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Directorate F - Food and Veterinary Office

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FINAL REPORT OF AN AUDIT
CARRIED OUT IN
FRANCE
FROM 08 APRIL 2015 TO 17 APRIL 2015
IN ORDER TO
EVALUATE THE ANIMAL WELFARE CONTROLS IN PLACE AT SLAUGHTER AND
DURING RELATED OPERATIONS

In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.

Executive Summary

This report describes the outcome of a Food and Veterinary Office audit in France from 8 to 17 April 2015 to evaluate the effectiveness of official controls on business operators to ensure animals are spared any avoidable pain, distress, or suffering during their killing and related operations, taking into account the applicable requirements of Regulation (EC) No 1099/2009 and Regulation (EC) No 882/2004.

The report concludes that the situation in France is broadly satisfactory from a point of view of animal welfare at slaughter, with the exception of:

- ritually slaughtered poultry, for which there is no scientific evidence indicating that the electric parameters used will provide sufficient stunning;*
- poultry that undergo electrical waterbath stunning with parameters below those required by Regulation (EC) No 1099/2009, without enforcement measures being taken by the competent authorities.*

Other than the above, and the monitoring of stunning, slaughterhouse operations are generally in line with animal welfare requirements. Nevertheless, the slaughterhouses' own control systems as described by their standard operating procedures do not sufficiently or correctly describe those operations, nor include adequate records, to provide sufficient assurances to the competent authority of their level of compliance with the requirements of Regulation (EC) No 1099/2009.

The system of official controls in place is detecting the major operational non-compliances with Regulation (EC) No 1099/2009, and generally requesting corrective actions from operators. However it has not shifted yet to verifying the own checks systems of the business operators' controls and therefore also not started yet to detect and address the gaps in those systems.

Existing documentation indicates that animals unfit for transport (Regulation (EC) No 1/2005) are frequently transported to slaughterhouses, under the support of veterinary certificates, and no effective actions have been taken to correct this.

The system in place for monitoring at slaughterhouses for indications of poor welfare of broilers at farm triggered enforcement actions and resulted in corrective actions.

The report makes a number of recommendations to the French authorities to address the deficiencies noted.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
AWO	Animal welfare officer(s)
DGAL	Directorate General for Food (<i>Direction générale de l'alimentation, DGAL</i>)
EU	European Union
FVO	Food and Veterinary Office
mA	Milliampere
Hz	Herz
OV	Official veterinarian(s)
SOP	Standard operating procedure(s)

1 INTRODUCTION

This audit took place in France from 8 to 17 April 2015 as part of the planned audit programme of the Food and Veterinary Office (FVO). An opening meeting was held with the French competent authorities on 8 April 2015. At this meeting, the objectives of, and itinerary for, the audit were confirmed by the audit team and additional information required for the satisfactory completion of the audit was requested.

The audit team comprised two auditors from the FVO and a national expert from Greece and was accompanied throughout the audit by representatives from the Directorate General for Food (*Direction générale de l'alimentation*, DGAL) the central competent authority.

2 OBJECTIVES

The main objective of the audit was to evaluate the effectiveness of official controls on business operators to ensure animals are spared any avoidable pain, distress, or suffering during their killing and related operations, in particular:

- The assurances given by official controls regarding the business operators' compliance with applicable requirements of Regulation (EC) No 1099/2009 and the business operators' level of compliance;
- Whether official controls on animal welfare at the time of killing, carried out in accordance with Regulation (EC) No 882/2004, are suitable to ensure the effective implementation of Regulation (EC) No 1099/2009; and
- The Member State's and Competent Authorities' compliance with specific requirements of Regulation (EC) No 1099/2009, such as guides to good practice, scientific support and certificates of competence and the effectiveness of the implementation of those requirements.

In addition to the main objective, and as the official controls in slaughterhouses contribute to controls on animal welfare on farms and welfare during transport, the audit also evaluated whether:

- Indications of poor welfare conditions of chickens kept for the production of meat are being detected at slaughterhouse level and subsequently reported and acted on as required by Article 3 and Annex III of Directive 2007/43/EC; and
- Only animals which are fit for transport are sent to slaughterhouses, as required by Article 3 and Chapter I of Annex I to Regulation (EC) No 1/2005, and whether this is supported by the implementation of procedures in Regulation (EC) No 853/2004 Annex III Section I Chapter VI, which facilitates the killing of "emergency slaughter" animals on farm and their carcasses sent to the slaughterhouse.

Furthermore the audit sought to identify good practices recognised by the Competent Authorities in relation to Regulation (EC) No 1099/2009.

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

Meetings with Competent Authorities			Comments
Competent authority	Central	2	Opening and closing meetings
	Regional	2	Representatives from the Regional level of Brittany (<i>Bretagne</i>) and Burgundy (<i>Bourgogne</i>) were present at the meetings at District (<i>département</i>) level.
	District	5	Five districts visited in the two regions above indicated.
Site visits			
Slaughterhouses		7	11 slaughter operations were observed: cattle 4 (3 for adults, 1 for calves), pigs 2, chicken 2, sheep 2, turkeys 1.

3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation and, in particular Article 45 of Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

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

4 BACKGROUND

Regulation (EC) No 1099/2009 (hereafter "the Regulation") applies from 1 January 2013 in all EU Member States and repeals the previous EU legislation Council Directive 93/119/EC, which was applicable in all Member States from 1995. The Regulation lays down rules for the killing of animals bred or kept for the production of food, wool, skin, fur or other products as well as the killing of animals for the purpose of depopulation and for related operations.

The Regulation requires a stronger system of Business Operator supervision than was previously the case, in particular regarding the layout, construction and equipment of slaughterhouses, handling and restraining of animals and stunning and slaughter. An animal welfare officer is required to supervise operations and report directly to the Business Operator. The manufacturers and/or retailers of restraining and stunning equipment must provide operating and maintenance instructions with all equipment sold. Competent Authorities are required to ensure that appropriate courses leading to Certificates of Competence are available to relevant slaughterhouse staff and that guides to good practice are available to operators.

An FVO audit in France over the official controls on poultry meat production, which took place from 11 to 20 June 2013, (DG(SANCO)/2013-6688, available at

http://ec.europa.eu/food/fvo/audit_reports/index.cfm) noted also some deficiencies related to animal welfare. In response to a recommendation made following that audit the competent authorities undertook, amongst other things, to:

- remind representatives of the sector of the importance of complying with the provisions of the Regulation, in particular regarding waterbath stunning, at the meeting of the National Steering Committee on the implementation of the regulation, planned for the last quarter of 2013;
- request official services, by means of an instruction (draft Memorandum on the follow-up to the 2013 FVO mission in the poultry sector) to disseminate this awareness-raising message to the various approved establishments in their départements;
- with regard to the three establishments where deficiencies were found, an administrative formal notice stating they must comply with the electrical parameters in force would be served by the prefects concerned. The Districts would check the corrective measures implemented once the period laid down has elapsed;
- amend the harmonised inspection methods in order to better cover compliance with the provisions of Regulation No 1099/2009;
- send to the inspection services a new inspection checklist for the poultry and rabbit sector. Particularities regarding documents on animal protection (standardised procedures and operator's certificate of competence) would be included as items to be checked. The standardised procedure regarding the stunning of animals and checking its effectiveness to be specifically identified in order to meet the requirements of Article 6 of the Regulation;
- the manuals relating to the checklists would also be updated taking into account the new regulatory requirements;
- a training programme for inspectors in the poultry sector would start in 2014 and supplement the already existing arrangements in the butchery sector;
- lastly, national scheduling of inspections will be carried out so as to ensure that the requirements for animal protection are checked in all establishments.

5 FINDINGS AND CONCLUSIONS

5.1 FRAMEWORK FOR CONTROLS

5.1.1 Competent authorities involved

Legal requirements

Articles 4(1), 4(3) and Article 4(5) of Regulation (EC) No 882/2004.

Article 21 of Regulation (EC) No 1099/2009.

Findings

1. In line with the requirements of Article 4(1) of Regulation 882/2004 the DGAL is the designated competent authority responsible for official controls concerning the Regulation.

2. The organisation of the DGAL is described in the country profile, which is available at: http://ec.europa.eu/food/fvo/last5_en.cfm?co_id=FR
3. The competent authority for control of manufacturers of stunning and restraining equipment is the Directorate General for Competition, Consumers and Fraud. Nevertheless, the DGAL informed the audit team that with regard to the requirements of the Regulation the relevant competent authority was still the DGAL.
4. The Ministry of Agriculture, Food and Forest (*Ministère de l'Agriculture, de l'Agroalimentaire et de la Forêt*) has produced a draft French National Strategy for Animal Welfare 2015-2020 in co-operation with producers, researchers and animal protection organisation with five strategic areas of action: sharing knowledge, attribute responsibilities at all levels, promote practices that favour animal welfare, prevention of mistreatment of animals and taking action to address it, and information about the advances made and results from implementing the strategy.
5. The DGAL provided updated information and documentation to the audit team that demonstrated completion of the actions proposed in reply to the animal welfare related recommendation made in the FVO report DG(SANCO)/2013-6688 (see also section 5.7).

5.1.2 Scientific support and guides to good practice

Legal requirements

Articles 20 and 13 of Regulation (EC) No 1099/2009.

Findings

6. An animal welfare work group within the Agency for Food, Environmental and Occupational Health & Safety (*Agence Nationale de Sécurité Sanitaire de l'Alimentation, de l'Environnement et du Travail*) has been designated as the responsible for providing independent scientific support to the competent authority, as required by Article 20 of the Regulation.
7. Within the DGAL, a network of national reference officials for slaughterhouses provides advice concerning: approval of slaughterhouses and development of new stunning methods; inspections and audits; capacity and suitability of training bodies providing training on the protection of animals at the time of slaughter, as required respectively by Article 20 (a), (d) and (e) of the Regulation.
8. In addition, and particularly concerning the instructions provided by the manufacturers about the use and maintenance of restraining and stunning equipment, the DGAL will consult¹ a network of experts (in line with Article 20 (b) of the Regulation) on technology/animal welfare/production systems (*réseau mixte technologique / bien-être animal et systèmes d'élevage*) that is set up within industry associations (see also paragraphs 49, 50 and 51).

¹ In their response to the draft report the Competent Authority noted that this consultation is now ongoing

9. A national contact point has been designated and the relevant information is available on the internet (<http://agriculture.gouv.fr/sante-et-protection-des-animaux>) as required by Article 20 (2).
10. The Livestock Institute (*Institut de l'Élevage*) and the Agro-Industrial Institute for the Meat Sector (*Institut technique Agro-Industriel des Filières viandes*) drafted together a Guide to Good Practices for animal welfare of cattle in slaughterhouses. The guide was reviewed by industry representatives and submitted to the DGAL for validation.
11. That cattle guide was validated, after consultation with the scientific support and with relevant non-governmental organisations, and forwarded to the Commission as required by Article 13 of the Regulation. It is now in its version 3.0, subsequent to additional recommendations from the scientific support body in 2012 and 2013, and was widely used by cattle slaughterhouse operators as reference for their work instructions.
12. The draft National Strategy for Animal Welfare 2015-2020 encourages the production of good practices guides and these have been drafted already for the following species: poultry, sheep, lagomorphs, and pigs. Opinion from the scientific support body:
 - on the poultry guide is expected to be finalised February 2016, and on the lagomorphs guide in the summer of 2016;
 - was issued already for the guide for pigs and the guide for sheep, and the DGAL expects both of these to be finalised and published in 2015.
13. A guide to good practice for fur farmers will not be drafted in France and the DGAL encourages instead the industry to translate one such guide produced by another member state.

5.1.3 Provision of certificates of competence

Legal requirements

Articles 21 and 29 of Regulation (EC) No 1099/2009.

Findings

14. The DGAL has made available on the Internet relevant information on what are the requirements and how to apply for the certificate of competence for slaughterhouse workers required by the Regulation.
15. The DGAL has not yet ensured that training is available for killing of fur animals, and delivering the required certificates of competence, contrary to the required by article 21 of the Regulation. The DGAL explained that it plans to do so but that this training is more difficult to organise due to the very low number of fur farms existing in the country, that those few farms have been in activity for more than 3 years, and that, taking into account the provisions of article 29 of the Regulation (allowing for a simplified procedure to issue certificates of competence for persons demonstrating relevant professional experience of at least 3 years) such certificates could still be issued until 8 December 2015.
16. The Ministry of Agriculture has delegated the organisation of training courses to separate institutions, which is in line with Article 21(2) of the Regulation.

17. The DGAL recognises these institutions, after analysing the applications on their technical content and educational component, and the institutions' details are publically available via the Internet (in the *Arrêté du 19 septembre 2012 portant publication de la liste des dispensateurs de formation habilités à mettre en œuvre l'action de formation professionnelle continue sur la protection des animaux dans le cadre de leur mise à mort*) as also required by Article 21(2). This DGAL recognition is valid for five years after which the institutions will have to re-apply.
18. There are currently twenty such recognised institutions, sixteen provide training for line workers and animal welfare officers (AWO) and the other four provide training exclusively for line workers. Eight are recognised for bovine/equine slaughter, ten for ovine/caprine, eight for porcine, seven for poultry and three for lagomorphs.
19. The draft National Strategy for Animal Welfare 2015-2020 promotes the training of slaughterhouse personnel. Since April 2013 1097 persons have successfully attended AWO training courses for mammals and 435 for poultry, while 5197 have successfully attended line worker courses for mammals and 2934 for poultry.
 - Line worker courses are one day long and AWO courses are two days long (with one more half-day training per each additional species).
 - The practical aspects component of the courses is dealt with during the training through pictures/video projection of films made at slaughterhouses (sometimes from the slaughterhouse from which the trainees came) showing both mistakes and good practices, and through drawings with analysis of the situations.
 - There is a specific additional training module for slaughter without stunning.
 - The training institutions have overcome problems of sometimes low education level and/or low proficiency in French by providing visual and oral aid during training and at the exam, including interpreters if necessary.
20. The examination at the end of the training course is done, under supervision by the training institution, via the internet in a DGAL webpage and, after successful completion of the examination, the district issues the certificate of competence.
21. The certificates of competence indicated for which categories of animals, type of equipment and for which of the operations listed in Article 7(2) the certificate is valid, as required by Article 21(3) of the Regulation.
22. The certificates of competence can be issued by a simplified procedure, as envisaged by Article 29(2) of the Regulation, to people demonstrating relevant professional experience of at least three years.

5.1.4 National rules

Legal Requirements

Article 26 of Regulation (EC) No 1099/2009.

Findings

23. As required by Article 26 of the Regulation the DGAL informed the Commission about national rules in place for killing and related operations of animals outside of a slaughterhouse, and for slaughtering without stunning under religious rites.
24. The national requirements for killing outside of a slaughterhouse are included in Article R.231-6 of the Rural and maritime fishing code (*Code rural et de la pêche maritime*). Killing outside a slaughterhouse is authorised (see also section 5.3.2), amongst others, when:
 - Animals of the bovine, porcine, equine or ratite species need to be emergency slaughtered due to an accident;
 - Large farmed wild ungulates slaughtered in the farm where they are reared;
 - Animals of the caprine, ovine, porcine species as well as poultry and lagomorphs when the slaughter is done by the person who reared the animals, and all the animals slaughtered are destined for consumption by his/her family.
25. The national requirements to allow ritual slaughter with derogation from prior stunning are included in the Ministerial Decree (*Décret*) N. 2011-2006 of 28 December 2011, and the Ministerial Decision (*Arrêté*) of the Ministry of Agriculture also of 28 December 2011. In order to perform slaughter without prior stunning, since 1 July 2012, slaughterhouse operators must previously obtain approval of such derogation (see also section 5.3.1.4). The approval does not expire but the application has to include information detailing:
 - the species that will be slaughtered, the estimated slaughter volumes and estimated percentage of those to be slaughtered without stunning;
 - the equipment and facilities for handling, restraining and bleeding those animals;
 - the qualifications of the line workers for slaughter without stunning;
 - the standard operating procedures to be followed during slaughter without stunning, indicating in particular the adjustments of the line speed to the expected bleeding time and the methodology to verify loss of consciousness;
 - the registration system that allows verification that the use of the derogation is linked to commercial orders requiring it, and that these are kept for one year.

Conclusions on framework for controls

26. The DGAL succeeded in encouraging the development of guides to good practice. The validated cattle guide has proved useful to the sector as it was frequently used as reference by business operators.
27. The system implemented for the provision of certificates of competence to slaughterhouse workers is in line with the Regulation, with a good emphasis of practical situations facilitating operators' compliance with its requirements.
28. The DGAL has not implemented adequate measures to ensure that business operators killing fur animals have the appropriate level and certificate of competence to ensure that such killing is done without causing the animals any avoidable pain, distress or suffering.

5.2 PLANNING OF OFFICIAL CONTROLS

Legal requirements

Articles 3, 41 and 42 of Regulation (EC) No 882/2004.

Article 4(9) of Regulation (EC) No 854/2004.

Findings

29. The DGAL has established a system of risk categorisation for official controls and, as required by Article 42 of Regulation (EC) No 882/2004, adapted the multi-annual national control plan as a consequence of the Regulation becoming applicable in 2013.
30. The minimum control frequencies prescribed for all slaughterhouses in 2014 and 2015 were of one annual complete control (all veterinary sectors including animal welfare) and one annual thematic control specifically on animal welfare. The DGAL has not identified additional particular risks (sector, killing method or period of the year) that could influence animal welfare (Article 3(a) of Regulation (EC) No 882/2004) at slaughter to be targeted within its multi-annual national control plan for increased controls.
31. The planned annual control frequencies can be increased by the local level if so desired. However, other than follow-up visits subsequent to detection of deficiencies, the five districts visited had not made any modifications, or particular targeting of sectors or killing method, to the planned annual frequencies prescribed centrally.
32. During the year a review of the performance of this planned programme is required and subsequent to the review the planning of controls can be adjusted. If the district notes that there will be difficulties in respecting the minimum frequency of one annual complete control the DGAL must be notified of this and of the reasons for it. No such notification was sent to the DGAL in 2013 and 2014.
33. Documented evidence was seen that:
 - these planned frequencies had been respected;
 - the annual animal welfare thematic inspections now covered all species;
 - and that, as required by Article 4(9) of Regulation (EC) No 854/2004, the controls were sometimes done unannounced.

Conclusion on planning of official controls

34. There is a risk-based inspection system in place which includes animal welfare as criteria and is generally in line with the requirement of Regulations (EC) No 882/2004 and 854/2004.

5.3 OFFICIAL CONTROLS ON BUSINESS OPERATOR'S OBLIGATIONS

Legal requirements

Articles 8, 9 and 10(2)(a) of Regulation (EC) No 882/2004.

Article 5 (1)(c) and Section I, Annex I, to Regulation (EC) No 854/2004.

Articles 6 and 17 of Regulation (EC) No 1099/2009.

Findings

35. The official instructions and procedures in place for official veterinarians (OV) and auxiliaries to carry out their animal welfare tasks at slaughterhouses have been recently updated for poultry. Additional modifications are already planned to the instructions covering all species (draft new instruction for mammals was provided to the audit team) in order to place more emphasis on the evaluation of the content of the operators' standard operating procedures (SOP).
36. As required by Article 10 (2) (a) of Regulation (EC) No 882/2004 the official controls do include the examination of the animal welfare control systems that business operators have put in place. However, at the moment the instructions for/and the official controls:
 - are still focusing on the correct performance of slaughter and related operations;
 - and that the respective support guidance (such as training and work instructions) is made available to line workers;
 - but have not fully started checking if the operators' SOP contain all the information required by Article 6 of the Regulation to ensure that the business operator has planned and will carry out the slaughtering and related operations while sparing the animals from any avoidable pain, distress or suffering, as required by Article 3(1) of the Regulation.
37. The above resulted in gaps and shortcomings in the SOP and animal welfare registers, namely on:
 - planning of arrivals and respective registers;
 - feeding of pigs staying over 12 hours at the slaughterhouse;
 - key parameters for stunning;
 - monitoring of stunning (see also paragraphs 56, 57, 62, 67 and 68); which had not been noted by the OV in many cases.
38. Nevertheless, in the large majority of cases, that had not caused major animal welfare problems. This was due to the fact that the focus of the official supervision on the correct performance of slaughter and related operations did result in the operators performing procedures that had not been included or referenced anywhere in the SOP, and/or had preventive measures in place that had not been described in the SOP, and for which they did not produce records.
39. The reports of the official controls, when together with the respective cover letter to the business operators, are in line with the requirements of Article 9 of Regulation (EC) No 882/2004. Evidence was seen of request for action to be taken by business operators and

of the respective follow up. However, the system in place for official controls meant that:

- in two of the five districts visited the official supervision had identified, during the annual control on animal welfare, problems with animal welfare operations and SOP, and had confirmed that the operational problems had been addressed but did not intend to formally register if the problems with the SOP had been addressed until the next annual specific check for animal welfare.

40. AWO had been designated in all slaughterhouses visited and had the corresponding certificate of competence. The AWO had been identified by either name or position and their responsibilities and authority had generally been correctly identified in the SOP, as required by the Regulation.
41. All business operators had drafted animal welfare SOP, as required by Article 6 of the Regulation. However, all of the business operators also had gaps in their SOP and registers (see also paragraphs 56, 57, 62, 64, 67 and 68) which had gone undetected by the AWO.
42. One business operator, in addition to the more common practice of selecting production line and quality control staff to attend the AWO training, had also had some management staff attend the AWO training and examination which also demonstrated their commitment.
43. The records of AWO activities ranged between very good and almost non-existent. The involvement of the operators' quality control services, if performing internal audits also over animal welfare, had a clear positive effect in the presence of such records.

Conclusions on official controls on business operator's obligations

44. Despite recent updates to the instructions and procedures for the official supervision those instructions still focus mainly on operational matters with official controls in place not yet properly targeted into examining also the control systems put in place by business operators and the results obtained. This has facilitated the persistence of undetected gaps in the business operator's own control systems and registers.
45. Although the reports of official controls are generally in line with requirements, the system in place allows for very long periods of time between detection of shortcomings of the operators own checks systems for ensuring animal welfare and verification that those have been effectively addressed.
46. All business operators had drafted standard operating procedures and correctly designated qualified animal welfare officers. However, the gaps in the standard operating procedures and in some cases the lack of registers, together with the non-detection of those shortcomings by the animal welfare officers, meant their effectiveness to ensure good animal welfare was reduced.

5.3.1 Killing animals in slaughterhouses

5.3.1.1 Layout, construction, equipment and approval of slaughterhouses

Legal requirements

Articles 8, 14 and 29 of Regulation (EC) No 1099/2009.

Article 31(2) of Regulation (EC) No 882/2004.

Article 4(3) of Regulation (EC) No 853/2004.

Findings

47. The layout, construction and equipment of the slaughterhouses visited was generally compliant with the requirements of Article 14 of the Regulation and the official supervision had correctly reported most (see also paragraph 64 1st bullet) of the few cases or areas in which it did not.
48. One such case concerned a slaughterhouse with a cattle restraint box that was clearly inadequate (Annex II, 3.1 of the Regulation) for some of the wide variety of categories and weights of animals that it slaughtered (i.e. from calves, to meat and dairy breeds) as it had no possibility of size adjustment. The situation had been like this for several years and the official supervision had classified the cattle restraint box as a "medium non-compliance" and the whole live animal area had been noted as a "minor non-compliance" linked to the age of the structure and related persistent maintenance problems. This slaughterhouse slaughtered over 1500 cattle per week, had recently made a major investment in the processing area and had a project for upgrading the live animal area, including the cattle restraint box.
49. A list of manufacturers of restraining and stunning equipment is available and their websites are publicly available via the internet. However, instructions concerning the use of the equipment in a manner which ensures optimal conditions for animal welfare (Article 8 of the Regulation) were absent or incomplete. It was noted mainly: the absence of the weights of animals for which the equipment is intended to be used, the recommended parameters corresponding with the different circumstances of use and the method for monitoring efficiency of the equipment.
50. The DGAL stated that in general equipment manufacturers are reluctant to place in the internet instructions that might be copied by competitors and that some manufacturers are based in other EU member states with only a representative present in France.
51. The DGAL also indicated that it has not initiated yet the evaluation of the manufacturer's instructions with the help of the network of experts on technology / animal welfare / production systems that is set up within industry associations².
52. A Decision of 8 June 2006 (*Arrêté du 8 juin 2006 relatif à l'agrément sanitaire des établissements mettant sur le marché des produits d'origine animale ou des denrées contenant des produits d'origine animale*), as amended, correctly integrates the requirements from Article 31 of Regulation (EC) No 882/2004 for the competent

² In their response to the draft report the Competent Authority noted that this consultation is now ongoing.

authorities to establish procedures for operators to follow when applying for approval of their slaughterhouses.

53. The Decision of 8 June 2006 does not include any particular reference to animal welfare or Article 14 of the Regulation. The DGAL informed that additional implementing legislation is freely available to interested parties and it is the responsibility of the applicant to provide a complete approval file.
54. The approval file for a new pig slaughterhouse was evaluated by the audit team and it contained most of the information required by Article 14 of the Regulation except for the animals' weights for which the restraining equipment is adequate. Nevertheless the district could show that it had taken this parameter into account because during the approval process, and as the business operator had asked for approval to slaughter piglets, it had required that a specific restraint system be made available for restraining piglets.
55. The official supervision had correctly ensured that new stunning and restraining equipment, installed after January 2013, in several slaughterhouses visited was in line with the requirements of Article 14 of the Regulation.

5.3.1.2 Handling and restraining operations at slaughterhouses

Legal requirements

Articles 9 and 15 of Regulation (EC) No 1099/2009.

Findings

56. In all slaughterhouses visited the AWO, or a person reporting directly to the AWO, carried out the animal welfare assessment of each consignment of animals upon arrival, as required by Article 15 and Annex III(1.1) of the Regulation. The record of this assessment was frequently made in pre-existing registers that had been created for other reasons (e.g. register of "deviations from norm") without fully taking into account the underlying animal welfare requirements and reasons for registering. This resulted sometimes in the operator records not including all the required animal welfare information, namely the time of arrival of each consignment, and this had not been noted by the AWO or the OV.
57. Provisions had been made to feed and provide bedding to cattle if staying more than 12 hours at the slaughterhouses. However, contrary to the requirements of Annex III 1.2 of the Regulation, both pig slaughterhouses visited had not made provisions to feed them, and provide bedding, even if they did have animals staying at the slaughterhouse for more than 12 hours. This had not been noted by the AWO or by the OV. One business operator stated that with the type of flooring at the lairage (fully slatted floors) it would not be possible to provide litter for the pigs because it would block the drains. Nevertheless the Regulation requires 'bedding or equivalent' and it is the business operator' responsibility to provide a solution that allows proper draining and still ensures thermal comfort.

58. Handling of animals in the lairage, shackling and/or races to restraint was mostly done in line with requirements.
59. Restraint operations for mammals were satisfactory with one exception for cattle (see paragraph 48).
60. In one slaughterhouse broilers after shackled showed significant persistent vocalising, without any immediately obvious reason, and the AWO had not considered that to be a problem. At another poultry slaughterhouse the combination of strong light, loud noise, a tight bend in the line and temporary absence of a "breast comforter" meant that the broilers did not relax from shackling until entering the waterbath stunner. Both the AWO and OV were aware of the temporary absence of the "breast comforter" but it was unclear if by itself this would solve the problem.
61. SOP seen by the audit team took into consideration manufacturers' instructions concerning maintenance of restraining equipment as required, and adequate maintenance registers could be provided.
62. The SOP concerning planning, handling at arrival and unloading were frequently incomplete, without action from AWO, with variable levels of detection of such gaps by the official supervision. E.g. in two or more slaughterhouses the SOP did not include:
 - a description of the procedure for emergency killing on arrival or at the lairage (also detected by OV). Nevertheless emergency killing was done if needed;
 - sufficient information about the planning of arrivals explaining the measures (preventive or corrective) taken to ensure compliance with requirements such as maximum time span at the slaughterhouse without food, or handling of lactating animals (not detected by OV);

5.3.1.3 Stunning methods and checks on stunning

Legal requirements

Articles 4(1), 5, 9 and 16 of Regulation (EC) No 1099/2009.

Findings

63. Stunning operations seen for pigs used CO₂ at high concentration or electronarcosis, and those seen for cattle used penetrating captive bolt in all cases. The stunning operations respected the requirements of the Regulation, for both the species and methods used, and there was generally no signs of recovery of consciousness or sensibility between stunning, bleeding and the moment of death.
64. Stunning operations seen for sheep used electronarcosis.
 - In one of the two sheep slaughterhouses visited the required minimum current of 1 Ampere was not achieved in 8 of 10 animals. The line worker had not noted this until it was pointed out by the audit team and then managed to correct it. Help had to be provide by another worker as the display showing the intensity of the current being applied was placed in a location that made it difficult for the worker to keep the animal under observation and at the same time see that display. This had not

been noted by the AWO or the OV. Registers of monitoring of stunning were inadequate.

- In the other sheep slaughterhouse the current went above 1 Ampere, as required, and good electrical contact was helped by wetting of the head at the moment of application of the current.
- In both of these slaughterhouses the interval between stunning and bleeding was short and there was generally no signs of recovery of consciousness between stunning, bleeding and the moment of death.

65. Two of the poultry slaughterhouses visited that were performing slaughter under religious rites at the time of the visits also performed non-religious slaughter. One with a gas stunning method (CO₂ in two phases, see paragraph 73) and the other with electronarcosis.

66. The operators of the slaughterhouse using electronarcosis (waterbath, see also paragraph 72 second bullet point) informed the audit team that the parameters used would be the same for religious and non-religious slaughter. However, while when performing slaughter under religious rites article 4(4) allows derogating from complying with the stunning requirements in Annex I of the Regulation that is not allowed when performing non-religious slaughter but had not been enforced by the OV. Therefore the electrical waterbath parameters used would not respect the requirements when performing non-religious slaughter of:

- broilers with approximately 850g live weight, which received an average of 120mA at 600Hz (instead of the 200mA indicated in Annex I); The business operator and the DGAL disputed that these smaller birds would be covered by the requirements of Annex I to the Regulation because, according to Regulation (EC) No 543/2008 on marketing standards of poultry meat, these smaller birds would be classified as "coquelet" instead of as "broiler".
- broilers with approximately 1.8kg when to be marketed linked to a particular quality standard, because these received an average of 120mA at 400Hz (instead of the 150mA minimum indicated in Annex I).

67. The SOP on stunning operations generally complied with the requirements of Article 6 of the Regulation with the exception of SOP on gas stunning that did not include all the key parameters required in Annex I, table 3 of the Regulation (see also paragraph 73).

68. The SOP on the monitoring of stunning required by article 16 of the Regulation were in most cases incomplete, without action from AWO, and with variable levels of detection of such gaps by the official supervision. E.g. in two or more slaughterhouses the SOP did not include:

- a monitoring procedure at all (detected by OV but not in all cases);
- the verification of signs of consciousness or sensibility prior to electrical stimulation and of life (Annex III(3.2) of the Regulation) prior to scalding and dressing (not detected by OV);
- a monitoring frequency related to the relevant risk factors (detected by OV but not in all cases).

69. Business operators could show records demonstrating that stunning equipment was checked and maintained in accordance with the manufacturers' instructions, as required by the Regulation.

5.3.1.4 Slaughter under religious rites

Legal requirements

Article 4(4) of Regulation (EC) No 1099/2009.

Findings

70. Slaughterhouses performing ritual slaughter had the approval envisaged under national requirements, their SOP described how ritual slaughter would be performed and the official supervision requires frequent documented checks over it.

71. Certificates of competence could be provided showing that workers had been recognised as competent for slaughter without stunning.

72. In two poultry slaughterhouses visited the SOP showed that the electric current for waterbath stunning applied, on average per bird, an intensity (mA) to frequency (Hz) combination lower than what is indicated in Annex I to the Regulation, as allowed under Article 4(4).

- In one slaughterhouse the parameters used were always below those prescribed in Annex I of the Regulation with the average current intensity ranging between 60 to 100 mA per bird at 400Hz, instead of the 150mA indicated in Annex I.
- In another slaughterhouse chickens with approximately 850g live weight received an average of 120mA at 600Hz (instead of the 200mA indicated in Annex I) while chickens above 1kg would receive either an average of 150mA at 400 Hz (in line with the values in Annex I of the Regulation) or of 120mA at 400Hz (instead of the 150mA indicated in Annex I) if to be marketed linked to a particular quality standard.
- In both slaughterhouses the operators had carried out on site tests to determine the length of time between the application of electricity and the presence of signs of consciousness (e.g. corneal-palpebral reflex, attempts to regain posture) and this had also been checked by the OV. Nevertheless with the electricity parameters used current scientific evidence cannot guarantee that the birds have been stunned instead of just electrically immobilised, with therefore the electricity applied causing only additional pain.

73. A third poultry slaughterhouse carried out stunning with CO₂ in two phases. The OV had registered in several previous official control reports that the stunning was ineffective with signs of recovery appearing before death occurred from bleeding. Therefore, as corrective action, at the time of the visit the operator had decided that even though it was processing "light females" the stunning programme to be used was the one for "heavy males".

- At the time of the visit the stunning parameters used corresponded to the highest CO₂ concentration of the different stunning programmes available.

- The stunning was effective with the animals losing consciousness just before the 40% CO₂ concentration was achieved, as required by Annex I of the Regulation. There was generally no recovery of consciousness between stunning and the end of the bleeding.
- Both animal welfare officers were absent on the day and the SOP did not include information on key parameters such as duration of exposure and gas temperature. Stunning registers also did not include such information and the official supervision had not evaluated yet the SOP.

74. In all three poultry slaughterhouses the procedures performed, and relevant SOP, did not include a step for systematic verification of presence of signs of life prior to scalding, contrary to the required by Article 5(2) and Annex III(3.2) of the Regulation, and the OV had not reported on this.
75. Sheep slaughtered without stunning were mechanically restrained and released from the restraint only subsequent to confirming the lack of signs of consciousness or sensibility as required by Article 5 (2) of the Regulation. When the animals took too long to lose consciousness post cut stunning was applied and the animals identified as "non-ritual".
76. Business operators could indicate what percentage of their overall slaughter volume was intended for markets requesting ritual slaughter. However, the OV did not routinely verify the nationally required registers in all relevant slaughterhouses visited.

Conclusions on killing animals in slaughterhouses

77. Layout, construction and equipment and respective maintenance generally complied with requirements, contributing to the objective of sparing animals from avoidable pain, distress or suffering. However, the DGAL has not yet evaluated the existing equipment manufacturers' instructions for compliance with the Regulation, nor ensured that all the manufacturers make those instructions publicly available via the Internet as required. This means that it is more difficult for operators to ensure the equipment is used under optimal conditions.
78. Although the district did consider animal welfare at the time of slaughterhouse approval, Article 14 of the Regulation was not fully integrated in this procedure and as a result the necessary data is not guaranteed to be provided to the competent authority as required.
79. Animal welfare assessment of the animals upon arrival, and their handling, moving and restraining was largely done in line with requirements. There was one systematic exception, no provision of feed to pigs that stayed in the slaughterhouse for more than 12 hours, and there were also problems arising from the shackling of broilers. SOP concerning the operations in this area frequently did not include all operations performed and registers were sometimes very incomplete.
80. The mammal slaughterhouses visited respected the stunning methods and respective parameters required by the Regulation, with the exception of one sheep slaughterhouse that was unaware that it was not doing so. However, in the case of electrical waterbath stunning of poultry the business operator did not respect the minimum parameters prescribed in Annex I and the official supervision had not enforced them.

81. Monitoring of stunning or, during ritual slaughter, of presence of signs of life, respective standard operating procedures and registers in general did not comply with the requirements of the Regulation, and AWO, and sometimes also OV, had not noted this. The non-detected lack of checks for signs of life, during both ritual and non-ritual slaughter, is of particular relevance since it can have very bad animal welfare consequences if resulting in animals scalded or dressed while still sensitive.
82. Ritual slaughter was generally performed in line with national requirements, except for the lack of routine verification of volumes processed against commercial orders for ritually slaughtered animals.

5.3.2 Killing animals outside slaughterhouses

Legal requirements

Article 6 and 7 of Regulation (EC) No 1099/2009.

Findings

83. The national legislation does not allow the killing of non-productive animals, unfit for human consumption, by their keepers but only by veterinarians.
84. According to the DGAL it is being considered to change the legislation so as to allow keepers to kill animals that are suffering. The DGAL indicated that this is one of the objectives of the draft National Strategy Plan for Animal Welfare 2015-2020 as well as to avoid the transport of unfit animals.

5.3.2.1 Emergency slaughter outside the slaughterhouse

Legal requirements

Article 3 and Chapter I of Annex I to Regulation (EC) No 1/2005.

Regulation 853/2004 Annex III section I chapter VI.

Findings

85. Information at national level to get an overview of the number of slaughterhouses that accept to receive carcasses of animals that had suffered an accident and had been slaughtered in the farm for animal welfare reasons (as envisaged by Regulation 853/2004 Annex III section I chapter VI) for processing was not available. In one district visited only one slaughterhouse accepted to do this and it had received an average of one to two such carcasses per year.
86. In two cattle slaughterhouses the audit team carried out a revision of the documentation related to 19 animals that came from farms accompanied by a veterinary certificate for cattle sent to slaughter because of an accident (*Certificat Vétérinaire d'Information*) and noted that:

- 10 of those animals had one broken limb and were nevertheless transported to the slaughterhouse. National guidance allows the transport, with particular care, of these animals, contrary to point 2(a) of Chapter I of Annex I to Regulation (EC) No 1/2005 which lays down that animals unable to move independently without pain or walk unassisted shall not be considered fit for transport.
- No effective action by the OV at these slaughterhouses or at district level had been taken to correct this.
- The veterinary certificate did not include any statement about the fitness for transport of the animal. The DGAL indicated that a new certificate model is under preparation that includes such a statement.

5.3.2.2 *Killing of fur animals*

Legal requirements

Article 7(3) of Regulation (EC) No 1099/2009.

Findings

87. The DGAL indicated that in France there are around 10 fur farms (mink mainly) and that this number has been stable for several years.
88. Following DGAL instructions the districts with fur farms have sent instructions to the farmers reminding them:
- to notify the competent authority in advance when animals are to be killed; and
 - of the obligation to have persons with the appropriate level of competence carrying out the killing of fur animals and that such killing must be done under the direct supervision of a person holding a certificate of competence. However no such notification had been received by the districts nor had on-site supervision been done.

Conclusion on killing animals outside slaughterhouses

89. The legislation in place and the lack of a system to facilitate the killing on farm, and subsequent transport to slaughterhouses, of injured animals that are in pain and unfit for transport, results in many bovines unfit for transport still being transported to slaughterhouses. Current national guidance allows this with no enforcement actions being taken and significant negative impact on animal welfare.
90. The DGAL has not implemented adequate measures to ensure that business operators killing fur animals provide notification to the competent authority in advance of killing the animals and cannot therefore ensure that, if so desired, it will be able to supervise such killing to verify that it is done without causing the animals any avoidable pain, distress or suffering.

5.4 MONITORING OF BROILER WELFARE AT THE SLAUGHTERHOUSE AND FOLLOW UP

Legal requirements

Article 3(1)(b) and point 3 of Annex III of Directive 2007/43/EC.

Findings

91. The DGAL has issued several instructions on the monitoring of broiler welfare required by Article 3(1)(b) and Annex III of Directive 2007/43/EC.
92. Documents accompanying the birds to the slaughterhouse include a field for the cumulative daily mortality rate, as calculated by the owner or keeper, but not for the daily mortality rates despite both of those being required by point 1.1 of Annex III to Directive 2007/43/EC. Instead of the daily mortality rate only the sum of the 10 first days of life and the sum of the 15 days previous to slaughter are recorded. The DGAL indicated that they consider that data currently provided is sufficient and if necessary the OV can request more data from the farmer. However, despite the possibility to access this data at a later stage:
 - Point 1.1 of Annex III of Directive 2007/43/EC does not limit the data regarding the daily mortality rate to a particular period of the birds' life; and
 - Point 1.2 of this Annex continues with the requirement for official veterinarians to check the plausibility of the data as part of the monitoring and follow-up at the slaughterhouse. Therefore the full data set on daily mortality rate, should be provided from the beginning instead of upon additional request.
93. The DGAL has set up a system for monitoring of welfare indicators in slaughterhouses as required by Point 2 of Annex III of Directive 2007/43/EC and has set triggers for action for the cumulative daily mortality rate, the mortality in the 10 first days of life, the 15 days previous to slaughter and on arrival to the slaughterhouse. Several lesions of birds rejected on post-mortem inspections, such as abnormal levels of contact dermatitis and certain systemic illness, have also been allocated triggers for action.
94. The evaluation of foot pad dermatitis is not yet included in the trigger system. The DGAL stated that work on this is on-going and results are expected before the end of 2016.
95. When the trigger levels are exceeded, the OV informs the business operators and the relevant districts, as envisaged by point 3 of Annex III of Directive 2007/43/EC. Evidence was seen of notifications to farmers and to the business operators on:
 - high number of infected skin lesions, resulting in warning letters and meetings, and also in the revision of the procedures for the harvesting machines;
 - high number of small chickens, resulting in warning letter, and business operator issuing instruction to farmers on euthanasia at farm;
 - high number of birds dead on arrival, an Administrative Warning was issued to the farmer.

Conclusion on monitoring of broiler welfare at the slaughterhouse and follow up

96. There is a system for monitoring welfare indicators in poultry slaughterhouses which

triggered enforcement actions and resulted in corrective actions. However, possible spikes in the daily mortality rates (possibly indicating poor welfare or health conditions at some point during the rearing cycle) could still result in an acceptable cumulative daily mortality rate but go undetected due to the full data on daily mortality rates not being sent.

5.5 ACTIONS TAKEN IN CASE OF NON-COMPLIANCE

Legal requirements

Articles 22 and 23 of Regulation (EC) No 1099/2009.

Findings

97. The Rural and Maritime Fishing Code identifies, in broad terms, the infringements to the Regulation that can be sanctioned according to the penalties indicated in the Penal Code. Some examples of possible infringements and respective penalties are:
- 450€, if slaughtering without possession of the necessary qualifications – certificate of competence;
 - 750€, if causing unnecessary suffering at unloading, stunning or killing and/or use of inadequate facilities or equipment for those operations and/or use of a non-approved slaughter method;
 - 1 500€, if performing ritual slaughter outside of a slaughterhouse; and
 - 2 years imprisonment and 30 000€ if performing particularly serious acts of cruelty to animals.
98. One of the objectives of the draft National Strategy Plan for Animal Welfare 2015-2020 is to improve the efficiency of actions to address mistreatment of animals. The DGAL indicated that no sanctions from the Penal Code have been applied in 2013, 2014 or 2015 in connection with infringements to the Regulation. Nevertheless two types of administrative measures were initiated in 2013 and 2014 for infringements to the Regulation:
- 16 Administrative Warnings (*avertissement administratif*) in 2014, and 3 in 2013;
 - 9 Notices (*mise en demeure*, a formal procedure that can progress into sanctions) in 2014, and 2 in 2013.
99. For the slaughterhouses visited, and exclusively for non-compliances with the Regulation, the audit team saw recent instances of a district issuing one Administrative Warning and another two districts issuing a Notice. These administrative measures were initiated, respectively, because of:
- lack of several animal welfare standard operating procedures and registers; and
 - ineffective stunning (see also paragraph 73), and birds that had escaped the neck cut. In all cases the operators had initiated corrective measures by the date of the visit.

100. Nevertheless, the situation referenced in paragraph 48 with the inadequate restraint box for cattle shows a long-standing non-compliance that is covered by the Penal Code, and with an impact on a high number of animals, for which the district did not use any administrative measures or sanctioning powers.

Conclusions on actions taken in case of non-compliances

101. The official supervision has legal sanctioning powers as required by the Regulation but has managed to obtain corrective actions from the operators via the exclusive use of administrative measures without recourse to sanctions. However, non-compliances linked to structural shortcomings present for years had not been object of administrative measures nor sanctions.

5.6 EVALUATION AND REVIEW OF OFFICIAL CONTROLS

Legal requirements

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

Findings

102. The draft National Strategy for Animal Welfare 2015-2020 supports the provision of technical resources to the inspection services. In order to ensure the effectiveness and appropriateness of official controls, required by Articles 4 and 8(3) of Regulation (EC) No 882/2004, in this area the audit team saw that the DGAL has a system in place with measures such as:

- animal welfare training of officials when taking up of functions with subsequent continuous or refresher training;
- harmonised animal welfare checklists and instructions;
- exchange of practices directly between officials by performing accompanied inspections at neighbouring slaughterhouses and formally evaluating one another. And through 1-day regional training sessions, with particularly qualified and experienced officials designated as trainers (the national reference officials for slaughterhouses) and a maximum of 20 participants (per session) that can be official veterinarians and auxiliaries based at slaughterhouses and their respective heads of service. 28 of these sessions were organised in 2014 for mammals and 10 for poultry;
- controls over the correctness of official reports issued to the slaughterhouse operators;
- an accredited quality management system.

103. The DGAL informed the audit team that it has obtained budgetary approval for 60 additional posts in 2015 with 34 full time equivalent from these attributed to the area of

inspections at poultry slaughterhouse. An additional increase is planned again for 2016 and 2017.

104. The system of audits in France includes quality management audits over the veterinary services and separate DGAL internal "technical" audits.
105. The technical audits focused, from 2008 until end 2013, in trying to achieve sufficient improvements in slaughterhouses to raise them all to an overall classification (covering some animal welfare aspects amongst many others) rating of at least II. Classification ratings go from I, best, to IV, worst, and by the end of 2013 there were no more slaughterhouses classified as IV and 15 classified as III. Therefore the planning was for audits in subsequent years to start focusing on slaughterhouses classified as II.
106. Nevertheless none of the five districts visited had been audited since 2013 specifically for animal welfare. The DGAL informed that the technical audits are not systematic but instead on a basis of "when needed".
107. Evidence was provided to the audit team of the availability of the national reference officials for slaughterhouses to carry out such audits and/or to supervise and provide technical support on site upon request.

Conclusions

108. The system of evaluation and review of official controls on animal welfare at slaughter has been done with a collegial and peer review type of approach (exchange of experiences plus accompanied inspections) while technical audits focused exclusively on operators' performance. This resulted in some shortcomings of the official supervision (i.e. such as non-detection of some gaps in business operators animal welfare own checks and registers, long time span between detection of shortcomings in business operators standard operating procedures and verification if correctly addressed) going unnoticed until this FVO audit.

5.7 FOLLOW UP

The table below summarizes the follow-up to the relevant recommendation(s) made in report DG(SANCO) 2013-6688-MR Final.

<i>No</i>	<i>Recommendation</i>	<i>Assessment</i>
7	In order to comply with animal welfare requirements, CAs should ensure that the deficiencies in relation to animal welfare identified by the audit team in slaughterhouses are corrected and are not present in other approved establishments. In particular, stunning of birds shall be carried out in line with Article 4 and checks on stunning are to be carried out in line with Article 5 of Regulation (EC) No 1099/2009.	The competent authorities have implemented the measures proposed (see paragraphs 5, 33, 35 and 103) but those have not successfully addressed the required by Articles 4 and 5 of the Regulation. Stunning of birds and checks on stunning are not yet in line with the Regulation (see paragraphs 66, 68, 73, 74, 80 and 81 and recommendations 4 and 7 of the current audit report).

6 OVERALL CONCLUSIONS

The situation in France is broadly satisfactory from a point of view of animal welfare at slaughter, with the exception of:

- ritually slaughtered poultry, for which there is no scientific evidence indicating that the electric parameters used will provide sufficient stunning;
- poultry that undergo electrical waterbath stunning with parameters below those required by the Regulation, without enforcement measures being taken by the competent authorities.

Other than the above, and the monitoring of stunning, slaughterhouse operations are generally in line with animal welfare requirements. Nevertheless, the slaughterhouses' own control systems as described by their standard operating procedures do not sufficiently or correctly describe those operations, nor include adequate records, to provide sufficient assurances to the competent authority of their level of compliance with the requirements of the Regulation.

The system of official controls in place is detecting the major operational non-compliances with the Regulation, and generally requesting corrective actions from operators. However it has not shifted yet to verifying the own checks systems of the business operators' controls and therefore also not started yet to detect and address the gaps in those systems.

Existing documentation indicates that animals unfit for transport (Regulation (EC) No 1/2005) are frequently transported to slaughterhouses, under the support of veterinary certificates, and no effective actions have been taken to correct this.

7 CLOSING MEETING

A closing meeting was held on 17 April 2015 with representatives of the DGAL, at which the main findings and preliminary conclusions of the audit were presented by the audit team. DGAL representatives stated that efforts to improve the system have already started with the implementation of the draft French National Strategy for Animal Welfare 2015-2020 and provided some clarifications.

8 RECOMMENDATIONS

No.	Recommendation
1.	<p>The competent authority should ensure that persons carrying out killing and related operations for fur animals have certificates of competence as required by Article 7 of Regulation (EC) No 1099/2009.</p> <p>Conclusions and findings upon which this recommendation is based: 15 and 28.</p>
2.	<p>The competent authority should further develop documented procedures, as required by Article 8 of Regulation (EC) No 882/2004, for official controls to improve the awareness</p>

No.	Recommendation
	<p>and capacity of officials to effectively detect non-compliances with Regulation (EC) No 1099/2009, as required by Article 4(2)(a) of Regulation (EC) 882/2204, particularly in relation to the standard operating procedures, and monitoring procedures and relevant records, required respectively by Articles 6 and 16 of Regulation (EC) No 1099/2009.</p> <p>Conclusions and findings upon which this recommendation is based: 35, 36, 37, 44, 56, 57, 62, 67, 68, 73, 74, 79 and 81.</p>
3.	<p>The competent authority should improve its official control system to ensure that all districts carry out a timely verification of correction of non-compliances reported to business operators in order to ensure the effectiveness, quality and consistency of official controls, as required by Article 4(2)(a) and (5) of Regulation (EC) No 882/2204.</p> <p>Conclusions and findings upon which this recommendation is based: 39 and 45.</p>
4.	<p>The competent authority should take measures to improve the awareness of business operators/animal welfare officers of the relevant requirements of Regulation (EC) No 1099/2009 in order to improve their capacity to: develop standard operating procedures and registers that fully reflect their operations; and detect and address gaps or mistakes in their operations and corresponding standard operating procedures, as required by Article 6(2) of that Regulation.</p> <p>Conclusions and findings upon which this recommendation is based: 41, 43, 46, 56, 57, 62, 64, 67, 68, 73, 74, 79 and 81.</p>
5.	<p>The competent authority should update the instructions to approve slaughterhouses to include the requirements of Article 14(2) of Regulation (EC) No 1099/2009 as required by Article 31(2) of Regulation (EC) No 882/2004.</p> <p>Conclusions and findings upon which this recommendation is based: 53, 54 and 78.</p>
6.	<p>The competent authority should ensure that, as required by Article 8 of Regulation (EC) No 1099/2009, appropriate instructions for restraining and stunning equipment accompany that equipment when sold, and that those instructions are also made publicly available by the manufacturers via the Internet.</p> <p>Conclusions and findings upon which this recommendation is based: 49, 50, 51 and 77.</p>
7.	<p>The competent authority should ensure that when poultry is not subject to particular methods of slaughter, prescribed by religious rites, the stunning parameters specified in Annex I of Regulation (EC) No 1099/2009 for electrical water bath stunners are applied as required by Article 4(1) of Regulation (EC) No 1099/2009.</p> <p>Conclusions and findings upon which this recommendation is based: 66 and 80.</p>
8.	<p>The competent authority should take measures to ensure that only fit animals are transported to slaughterhouses, as required by point 1 of Chapter I of Annex I to</p>

No.	Recommendation
	<p>Regulation (EC) No 1/2005, and take the necessary measures to ensure that when cattle not fit for transport arrives at slaughterhouses effective enforcement action is taken, as required by Article 54 of Regulation (EC) No 882/2004.</p> <p>Conclusions and findings upon which this recommendation is based: 86 and 89.</p>
9.	<p>The competent authority should take measures to ensure that business operators of fur farms notify the competent authority in advance when animals are to be killed as required by Article 7(3) of Regulation (EC) No 1099/2009.</p> <p>Conclusions and findings upon which this recommendation is based: 88 and 90.</p>
10.	<p>The competent authority should extend the system for monitoring of broiler welfare so that full records of daily mortality rates accompany the broilers to slaughterhouses, as required by point 1.1 Annex III of Directive 2007/43/EC.</p> <p>Conclusions and findings upon which this recommendation is based: 92 and 96.</p>
11.	<p>The competent authority should take measures to improve the system of evaluation and review of official controls so that it can ensure the effectiveness of those controls, as required by Article 8(3) of Regulation (EC) No 882/2004.</p> <p>Conclusions upon which this recommendation is based: 44, 45 and 108.</p>

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Reg. 1099/2009	OJ L 303, 18.11.2009, p. 1-30	Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
Reg. 1/2005	OJ L 3, 5.1.2005, p. 1-44	Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/97
Dir. 2007/43/EC	OJ L 182, 12.7.2007, p. 19-28	Council Directive 2007/43/EC of 28 June 2007 laying down minimum rules for the protection of chickens kept for meat production
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Dir. 93/119/EC	OJ L 340, 31.12.1993, p. 21-34	Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing
Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Reg. 543/2008	OJ L 157, 17.6.2008, p. 46-87	Commission Regulation (EC) No 543/2008 of 16 June 2008 laying down detailed rules for the application of Council Regulation (EC) No 1234/2007 as regards the marketing standards for poultrymeat

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_inspection_ref=2015-7427

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Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Reg. 1/2005	OJ L 3, 5.1.2005, p. 1-44	Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/97
Reg. 1099/2009	OJ L 303, 18.11.2009, p. 1-30	Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing
Dir. 2007/43/EC	OJ L 182, 12.7.2007, p. 19-28	Council Directive 2007/43/EC of 28 June 2007 laying down minimum rules for the protection of chickens kept for meat production