and Molise IZS, which has its headquarters in Teramo, was designated the National Reference Centre for Brucellosis.

Further information on the Ministry of Health and, in particular, on the Directorate-General for Animal Health and Veterinary Medicine is available at <http://www.salute.gov.it/>

4.3 Description and demarcation of the geographical and administrative areas in which the programme is to be implemented

Describe the name and denomination, the administrative boundaries, and the surface of the administrative and geographical areas in which the programme is to be applied. Illustrate with maps.

(max. 32000 chars) :

The programme will be applied to the whole of Italy, taking account of the epidemiological differences found in the various areas of the country. Regions and provinces that have obtained officially disease-free status (see Annex 5) will adopt specific regional surveillance and control programmes. Although these specific surveillance programmes are part of this national plan for the eradication of brucellosis in cattle and buffaloes for 2016, no EU cofinancing has been requested for them.

Because of the expiration, in August 2014, of the Ministerial Order of 9 August 2012 by means of that have been strengthened the measures adopted in Calabria, Campania, Apulia and Sicily to combat tuberculosis, brucellosis in cattle and buffaloes, ovine and caprine brucellosis and leukosis , the Ministry to renew it has signed a new Ministerial Order, at the moment at the exam of the Italian Court of Auditors that has include additional measures, coming from the experience of the application of the past Ministerial Orders and from the recommendations of the Food and Veterinary Office elaborate from of the last Audit held in October 2013.

Furthermore this new Ministerial Order will be extended to all areas not officially disease-free, and not only in Puglia, Calabria, Sicilia and Campania (ANNEX 6).

In summary, the new Ministerial Order will provide the following stricter measures for (see annex of draft of Ministerial Order):

- 1) responsibility of the procedure of eradication;
- 2) registration of pastures;
- 3) controls on dealers;
- 4) controls on fattening herds;
- 5) animal movementation;
- 6) electronic identifications (rumen bolus);
- 7) animal without control at pasture;
- 8) stamping-out;
- 9) epidemiological investigation and notification of outbreak in ADNS;

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10) payment of compensation within 90 days.

4.4 Description of the measures of the programme

A comprehensive description needs to be provided of all measures and detailed reference must be made to Union legislation. The national legislation in which the measures are laid down is mentioned.

4.4.1 Notification of the disease

(max. 32000 chars):

Notification is required not only by Ministerial Decree No 651/94 but also, even where infection is only suspected, by Article 2 of the Veterinary Regulation, Presidential Decree No 320 of 8 February 1954. A farm is deemed to be infected with brucellosis if the epidemiological investigation, that has considered clinical signs, official serological tests and bacteriological checks, reveal that one or more animals have contracted the infection. An animal is also deemed to be infected if the veterinary service suspects that it is infected and appropriate examinations confirm infection. For the purposes of the notification requirements, all abortions for which a cause other than brucellosis has not been established must be considered suspicious. When abortion occur, an epidemiological investigation involving collection of the data covered by the "Brucellosis Outbreak Data Collection Sheet" annexed to the 2003 programme is also required. This data sheet will be sent with the miscarriage sample to the IZS, which will carry out the relevant analyses and send all the data both to the locally responsible ASLs and to the Regional Veterinary Epidemiological Observatory for the area. The periods laid down for communication between the IZS and the ASL and between the ASL and the farmer, and thus for the relevant official notification, must be strictly observed and must be sufficient to permit all the action required between detection and closure of an outbreak to be carried out. The regional authorities, the IZSs and the ASLs must take all possible measures, including the use of electronic communication, to keep these periods to a minimum. In order to speed up the implementation of all measures to control outbreaks pending formal decisions by the ASL, a 'pre-notification' system is suggested, by means of which the official veterinarian immediately issues the necessary instructions to the farmer. Infringements of the requirement to make notifications, including in the event of suspicion only, are punished by administrative penalties.

4.4.2 Target animals and animal population

(max. 32000 chars):

The programme requires all cattle and buffaloes to be checked, as laid down by Ministerial Decree No 651/94 (national legislation). On holdings due to be inspected, all animals aged 12 months or older undergo serological testing (SAT and CFT). Checks on pooled milk are also carried out in some regions by means of ELISA tests, as provided for by Directive 64/432/EEC as amended.

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All breeding farms with at least one breeding animal must be inspected. With the new order the fattening farms are constituted from animals controlled 30 days before the introduction or 30 days after the introduction in the case where is possible to keep isolated these animals until the negative response of the tests. Furthermore the Regions can provide for a statistical based sampling of the animals at the slaughterhouse. The fattening farm can move animals directly or by dealers only to the slaughterhouse. The veterinary service, record the control activities, on the fattening farms, on the VetINFO, the Italian database for control's recording.

In regions that are officially disease-free or close to achieving that status, the number of serological tests is reduced, as specified in Directive 64/432/EEC as amended, Annex A, Chapter II.

4.4.3 Identification of animals and registration of holdings including detailed reference to relevant Union legislation and its implementation in the Member State for this disease

(max. 32000 chars):

ANIMALS

The current system for identifying and registering bovine animals (Presidential Decree No 317/96, Regulation (EC) No 1760/2000 and the Interministerial Decree of 31 January 2002, as amended, 'Provisions for the operation of the bovine register') allows the holding of origin to be identified and an animal's movements to be traced by means of its identifying documentation (passport) and individual identification code (ear tag).

The Ministry of Health, in conjunction with other administrative bodies, has drawn up a special operating manual laying down the procedures for implementing the Interministerial Decree of 31 January 2002 on "Provisions for the operation of the bovine register" (as amended). This document sets out the technical rules for the registration and identification of cattle and buffaloes.

Before commencing implementation of the programme on each holding, the official veterinarian will check that the information concerning the holding in the national database is correct, and, if there are any discrepancies (unregistered animals, etc.), will ensure that the national database is immediately updated. Infringements of the requirements laid down in the specific legislation concerning the system of identifying and registering bovine animals are punished in accordance with Legislative Decree No 58 of 29 January 2004.

In the new Order is provided, for all the national territory that the registration, of the new identified animals, in the national informatic system should be done from the owner or his delegate, within 7 days. In all territories still not O.F., and also in that Officially Free if they wants, the animals that are moving for pasture should be identified with rumen bolus. Compulsorily for a not O.F. territory and optionally for a O.F. province, all the animals from an infected herd, are identified within 2 days with rumen bolus by the veterinary service.

HOLDINGS

In accordance with Ministerial Decree No 651/94, all holdings covered by the plan must be registered. A list must then be compiled by the veterinary services of the ASL responsible for each area.

Moreover, with the entry into force of Presidential Decree No 317/96, all farmers are required to register their holdings with the locally responsible ASL, which issues them with an identification code.

Each farmer has a herd record form (copy of Form 2/33) on which the checks carried out are recorded. A copy of this form is also held in the archives of the veterinary services and kept up to date.

The regulations relating to the registration system for farms and holdings are set out in Presidential Decree No 317/96 (implementing Directive 92/102/EEC), Presidential Decree No 437/2000 (implementing Regulation (EC) No 820/97) and Regulation (EC) No 1760/2000.

This identification and registration system consists of the following elements:

Individual identification codes for animals;

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Identification papers (passports) for animals;

Registers kept at all holdings;

Computerised database (NDB).

The Ministry of Health has made available to local health authorities, regional authorities, trade associations and directly to the farmers concerned a computerised system for the transmission of data on cattle and buffaloes to the central database. The Interministerial Decree of 31 January 2002, as amended, lays down that slaughterhouse managers must electronically notify all data regarding slaughtered animals to the national and regional databases simultaneously.

4.4.4 Qualifications of animals and herds including detailed reference to relevant Union legislation and its implementation in the Member State for this disease

(max. 32000 chars) :

All holdings must achieve officially disease-free status or disease-free status (in provinces in which vaccination is planned, if vaccinated animals are present).

In order to be recognised as officially disease-free, all animals on the holding must have been free of clinical manifestations of brucellosis for at least six months, must not (with the exception of females vaccinated at least three years previously) be vaccinated against brucellosis and must not have come into contact with animals of a lower health status of species that are susceptible to brucellosis.

Moreover, all animals over twelve months old must have tested negative in two official serological tests carried out not less than four months and no more than eight months apart. To maintain this status, two similar tests must be carried out annually not less than three months and no more than six months apart.

The veterinary services enter into the national database of the bovine register not only information on the health status of farms (officially disease-free, disease-free, infected, last check negative, unknown, suspended) but also other health information deemed to be useful for the proper management of the programme, particularly as regards epidemiological surveillance).

Only animals from officially brucellosis-free farms may be introduced. If they are over twelve months old, they must have tested negative in an official serological test carried out in the 30 days prior to being introduced onto the farm.

Provinces are declared officially free of bovine brucellosis if all the farms in their territory are under official surveillance and 99.8 % of them have been officially disease-free for the last five years, in line with Legislative Decree No 196/99 transposing Directive 97/12/EC. A region is declared officially disease-free when all its provinces have achieved this status.

If, during the year, an officially disease-free holding does not undergo the checks laid down for retention of that status, it loses the status and is included among the holdings with unknown health status.

4.4.5 Rules of the movement of animals including detailed reference to relevant Union legislation and its implementation in the Member State for this disease

(max. 32000 chars) :

For animal movements, Form 4 must always be completed in quadruplicate, as laid down in Article 31 of the Veterinary Regulation. Form 4 contains the information needed to identify the holdings of origin and destination, the individual identification codes of the animals to be moved, their health status, and particulars of the transporter.

In the new Ministerial Order is provided for that all the animal's movimentation are authorized only from the electronic Form 4, available in the national database.

Apart from being sent for slaughter, animals may be moved only if they come from officially brucellosis-free and brucellosis-free holdings, accompanied by Form 4. In all cases where the animals are not being

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sent to the slaughterhouse, the official veterinarian will fill in section E (Health certification) on Form 4, indicating the date of the last inspection of the animals and the holding of origin, in addition to the health status of the holding of origin.

Penalties are applied in the event of irregularities.

At the fattening farms is allowed move their animals not only for the slaughterhouse, whether directly or indirectly, but also to other fattening farms.

The monitoring performed from the veterinaries local service (ASL) ensures that the channeling of the fattening Holdings is respected.

Given the animals' short productive life and the fact that they are moved only to the slaughterhouse at the end of the cycle, fattening farms can be considered to be epidemiological units distinct from breeding farms, subject to specific regional monitoring plans.

Pursuant to Ministerial Decree No 651/94 (Article 5(7)), only farms with officially brucellosis-free or brucellosis-free status may undertake seasonal movements of animals for grazing, mountain grazing or transhumance, with the identification of separate areas to accommodate cattle from officially brucellosis-free or brucellosis-free holdings respectively.

4.4.6 Tests used and sampling and testing schemes including detailed reference to relevant Union legislation and its implementation in the Member State for this disease (including herd frequency, animal coverage in each herd, interpretation of the test,...)

(max. 32000 chars):

The official tests used in Italy (the serum agglutination test (SAT) with Rose Bengal antigen and the complement fixation test (CFT)) comply with the provisions of Directive 64/432/EEC (transposed in Italy by Legislative Decree No 196/99).

The antigen used for the Rose Bengal test is the same throughout Italy and is produced by Abruzzo and Molise IZS. The antigen used for the complement fixation test is the same throughout Italy, and is produced by Lombardy and Emilia Romagna IZS. The quality of the antigens is systematically checked by the National Reference Centre for brucellosis in Teramo (Abruzzo and Molise IZS). Standardisation of the antigens is carried out in accordance with the relevant EU provisions. All official tests are performed at the IZSs responsible for each geographical area.

Farmers who do not cooperate with the programme are subject to enforced implementation, entirely at their own expense (Article 26 of Ministerial Decree No 651/94).

It is considered necessary to increase the number of bacteriological examinations to isolate *Brucella* spp. in animals culled at slaughterhouses after testing positive and in the products of miscarriages on holdings.

Regions or provinces that are officially disease-free within the meaning of EU law – and, in any case, all regions whose epidemiological situation is not a cause for concern, which inspect 100 % of the checkable herd and in which at least 99.8 % of the holdings have officially disease-free status – may be authorised to change the frequency with which tests are carried out.

Furthermore, upon request, and following an assessment of the epidemiological conditions and consultation with the National Reference Centre, this Ministry may authorise the use in these regions of tests on pooled milk (milk ELISA) and other official tests provided for by Legislative Decree No 196/99 (Directive 64/432/EEC). These tests may be used exclusively for the purposes of allowing holdings to retain officially disease-free status. Such changes must form part of specific monitoring and surveillance plans drawn up with the agreement of the Ministry of Health and the National Reference Centre. These plans may also lay down procedures for the retention and/or re-acquisition of officially disease-free status for holdings in accordance with the provisions of EU law as transposed by Legislative Decree No 196/99.

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In the new Ministerial Order the procedures for serological analysis in the territory not O.F. are provided in the annex 1 (Annex 7).

4.4.7 Vaccines used and vaccination schemes including detailed reference to relevant Union legislation and its implementation in the Member State for this disease

(max. 32000 chars) :

After that the Region of Campania in 2014 suspended vaccination of pre-pubescent buffalo in the Province of Caserta, with B. abortus RB51 vaccine, as provided as of 2007 by the vaccination plan approved by the European Commission in Decision 2001/561/EC of 2 August 2007, at the present in Italy is not planned the use of vaccination for brucellosis.

It should be pointed out that, if vaccination with the Brucella abortus strain RB51 will be re-considered as a possible instrument to speed up the process of eradication in some problematic areas where breeding system, pedo-climatic conditions and/or social and economical difficulties, hamper the progress of the process of eradication, this will be carried out in compliance with the provisions of Commission Decision 2002/598/EC approving vaccines against bovine brucellosis within the framework of Council Directive 64/432/EEC, and the guidelines issued on this matter (document SANCO/10245/2003).

4.4.8 Information and assessment on bio-security measures management and infrastructure in place in the holdings involved.

(max. 32000 chars) :

In the event of an outbreak of brucellosis, Ministerial Decree No 651/94 provides for the local veterinary service to implement and monitor the following health measures:

- 1) a thorough epidemiological investigation by the official veterinarian, in cooperation with the IZS if necessary, with the aim of identifying the origin of the infection and any potential contact with other holdings;
- 2) reporting the outbreak and the measures adopted to the public hygiene service of the local health unit responsible for the area;
- 3) a survey by species and category of all animals on the holding and individual identification by means of appropriate marking, where necessary, of all animals of susceptible species;
- 4) the isolation and removal of confirmed and suspected cases of infection from the rest of the herd;
- 5) the slaughter of infected animals within 30 days of notification of a positive result;
- 6) destruction of foetuses and foetal remains and also of stillborn calves or calves that die immediately after birth;
- 7) disinfection of premises and equipment;
- 8) the milking of healthy animals before milking of infected or suspect animals, followed by appropriate disinfection;
- 9) a ban on all movements from and around the infected farm, except in the case of authorisation to remove cattle and buffaloes destined for immediate slaughter;
- 10) immediate identification of calves of both sexes born to infected mothers by means of appropriate marking, and a ban on their use for breeding, and on their release from the holding except for slaughter;
- 11) milk from infected cattle and buffaloes taken before culling may be only be fed to other animals on the same holding, and only if it has been heat treated beforehand;
- 12) milk from healthy animals on infected farms may be removed in separate, clearly marked containers only if the milk is to be sent solely to dairies that are suitably equipped for it to be pasteurised prior to processing;
- 13) immediate destruction by burning or burial of hay, straw, litter and any material or substance that

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has come into contact with infected animals or the placenta, after spraying with a disinfectant;
14) manure from the pens or other buildings used to house the animals must be disposed of in a location that cannot be accessed by animals on the farm. The manure collected must undergo suitable disinfection or be kept for at least three weeks before being used and it may not be used on fruit and vegetable crops. Similarly, slurry from the pens or other buildings used to house the animals must undergo suitable treatment if it is not collected at the same time as the manure;
15) the dogs present on the holding must undergo serological testing and, if they test positive, be promptly quarantined and treated, if necessary in a kennel or other dog shelter, under the supervision of the Local Veterinary Service, for a period of not less than three months.

The following disinfection measures are also required.

1. Within seven days of the disposal of the infected cattle and buffaloes, and before the farm is restocked, the pens and other buildings used to house the animals, as well as the containers, equipment and tools used for the animals, must be cleaned and disinfected under official supervision. The veterinarian will issue the appropriate disinfection certificate. Pastures previously used by these animals cannot be reused for four months after they have been removed.
2. All means of transport, containers and equipment must be cleaned and disinfected under official supervision.

4.4.9 Measures in case of a positive result including detailed reference to relevant Union legislation and its implementation in the Member State for this disease

A description is provided of the measures as regards positive animals and detailed reference to the Union legislation provisions (slaughter, destination of carcasses, use or treatment of animal products, the destruction of all products which could transmit the disease or the treatment of such products to avoid any possible contamination, a procedure for the disinfection of infected holdings, the therapeutic or preventive treatment chosen, a procedure for the restocking with healthy animals of holdings which have been depopulated by slaughter and the creation of a surveillance zone around infected holding). A definition of a suspicion and of a confirmation should be provided, with detailed measures implemented in both situation and how the herd is requalified as free after a positive result.

(max. 32000 chars) :

On holdings that are found to be infected, animals testing positive must be isolated, marked and slaughtered as soon as possible and, in any case, within 30 days of notification of a positive result. In all the regions not O.F. that will be object to the new Ministerial Order, animals testing positive will be identified within two days of notification, of a positive result, by means of a rumen bolus. Animals testing positive must then be culled within 15 days of the official notification of a positive result. Ministerial Decree No 651/94 lays down that a thorough epidemiological investigation be carried out by the official veterinarian in cooperation with the IZS responsible for the geographical area and the Regional Veterinary Epidemiological Observatory. In the new Ministerial Order is provided for that the epidemiological investigation is registered in the national informatic system (SIMAN). In accordance with Article 5 of the Veterinary Regulation approved by means of Presidential Decree No 320/54, the onset of an outbreak must be notified to the public hygiene services of the ASL responsible for the area. Likewise, the public hygiene services of the ASL responsible for the area must inform the ASL's veterinary services of all cases of brucellosis in humans. Serological tests must be carried out in other holdings where an epidemiological correlation with the infected holding is found. If there are problems with slaughter or with the sale of carcasses that have been released for consumption, the regional authorities will follow all the permitted procedures to ensure compliance with the timescales laid down for the slaughter of infected animals. Milk from animals which are infected or suspected of being infected must be collected separately and used exclusively for animal feed, after being heat treated. In accordance with Presidential Decree No 54/97 (implementing Directive 92/46/EEC), the milk of healthy animals may be used only in the production of heat-treated milk and milk-based products.

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Manure must be removed from barns, disinfected and stored for at least five months before being used. Fixed and movable structures on holdings must be cleaned and disinfected using the proper mobile disinfection units. After disinfection, a certificate will be issued as proof that the operations have been carried out.

Restocking is permitted once the animals over twelve months old that have remained on the infected holding test negative in at least two official diagnostic tests, the first of which must be carried out at least 42 days after removal of the last infected animal and the second at least four weeks and no more than six weeks after the first.

Finally, Ministerial Decree No 429/97 introduced the possibility, in cases where the epidemiological situation is believed to be difficult to resolve, to cull and pay compensation for a farm's entire stock. Such action must be proposed by the relevant veterinary service and authorised by the regional authority following approval by the IZS responsible for the area and must be notified at the Ministry of Health. The new Ministerial Order has provided for in an annex, specific indications, to the region, for apply the stamping out (see annex 9). These indications should take in account the clinical signs (abortion), the prevalence of serological positivity, the isolation of brucella, the species (if bovina or ovi-cprine), the recrudescence of the positivity in the herd.

Specific plans of Regions Puglia and Sicily as response to the follow-up on brucellosis programme for bovine and ovi-caprine performed by the DGSANTE in July 2015.

To give a response to the recommendations formulated as consequent of the follow-up on brucellosis programmes implemented by Puglia and Sicily, the two Regions have elaborated two specific plans to solve the problems identified in the territories of Gargano (Puglia) and in the province of Messina (Sicily). The more stringent measures provided for by the regional plans and the new Order of the Ministry of Health 28th May 2015 will give to the local Veterinary Services the necessary instruments to progress faster in the process of eradication of the brucellosis.

The main measures in response to the outcomes of the DGSANTE visit are described below.

PUGLIA

In addition to the measures listed below, the Region considers necessary propose again the stringent measures already approved by the ORDINANZA DELLA GIUNTA REGIONALE of the 5 May 2014 n. 299 "Misure straordinarie di polizia veterinaria in materia di brucellosis bovina e bufalina in Provincia di Foggia" elaborated in collaboration with the NRC of Teramo and the IZS of Foggia, as response at the recommendations of the AUDIT FVO of the 10-11 October 2013.

1. The epidemiological investigation in positive/infected herds where considered poor:

the Region is going to participate at the workshop on the Epidemiological Investigation (EI) organized by the Minister of Health on 3rd of November 2015. The purpose of the workshop is to review the models included in the Information System SIMAN, specify the legal bases of the EI, underline their importance for the management of an outbreak and for the detection of the source of infection, emphasize the necessity of collaboration with the local Veterinarian Service and the regional epidemiological observatory aimed to pinpoint more efficient and effective eradication strategies and properly implement the activities provided for by the eradication programmes co-financed from EU.

2. The up-date of the national veterinary system was not always performed:

the Region will insure the complete and correct implementation of the information in Information Systems (SANAN, SIMAN and BDN) through follow-up actions carried out from the regional CA to the local CA and from the veterinary Directorate of the Animal Health area of the ASL of Foggia.

3. The biosecurity measures where considered poor:

the Region will guarantee the census for epidemiological purpose of all susceptible species present in the infected holdings. Furthermore, their physical separations will be guaranteed by apposite disposition

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of the Veterinary Service.

4. The free grazing may jeopardize the possibilities of eradication of the disease in the whole area: the Region provide for a specific regulation for the free grazing that will oblige the holdings at fence off the pastures and forbid the common watering.

SICILY

1. The chain of command in the ASP of Messina is unclear, and the human resource should be distributed in more efficient manner:

the assignment of Director of the Animal Health Unit of the ASP of Messina has been conferred after official procedure and the human resource has been reinforced with ten additional position for veterinarian.

2. The above situation together with the fact that the data SANAN and BDN are not always up-date: the new organization of the ASP will be useful also for a major and efficient use of the Information Systems.

3. The epidemiological investigation in positive/infected herds where considered poor: within the end of October, the ASP of Messina will provide to insert all the EI in SIMAN. Furthermore, the Region will participate at the workshop on the Epidemiological Investigation organized from the Minister of Health on 3rd of November 2015, in order to improve the quantity and quality of the EI in the system.

4. Identification of the animals as well the control of animals movements are still not properly performed: in the Nebrodi area, the ASP of Messina will initiate an activity of monitoring aimed to control animal movements and identification.

5. Sanctions in case of infringements are notified but is not verify the effective application: the General Director of the ASP has ensured to represent this criticality to the Office responsible for collecting payments.

Finally, the Region in response to the indications of the DGSANTE will ensure the necessary follow-up and control.

I would like also to underline that, given the spirit of cooperation established with the Regional Competent Authorities, my Office will regularly follow-up the proper implementation of the plans, we will keep you posted on progress.

4.4.10 Compensation scheme for owners of slaughtered and killed animals

(max. 32000 chars):

In accordance with Ministerial Decree No 429/97, to qualify for the slaughter compensation available, farmers must submit their claims to the ASL responsible for the area within 60 days of slaughter of the last infected animal (Article 2(2)). If compensation remains unpaid without justification 90 days after the date of submission of the claim, interest at the statutory rate is due (Article 2(4)).

The legislation providing for the granting of compensation to farmers specifies that, in the event of proven infringement of the regulations on the eradication of brucellosis, the compensation will not be paid (Ministerial Decree of 4 June 1968, Ministerial Decree No 429/97).

The value of the compensation is set, and updated annually, by the Ministry of Health, in agreement with the Ministry of Agricultural Policy, after market values have been determined (Article 6 of Law No 296/81).

To respond at the raccomandations of the brucellosis task force came in Italy in march 2013 and for discourage in Sicily suspected bad behaviour of the breeders, that tempted from the high prize of the

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compensation paid at the national level, could infect the old sheeps to take the premium and re-buy young animals, for the 2016 has been re-modulated the prize of compensation for ovi-caprine. This it has been setted on 3 categories of animal compensated: lamb, sheep in production and sheep out of production, with more of 6 years old. This last categorie has a reduction of the value at 35% respect at the value of the sheep in production.

Proceeds from the sale of slaughtered animals will be paid to the farmer by the dealer who purchased them.

Furthermore, Law No 218/88 provides for increases (up to a maximum of 40 % of the compensation due) if a high percentage of the stock has to be culled. There is also provision for an increase of 50 % per animal on cattle and buffalo holdings with ten animals or fewer. However this increase of the compensation determined by law No 615/1964 as amended by Law No 218/88 never exceeds the market value of animals killed.

4.4.11 Control on the implementation of the programme and reporting including detailed reference to relevant Union legislation and its implementation in the Member State for this disease

(max. 32000 chars):

The implementation of the eradication programme is monitored by checking the data submitted with the reports required by Decision 2008/940/EC. The regional veterinary service checks the data and activities reported by the ASLs' local veterinary services. The Ministry of Health's Veterinary Service in turn checks the data and activities reported by the veterinary services of the regions and autonomous provinces in collaborations with the reference center crossing the data submitted in the national informatic System: SANAN, SIMAN and BDN. This data that are related to the controls effected by the local veterinary service, the outbreaks and the objectives set and pursued, permit to elaborate a report for each region not O.F. where is evaluated the activities of the Region and indicated the measures to perform to achieve the objective of prevalence and incidence prefixed (ANNEX 8)

The new Ministerial Order lays down a requirement to enter data on the checks carried out for brucellosis into the SANAN system and data on the epidemiological investigations into the SIMAN system via the Internet.

The Ministry of Health conducts regular visits and audits at local level to check the activities implemented within the region.

The Ministry of Health also assesses health activities, including veterinary activities, by evaluating essential levels of care. If shortcomings in health activities are identified, the Ministry of Health partially reduces the funding available for health activities in the region.

5. Benefits of the programme

A description is provided of the benefits of the programme on the economical and animal and public health points of view.

Describe

- progress expected compared to the situation of the disease in the previous years, in line with the objectives and expected results
- cost efficiency of the programme including management costs

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(max. 32000 chars) :

The eradication programme, which is based on the implementation of Ministerial Decree No 651/94 and Legislative Decree No 196/99 (transposing Directive 64/432/EEC), makes provision for specific costs of the services of self-employed veterinarians, reimbursement of the IZSs that carry out the serological tests, the disinfection of premises on infected holdings and compensation to farmers for animals culled during the eradication operations.

The progress expected from the eradication program are more Provinces and Regions that aim to arrive at the minimum percentage to get the status of O.F.

In particular we expected for the 2016 more Region and Province that get the status of O.F.

For the year 2016 we expect that more Provinces of the peninsula will be ready to arrive at the minimum percentage to get the status of O.F. considering the percentage of prevalence and controls registered for the 2014, as reported in the following list.

Abruzzo:

Province of Teramo 100% of controls 0,00% of prevalence;

Basilicata:

Province of Venosa and Matera 100% of controls 0,00% of prevalence;

Calabria:

Province of Vibo Valentia 96,98% of controls 0,10% of prevalence;

Province of Reggio Calabria 99,13% of control 0,37% of prevalence;

Campania (Bovine):

Province of BENEVENTO 100,00 % of controls 0,20 % of prevalence;

Province of NAPOLI 100,00 % of controls , 0,00 % of prevalence;

Province of AVELLINO 100,00 % of controls 0,15 % prevalence;

Province of CASERTA 100,00 % of controls, 0,14 % prevalence;

Lazio (bovine and buffalo):

Province of Rome 100% of control 0,11% of prevalence;

Molise:

Province of ISERNIA 100,00 % of control 0,27 % of prevalence;

Puglia:

Province of TARANTO 100,00 % of control 0,00 % of prevalence;

Province of BARLETTA ANDRIA TRANI 100,00 % of control 0,00 % of prevalence;

Province of BARI 100,00 % of control 0,00 % of prevalence;

Under the legal and economic framework governing the National Health Service, all these expenses come out of the National Health Fund's appropriations.

The share of that fund due to the individual regions is credited to them from year to year as a lump sum; that is to say, the total amount is used to run the entire regional health service (the region in turn distributes the amount to the individual ASLs), of which the veterinary service constitutes only a very small part.

Any assessment of the programme's success is implicitly linked to achievement of the health standard laid down therein and the resulting benefits, particularly as brucellosis is a serious zoonosis which necessitates the exclusion of infected animals and their products (milk and dairy products) from the market.

As the percentage of accredited holdings increases, the commercial potential of the products will be enhanced, the movement of animals and animal products will be facilitated and there will be fewer cases of human infection.

Another benefit, and by no means the least important, will be the availability of higher quality, safer foodstuffs, which will eliminate the negative impact of this zoonosis on human health

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7. Targets

The blocks 7.1.1, 7.1.2.1, 7.1.2.2, 7.2, 7.3.1 and 7.3.2 are repeated multiple times in case of first year submission of multiple program.

7.1 Targets related to testing (one table for each year of implementation)

7.1.1 Targets on diagnostic tests for year: **2016**

Region	Type of the test	Target population	Type of sample	Objective	Number of planned tests
SICILIA	ELISA	Bovines	milk	qualification	10 X
ABRUZZO	COMPLEMENT FIXATION TEST	Bovines	serum	qualification	500 X
BASILICATA	COMPLEMENT FIXATION TEST	Bovines	serum	qualification	3 422 X
CALABRIA	COMPLEMENT FIXATION TEST	Bovines	serum	qualification	14 600 X
CAMPANIA	COMPLEMENT FIXATION TEST	Bovines and buffalo	serum	qualification	152 279 X
LAZIO	COMPLEMENT FIXATION TEST	Bovines	serum	qualification	3 095 X
MOLISE	COMPLEMENT FIXATION TEST	Bovines	serum	qualification	850 X

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PUGLIA	COMPLEMENT FIXATION TEST	Bovines	serum	qualification	26 230	X
SICILIA	COMPLEMENT FIXATION TEST	Bovines	serum	qualification	56 167	X
ABRUZZO	ROSE BENGALA TEST	Bovines	serum	qualification	70 124	X
BASILICATA	ROSE BENGALA TEST	Bovines	serum	qualification	134 868	X
CALABRIA	ROSE BENGALA TEST	Bovines	serum	qualification	172 034	X
CAMPANIA	ROSE BENGALA TEST	Bovines and buffalo	serum	qualification	815 765	X
LAZIO	ROSE BENGALA TEST	Bovines	serum	qualification	30 050	X
MOLISE	ROSE BENGALA TEST	Bovines	serum	qualification	21 600	X
PUGLIA	ROSE BENGALA TEST	Bovines	serum	qualification	265 555	X
SICILIA	ROSE BENGALA TEST	Bovines	serum	qualification	550 701	X
Total					2 317 850	
Add a new row						

7.1.2 Targets on testing herds and animals

7.1.2.1 Targets on testing herds

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7.1.2.1 Targets on the testing of herds for year : 2016

Region	Animal species	Total number of herds	Total number of herds under the programme	Number of herds expected to be checked	Number of expected positive herds	Number of expected new positive herds	Number of herds expected to be depopulated	% positive herds expected to be depopulated	Target indicators			
									Expected % herd coverage	% positive herds Expected period herd prevalence	% new positive herds Expected herd incidence	
ABRUZZO	Bovines	4 075	2 440	2 440	0	0	0	0	100	0	0	X
BASILICATA	Bovines	2 650	2 563	2 563	3	3	1	33,33	100	0,12	0,12	X
CALABRIA	Bovines	6 916	5 679	5 679	10	5	5	50	100	0,18	0,09	X
CAMPANIA	Bovines	10 745	7 495	7 495	37	16	3	8,11	100	0,49	0,21	X
CAMPANIA	Buffalo	1 297	1 282	1 282	13	8	5	38,46	100	1,01	0,62	X
LAZIO	Bovines	1 922	1 542	772	0	0	0	0	50,06	0	0	X
MOLISE	Bovines	856	540	540	0	0	0	0	100	0	0	X
PUGLIA	Bovines	3 912	3 653	3 653	57	25	12	21,05	100	1,56	0,68	X
SICILIA	Bovines	9 848	9 398	9 398	120	105	10	8,33	100	1,28	1,12	X
Total		42 221	34 592	33 822	240	162	36	15	97,77	0,71	0,48	
Add a new row												

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7.1.2.2 Targets on testing animals

7.1.2.2 Targets on the testing of animals for year :

Region	Species	Total number of animals	Number of animals under the programme	Number of animals expected to be tested	Number of animals to be individually tested	Number of expected positive animals	Slaughtering		Target indicators		
							Number of animals with positive result expected to be slaughtered or culled	Total number of animals expected to be slaughtered	Expected % coverage at animal level	% positive animals (Expected animal prevalence)	
ABRUZZO	Bovine	53 190	35 062	35 062	0	0	0	0	100	0	X
BASILICATA	Bovine	85 290	66 483	66 483	55	55	55	155	100	0,08	X
CALABRIA	Bovine	120 746	86 017	86 017	60	60	60	100	100	0,07	X
CAMPANIA	Bovine	186 559	125 925	125 925	168	168	168	231	100	0,13	X
CAMPANIA	Buffalo	289 410	260 375	260 375	2 120	2 120	2 120	2 740	100	0,81	X
LAZIO	Bovine	67 323	53 377	26 690	0	0	0	0	50	0	X
MOLISE	Bovine	17 037	10 800	10 800	0	0	0	0	100	0	X
PUGLIA	Bovine	172 962	129 644	129 644	506	506	506	656	100	0,39	X
SICILIA	Bovine	370 647	263 283	263 283	814	814	804	1 159	100	0,31	X
Total		1 363 164	1 030 966	1 004 279	3 723	3 713	5 041	97,41			
Add a new row											

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7.2 Targets on qualification of herds and animals

Targets on qualification of herds and animals

7.2 Targets on qualification of herds and animals for year: **2016**

Region	Animal species	Targets on the status of herds and animals under the programme																
		Total number of herds and animals under the programme		Expected not free or not free from disease				Expected free or officially free from disease status suspended				Expected free from disease				Expected officially free from disease		
		Herds	Animals	Last check positive		Last check negative		Expected free or officially free from disease status suspended		Expected free from disease		Expected free from disease		Herds	Animals			
ABRUZZO	Bovines	2 440	35 062	0	0	0	0	0	0	0	0	0	0	0	0	2 440	35 062	X
BASILICATA	Bovines	2 563	66 483	0	0	0	0	3	86	0	0	0	0	0	0	2 560	66 397	X
CALABRIA	Bovines	5 679	86 017	0	0	2	100	8	300	15	400	0	0	0	5 654	85 217	X	
CAMPANIA	Bovines	7 491	125 940	0	0	2	11	8	133	0	0	0	0	0	7 481	125 796	X	
CAMPANIA	Buffalo	1 281	256 921	0	0	18	5 423	29	6 787	13	4 572	66	25 267	1 155	214 872	X		
LAZIO	Bovines	1 542	53 376	0	0	0	0	0	0	0	0	0	0	1 542	53 376	X		

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7.3.2 Targets on vaccination or treatment of wildlife

7.3.2 Targets on vaccination or treatment of wildlife for year : **2016**

Targets on vaccination or treatment programme				
Region	Square km	Number of doses of vaccine or treatments expected to be administered in the campaign	Expected number of campaigns	Total number of doses of vaccine or treatment expected to be administered
NO REGION IS EXPECT TO VACCINATE	0	0	0	0
Total		0		0
Add a new row				
				X

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8. Detailed analysis of the cost of the programme

8.1 Costs of the planned activities for year: **2016**

The blocks are repeated multiple times in case of first year submission of multiple program.

To facilitate the handling of your cost data, you are kindly requested to:

1. Fill-in the text fields IN ENGLISH
2. Limit as much as possible the entries to the pre-loaded options where available.
3. If you need to further specify a pre-loaded option, please keep the pre-loaded text and add your clarification to it in the same box.

1. Testing	Cost related to	Specification	Unit	Number of units	Unitary cost in EUR	Total amount in EUR	Union funding requested
Cost of analysis	Complement fixation test	Individual animal sample/test	255 321	1.07	273 193,47	yes	X
Cost of analysis	Rose bengal test	Individual animal sample/test	2 060 697	0.66	1 360 060,02	yes	X
Cost of analysis	ELISA	Pooled sample test	10	1	10	yes	X
Cost of sampling	Domestic animals	Individual animal sample/test	2 060 697	1.97	4 059 573,09	yes	X
					Add a new row		
2. Vaccines	Cost related to	Specification	Unit	Number of units	Unitary cost in EUR	Total amount in EUR	Union funding requested
						Add a new row	

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3. Compensation paid to owners						
Cost related to	Specification	Unit	Number of units	Unitary cost in EUR	Total amount in EUR	Union funding requested
Bovines	Slaughtering/culling with salvage value	Animal	1 813	418.57	758,867.41	yes X
Buffalo	Slaughtering/culling with salvage value	Animal	2 740	452.18	1,238,973.2	yes X
Add a new row						
4. Cleaning and disinfection						
Cost related to	Specification	Unit	Number of units	Unitary cost in EUR	Total amount in EUR	Community funding requested
Cleaning and disinfection	Cost for each disinfection unit over the year	Disinfection unit	298	334.84	99782.32	no X
Add a new row						
5. Slaughtering/culling costs						
Cost related to	Specification	Unit	Number of units	Unitary cost in EUR	Total amount in EUR	Union funding requested
Add a new row						
6. Other costs						
Cost related to	Specification	Unit	Number of units	Unitary cost in EUR	Total amount in EUR	Union funding requested
salary	Cost of veterinarians employed for this programme only ⁺	veterinarian	296	16084.4	4,760,982.4	no X
Consumables and specific equipment	Costs of syringes, vacutainers, gloves and overalls	equipment used	851 007	0.61	519,114.27	no X
Administration	Paper, ink, computers and other equipment used for the ⁺	equipment used	121 146	1.21	146,586.66	no X
Add a new row						

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entire regional health service (the region in turn distributes the amount to the individual ASLs), of which the veterinary service constitutes only a very small part.

b) Implementing entities - **testing**: who performs the testing of the official samples? Who pays? (e.g. regional public laboratories perform the testing of official samples and costs related to this testing are entirely paid by the state budget)

(max. 32000 chars):

In Italy the testing are performed from the IZZSS (Istituti Zooprofilattici Sperimentali). Also these Institutes are financed from the Regions using their sanitary fund.

c) Implementing entities - **compensation**: who performs the compensation? Who pays? (e.g. compensation is paid by the central level of the state veterinary services, or compensation is paid by an insurance fund fed by compulsory farmers contribution)

(max. 32000 chars):

The compensation of the animals positive a the tests for brucellosis, are paid from the ASL or ASP. They use regionals fund that are resources allocated by the Treasury to the National Health Fund.

d) Implementing entities - **vaccination**: who provides the vaccine and who performs the vaccination? Who pays the vaccine? Who pays the vaccinator? (e.g. farmers buy their vaccine to the private vets, send the paid invoices to the local state veterinary services which reimburse the farmers of the full amount and the vaccinator is paid by the regional state veterinary services)

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(max. 32000 chars):

AT THE MOMENT IN ITALY IT HAS NOT BEEN PROVIDED FOR ANY PLAN OF VACCINATION.

e) Implementing entities - **other essential measures**: who implement this measure? Who provide the equipment/service? Who pays?

(max. 32000 chars):

For all the operations related to state prevention relating to brucellosis in cattle and buffaloes, ovine and caprine brucellosis and tuberculosis, the regions use the resources allocated by the Treasury to the National Health Fund.

2 Co-financing rate (see provisions of applicable Work Programme)

The maximum co-financing rate is in general fixed at 50%. However based on provisions of Article 5.2 and 5.3 of the Regulation (EU) No 652/2014, we request that the co-financing rate for the reimbursement of the eligible costs would be increased:

Up to 75% for the measures detailed below

Up to 100% for the measures detailed below

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3. Source of funding of eligible measures

All eligible measures for which cofinancing is requested and reimbursement will be claimed are financed by public funds.

yes

no

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Attachments

IMPORTANT :

- 1) The more files you attach, the longer it takes to upload them .
- 2) This attachment files should have one of the format listed here : **jpg, jpeg, tiff, tif, xls, xlsx, doc, docx, ppt, pptx, bmp, pna, pdf.**
- 3) The total file size of the attached files should not exceed 2.500Kb (+- 2.5 Mb). You will receive a message while attaching when you try to load too much.
- 4) IT CAN TAKE **SEVERAL MINUTES TO UPLOAD ALL THE ATTACHED FILES.** Don't interrupt the uploading by closing the pdf and wait until you have received a Submission Number!
- 5) Only use letters from a-z and numbers from 1-10 in the attachment names, otherwise the submission of the data will not work.

List of all attachments

Attachment name	File will be saved as (only a-z and 0-9 and -_)	File size
6883_4293.pdf	6883_4293.pdf	561 kb
6883_4294.doc	6883_4294.doc	93 kb
6883_4295.pdf	6883_4295.pdf	114 kb
6883_4296.pdf	6883_4296.pdf	70 kb
6883_4297.pdf	6883_4297.pdf	138 kb
6883_4298.pdf	6883_4298.pdf	10 kb
6883_4299.pdf	6883_4299.pdf	12 kb

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	6883_4300.pdf	6883_4300.pdf	10 kb
	6883_4301.pdf	6883_4301.pdf	15 kb
	Total size of attachments :		1023 kb