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FINAL REPORT OF AN AUDIT
CARRIED OUT IN
IRELAND
FROM 15 FEBRUARY 2016 TO 22 FEBRUARY 2016
IN ORDER TO
EVALUATE THE MEASURES TO ENSURE THE WELFARE OF CATTLE ON DAIRY
FARMS

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

Executive Summary

The report describes the outcome of an audit in Ireland from 15 February 2016 to 22 February 2016 as part of the published DG Health and Food Safety audit programme.

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

The report concludes that the measures in place generally ensure the welfare of cattle on dairy farms.

The Irish national strategy for dairy farming actively involves the competent authority and all actors in managing animal welfare on dairy farms including the occurrence of mastitis, lameness, reproductive and metabolic diseases and disease in calves. Common actions are being implemented by the farming community with improving trends in the majority of welfare indicators. This is particularly the case where actions are being addressed by several actors from the industry, such as the prevention of mastitis and survivability. On the other hand, where actions are only addressed by a limited number of actors, such as on the prohibition of tail docking, awareness levels of the national legislation on tail docking are low and there is a continuing, albeit low level, of non-compliance with this requirement.

The report makes one recommendation to the competent authority, aimed at addressing the issue of tail-docking in cows.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
AHWD	Animal Health and Welfare Division
AHI	Animal Health Ireland
Bord Bia	the Irish Food Board
CA	Competent authority
CAP	Common Agricultural Policy
DAFM	the Department of Agriculture, Food and the Marine
DG	Directorate General
EU	European Union
FAWAC	Farm Animal Welfare Advisory Council
ICBF	Irish Cattle Breeding Federation
ICMSA	Irish Creamery Milk Suppliers Association
ICOS	Irish Co-operative Organisation Society
IFA	Irish Farmers' Association
the Recommendation	Council of Europe recommendation concerning cattle of 21 October 1988
SCC	Somatic Cell Count
SDAS	Sustainable Dairy Assurance Scheme
S.I.	Statutory Instrument
Teagasc	the Agriculture and Food Development Authority
UCD	University College Dublin

1 INTRODUCTION

This audit took place in Ireland from 15 to 22 February 2016 as part of the planned audit programme of DG Health and Food Safety. An opening meeting was held with the competent authorities on 15 February 2016. At this meeting, the objectives of, and itinerary for, the audit were confirmed by the audit team and additional information required for the satisfactory completion of the audit was requested.

The audit team comprised two auditors from DG Health and Food Safety and was accompanied throughout the audit by representatives from the Competent Authority (CA) – the Department of Agriculture, Food and the Marine (DAFM).

2 OBJECTIVES AND SCOPE

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

In particular the audit tried to identify what factors influence the steps¹ taken by dairy farmers to minimise the occurrence of mastitis, lameness, injuries, reproductive and metabolic diseases and disease in calves.

The scope of the audit included:

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

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

- Involvement of advisory services such as farm advisory or private veterinary groups; and
- The audit concentrated in the period 2013 – January 2016.

In addition to the scope, information was collected on the prudent use of antimicrobials in dairy farms (see Annex 2).

The main legal requirements are included in:

- Council Directive 98/58/EC concerning the protection of animals kept for farming purposes;
- Commission Decision 2006/778/EC concerning minimum requirements for the collection of information during the inspections of production sites on which certain animals are kept for farming purposes;
- Council of Europe recommendation concerning cattle of 21 October 1988² ("the Recommendation"), and in particular those provisions which relate to:
 - a. Inspection of animals for good health and where there are signs of ill health the taking of steps to establish the cause and take remedial actions (Article 3 and 4 of the Recommendation);
 - b. Maintenance of good conditions of hygiene, limiting the risk of disease or traumatic injuries, and provision of accommodation which allows animals room to lie down, to rest and to rise (Article 6 and Appendix B of the Recommendation);
 - c. Seeking advice on welfare aspects when new buildings are to be constructed or existing buildings modified (Article 7 of the Recommendation); and
 - d. Following of certain procedures when mutilations are carried out (Article 17 of the Recommendation).
- Council Directive 2008/119/EC lays down minimum standards for the protection of calves. However, the scope of this audit was limited to the provisions laid down in paragraphs 6 and 15 of Annex I to the Directive regarding:
 - a. inspections of calves;
 - b. treatment where a calf appears to be ill or injured;
 - c. obtaining veterinary advice for any calf which is not responding to the stock-keeper's care; and
 - d. providing bovine colostrum to each calf as soon as possible after it is born.
- Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

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

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

Meetings with Competent Authorities			Comments
Competent authority	Central	2	Opening and closing meetings with representatives from the Animal Health and Welfare Division (AHWD) and the Milk Policy Division within DAFM.
	Other	3	Meetings with the representatives of the Regional Veterinary Offices of Limerick, and Waterford & Kilkenny. Meeting with representatives from the CAP Rural Development Division within DAFM.
Site visits			
Dairy Farms		2	Visits to two dairy farms in the counties of Limerick and Kilkenny
Meetings with representatives of bodies contributing to the welfare of cattle in dairy farms		4	Meetings with representatives from: <ul style="list-style-type: none"> • the Farm Animal Welfare Advisory Council (FAWAC); • the Agriculture and Food Development Authority (Teagasc); • Animal Health Ireland (AHI); • the Irish Cattle Breeding Federation (ICBF); • the Irish Food Board (Bord Bia); • the Irish Farmers' Association (IFA); • the Irish Co-operative Organisation Society (ICOS); • the Irish Creamery Milk Suppliers Association (ICMSA); • the University College Dublin (UCD); • Vet Ireland.

3 LEGAL BASIS

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

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

4 BACKGROUND

EU animal welfare rules for dairy cattle stem from Council Directive 98/58/EC which provides general requirements for animal welfare in all farmed species. These rules are based on the 1978 European Convention for the Protection of Animals kept for Farming Purposes drawn up within the Council of Europe³. Pursuant to Article 9 of the European Convention, in 1988 the Council of Europe adopted a Recommendation Concerning Cattle which has subsequently become part of EU law. Furthermore since 2003, the reform of the Common Agriculture Policy (CAP) has introduced the concept of cross-compliance. In this framework direct payments to farmers will be granted only if farmers comply with certain animal welfare rules⁴.

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

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

One of the aims of the abolition of quotas is to increase efficiency through economies of scale in milk production. This is a potential risk for animal protection standards.

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

In 2015 there were 17,500 dairy farms in Ireland with an average herd size of 64 cows – approximately 1.1 million dairy cows. 52% of dairy farmers were over 50 years of age. In 1984 there were 80,000 dairy farms with an average herd size of 18 cows – approximately 1.4 million dairy cows. Average milk production per cow increased from 3,500 litres to 5,200 litres over this period.

³ The EU approved this Convention by Decision 78/923/EEC (OJ L 323, 17.11.1978, p. 12)

⁴ Regulation (EC) No 1782/2003 (OJ L 270, 21.10.2003, p. 1).

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

5 FINDINGS AND CONCLUSIONS

5.1 ACTORS INVOLVED WITH THE WELFARE OF DAIRY CATTLE

1. The national policy on dairy farming is for a sustainable and profitable farming system modelled to the Irish environment. The model for the system aims therefore at maximising the use of pasture with a cow that is suited to it. The CA Statement of Strategy 2015-2017 includes as one of its objectives, to promote and enhance animal welfare.
2. By 2020 the dairy industry expects to increase its production by 50% compared to the level during the milk quota system. At the end of 2015 dairy production was 6.6 billion litres – an increase of 16% compared to this level.
3. A representative of the Irish Farmers' Association (IFA) confirmed to the audit team that the average size of dairy herds is increasing. The aim is to have a sustainable pasture-based system which maximises grass use and the time spent on pasture (7.5 months on average) and to increase the longevity of the cows. 92% of the cows in the national dairy herd calve in spring so that the cows are out in pasture, benefiting from the maximum period of grass growth, until winter when they are dried simultaneously. Only 8% of the cows in the dairy herd calve throughout the rest of the year to provide a continuous supply of fresh milk.
4. The Animal Health and Welfare Division within DAFM:
 - is responsible for developing and implementing the system of official controls on animal welfare (refer to Section 5.2);
 - co-ordinates the Early Warning Intervention System developed in 2004 by the Farm Animal Welfare Advisory Council (FAWAC). This system involves groups of local representatives from DAFM, the IFA, ICMSA, Teagasc, ICOS, the Irish Society for the Prevention of Cruelty to Animals, UCD, the Department of Agriculture and Rural Development Northern Ireland, and Vet Ireland. These local groups work together to identify farms that risk encountering difficulties of a financial, social or management nature so that the CA can intervene at an early stage in order to prevent the conditions on farms, including animal welfare, from deteriorating.
5. The CAP Rural Development Division within DAFM is involved in the allocation of Rural Development Funds and in cross-compliance controls. Concerning Rural Development Funds, a representative of the CAP Rural Development Division indicated that:
 - there is a total of 395 million Euro to be distributed between all farming sectors from 2015 to 2020;
 - there are three schemes under TAMS II (the Target Agricultural Modernisation Scheme II) available for dairy farmers that contribute to the welfare of cattle on dairy farms.:

- one scheme is for the purchase of new dairy equipment, which would enable better hygiene at milking and therefore reduce the risk of mastitis;
 - schemes for animal housing respecting prescribed DAFM farm building specifications are included in the "Animal welfare, safety and nutrient storage scheme" and the "Young farmer capital investment scheme". The DAFM specifications include animal welfare relevant parameters such as cubicle house layout, cubicle bed design, natural light and ventilation, minimum Lux for artificial lighting, calving pens, etc.;
 - the "Young Farmer Capital Investment Scheme" is for farmers younger than forty that had recently started a dairy activity (less than five years' activity). Under the other two schemes priority is also given to young farmers.
- a fourth grant concerning knowledge transfer is also available for farmers in all sectors (total funds available: 100 million Euro) and will start in the second quarter of 2016. Under this scheme:
 - dairy farmers are required to attend five Knowledge Transfer Group meetings each year for three years. These groups involve other dairy farmers and an Agriculture and Food Development Authority (Teagasc) advisor, and are organised similarly to the Dairy Discussion Groups organised by Teagasc (see also paragraph 7);
 - a private veterinary practitioner must be involved in at least one of the meetings for each of the three years;
 - farmers will be required to develop a farm management plan together with their private veterinary practitioner;
 - applicant farmers are required to be involved in the Irish Cattle Breeders Federation (ICBF) Dairy HerdPlus programme (see also paragraph 9);
 - there had been applications for 415 dairy groups involving a total of 6,870 dairy farmers (39%) up to February 2016.
 - a Training Advisory Service on Animal Health is also being funded to train private veterinary practitioners. The CA indicated that private veterinary practitioners play an important role for good farm animal health and welfare. Under this scheme Animal Health Ireland (AHI) trained approximately 400 veterinary practitioners on the eradication of Bovine Viral disease (in 2015), and will provide training for Johne's disease (in 2016) and the CellCheck programme (in 2017 – see also paragraph 8). Dairy farmers will have access to one session of free advice from private veterinary practitioners who avail of this training.

6. The FAWAC:

- is an advisory board to the Minister for Agriculture, Food and the Marine;
- includes representatives from DAFM, Teagasc, IFA, University College Dublin (UCD), the Irish Creamery Milk Suppliers Association (ICMSA), the Irish Co-operative Organisation Society (ICOS) and Vet Ireland. Although farmer representatives are members of the Council, the farmers met by the audit team were not aware of the FAWAC;

- published in 2003 the guidance document "Animal Welfare Guidelines for Dairy Farmers". These guidelines are available online and at local CA offices and are currently being revised. The guidelines make reference to the requirements of Directive 98/58/EC including good stockmanship, adequate construction, proper feeding, herd health and mastitis control, and permitted mutilations.
7. Teagasc is part-funded by DAFM and is involved in research, training and advice:
- The research is focussed on grazing systems and on delivering this information to farmers through the advisory service. Research areas include:
 - the Dairy Cow Genetic Improvement programme which is focussed on cows that are suitable for the pasture-based Irish dairy system;
 - the Health and Welfare programme, together with AHI (see also paragraph 8), including for the management of mastitis and lameness;
 - Milk Production Systems and Economic Analysis of said systems.
 - The advisory service comprises 80 advisors covering 11,000 dairy farmers (63%) who are members of Teagasc. It encourages farmers to adopt best practices and provides training opportunities:
 - Advice is provided on milk quality, somatic cell count (SCC), dry-cow management, adequate building design, animal health and herd fertility, nutrition and body-condition score.
 - The advisors meet the dairy farmers on a one-to-one basis and as part of Dairy Discussion Groups. There are 350 discussion groups throughout the country that are generally held on the farm of one of the group members. The purpose of these discussion groups is to bring the farmers together and share experiences and good practices in dairy farm management.
 - Four training courses are provided for future and upscaling dairy farmers and include training on animal welfare. The duration of these courses vary from one to four years and approximately 1,000 students are enrolled each year.
 - Teagasc has also set up a Milk Skills Training course that lasts two days. 62 courses have been organised between 2014 and February 2016 with a total of approximately 600 participants.
8. AHI is a public-private partnership created in 2009 and is partly funded by the CA. The purpose of AHI is to contribute to profitable and sustainable farming through improved animal health. Animal health programmes pursued by AHI are closely linked to financial benefit to the cattle farmers. These programmes include:
- the CellCheck programme which was established in 2010 and aims to achieve a SCC of less than 200 000 in 75% of dairy herds by 2020. This programme:
 - provides guidelines to dairy farmers on good hygiene practices and the management of mastitis in the herd;
 - provides feedback to the dairy farmers and processors on the herd's SCC. Each farmer receives information about the SCC results of his/her herd and how that

- compares with the national average;
 - includes a monthly CellCheck newsletter to inform farmers of the latest national results and provide them with technical tips that are relevant to the time of the year;
 - contains a CellCheck Cost Check Calculator that makes farmers and their advisors aware of the financial implications of mastitis;
 - provides training to farmers and their advisors on the use of the CellCheck programme. Until the audit date more than 400 advisors and 2,000 farmers had been trained;
 - established an Award Scheme in 2013 for the 500 dairy herds with the lowest SCC. In 2013 the 500 best herds had a SCC of 103 000 or less whereas in 2015 the SCC was 97 000 or less.
 - Eradication programmes for bovine viral diarrhoea, infectious bovine rhinotracheitis and Johne's disease;
 - Beef Health Check, which is a tool that utilises slaughterhouse data to control losses due to liver fluke. This programme provides farmers with useful information in order to target anthelmintic treatment in a drive to move towards responsible use of anthelmintics. It also contributes to the development of the ICBF database for genetic improvement of the dairy herd (see also paragraph 9);
 - The Calf Colostrum Management workshops, within the CalfCare programme, to transmit best practices on the provision of colostrum to calves. 1,700 farmers (9.7%) have attended the nine workshops organised until the date of the audit. Guidance leaflets on colostrum management of calves have been produced under this programme.
9. The ICBF is owned by cooperatives and large processing groups and is involved in breeding programmes in both dairy and beef. It aims for sustainable production through genetic selection. Its genetic pool database is available to dairy farmers and Teagasc through the Dairy HerdPlus programme:
- The genetic database was originally linked uniquely to milk output. In 2000 the percentage of milk solids and cow fertility were assigned an economic value and weight which was used to create an "Economic Bovine Index" designed specifically for the Irish dairy production characteristics. The Economic Bovine Index of an animal helps farmers identify the most profitable bulls and cows for breeding dairy herd replacements.
 - The index has been modified along the years with for example the addition of calving (including ease of calving) in 2005, health (mastitis, lameness and SCC) from 2006 and management from 2013. This data is collected from reports submitted by farmers enrolled in the Dairy HerdPlus programme.
 - ICBF informed the audit team that it has been breeding according to the Economic Bovine Index since 2000 and have had seven validation studies into it. According to ICBF data the national dairy herd has benefited from this breeding programme with an increase in the Economic Bovine Index from 80€ in 1996 to 160€ in 2014.

10. The Irish Food Board (Bord Bia) is funded by DAFM and has developed a voluntary Sustainable Dairy Assurance Scheme (SDAS):
- This scheme is supported by the ICMSA and the IFA and includes animal welfare requirements on the ban of tail docking, maintenance of records, building requirements, maintenance of the dairy equipment, etc.;
 - There are currently 14,300 dairy farmers, accounting for 80% of the commercial milk production in Ireland, enrolled in the SDAS, of which 10,500 have obtained SDAS certification;
 - A Bord Bia representative indicated that all the milk purchasers have signed up to the scheme implying that adherence to SDAS will be compulsory for dairy farmers in the near future. The majority of dairy farmers are expected to be enrolled in SDAS by the end of 2016;
 - SDAS dairy farmers are audited every 18 months on 170 criteria by external auditors, possessing a background on dairy farming. The purpose of this timeframe is for audits to be carried out in rotation with the animals one time on pasture and another time while indoors;
 - The criteria of the scheme have been agreed by a technical advisory committee that included representatives from Bord Bia, the CA, Teagasc, farmers and dairy processors. These criteria are described in a comprehensive explanatory document which contains as well additional recommendations that are not part of the agreed SDAS criteria but good practices aimed at increasing awareness. Although most of the animal welfare indicators identified by the CA and other actors (see also Section 5.3) are not SDAS criteria, they are included in the recommendations. A Bord Bia representative indicated it is expected that some of the recommendations could be converted into audit criteria in future revisions of the SDAS;
 - Dairy farmers must score a minimum of 60% during the audit. Total non-compliance to any of the criteria must be corrected, irrespective of the final score, and reported to Bord Bia for possible follow-up. Partial non-compliance has to be corrected and is followed-up during the following audit;
 - Detected non-compliances on animal welfare are not reported to the CA. The information about hygiene results of Bord Bia checks to dairy farms under the SDAS is however available to DAFM on request but only at central level;
 - Bord Bia has trained dairy processors' advisors on the requirements of the SDAS. This enables the advisors to prepare the dairy farmers for entry into the scheme, assist on correcting the non-compliances detected during the audit and to report the corrective actions implemented;
 - The Bord Bia representative indicated that the main non-compliance to SDAS criteria detected is the maintenance of medical records (22% of farms audited). This is also one of the most common non-compliances in cattle farms (dairy and beef) reported by the CA in 2013 and 2014 under Decision 2006/778/EC and during the 2016 pilot series of inspections on dairy cow welfare (see also paragraph 21).

11. Animal behaviour and welfare is a core module, and is also integrated in other modules, of veterinary and veterinary nurse courses provided by the UCD School of Veterinary Medicine. These courses include theoretical and practical components. Furthermore, UCD:
- provides an on-line graduate certificate course on Dairy Cow Herd Health which includes topics such as mastitis and calf health, and from which approximately 90 veterinarians have graduated;
 - carries out research on animal health and welfare.

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

Legal requirements

Directive 98/58/EC.

Commission Decision 2006/778/EC.

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

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

Regulation (EC) No 882/2004.

Findings

12. National legislation on animal welfare is found under the Animal Health and Welfare Act of 2013 which prohibits persons from doing, or failing to do, anything or causing or permitting anything to be done to an animal that causes unnecessary pain, distress or suffering. The Statutory Instruments (S.I.s) regulating the welfare of cattle of dairy farms include:
- S.I. 311 of 2010 implementing Directives 98/58/EC and 2008/119/EC amongst others;
 - S.I. 225 of 2014 on the prohibition of non-medical tail docking of cattle, as foreseen by Paragraph 19 of the Annex to Directive 98/58/EC;
 - S.I. 107 of 2014 and 127 of 2014 regulating operations and procedures carried out on cattle, as foreseen by Paragraph 19 of the Annex to Directive 98/58/EC.
13. The official controls take into account relevant risks, as required by Article 3 of Regulation (EC) No 882/2004, and staff performing those controls has received appropriate training, as required by Article 6 of Regulation (EC) No 882/2004.

14. Welfare of cattle at dairy farms is covered within DAFM official controls of the following type:
- General animal welfare inspections, as required by Article 6 of Directive 98/58/EC, of all animals that are bred or kept for farming purposes, and collecting the information required by Decision 2006/778/EC;
 - Inspections to ensure that the conditions for rearing calves comply with the requirements of Directive 2008/119/EC, and collecting the information required by Decision 2006/778/EC. The audit team was informed that if non-compliances with calf rearing requirements are detected the check on animal welfare may be expanded to become a general animal welfare inspection as immediately above;
 - Cross-compliance inspections (Regulation (EC) No 1698/2005⁶) as these include compliance checks against the requirements of Directives 98/58/EC and 2008/119/EC amongst others; and
 - In addition ad-hoc checks may be performed at any time as consequence of a complaint, suspicion or notification received.
15. There were 101 general animal welfare inspections of cattle farms (dairy or beef) in 2013 and 117 in 2014 with, respectively, 81 (80%) and 79 (68%) farms reported in full compliance. In 2013 these inspections also reported mutilations as being the most frequent non-compliance (S.I. 225 of 2014), at approximately a third of the total (10 of 32), while for 2014 mutilation non-compliances were approximately 5% of the total (3 of 61).
16. 181 inspections on conditions for rearing calves were carried out in 2013 and 204 inspections in 2014 with, respectively, 137 (76%) and 133 (65%) farms in full compliance:
- For 2014 DAFM gave inspectors a specific instruction to continue to check if replacement heifers present at the same farm had been tail-docked;
 - In both years the main non-compliances reported, 50% or more of the total, concerned 'Record keeping' together with 'Buildings and accommodation';
 - The report for 2014 submitted by DAFM to the Commission includes an analysis on the above non-compliances, as required by Article 8(2) of Decision 2006/788/EC, indicating that they respectively "concerned incomplete records of medicines administered" and "were related to cleansing and disinfection of housing, pens, equipment and utensils, the presence of sharp edges and protrusions likely to cause injury to calves and environmental conditions".
17. In 2015 there were approximately 1,350 cross compliance inspections (for all types of cattle and species other than cattle as well) that specifically included animal welfare (there are other cross compliance inspections that do not include animal welfare as one of the primary objectives but will include welfare if issues are noted during the controls). Cross compliance inspection detected 60 to 70 animal welfare non-compliances per year between 2012 and 2014. Within these the most frequently detected

⁶ Regulation (EC) No 1698/2005 (OJ L 277, 21.10.2005, p. 1–40)

in bovine animals is mutilation (specifically tail-docking, S.I. 225 of 2014) corresponding to approximately a third of the total. For a first time offence this usually results in a 5% deduction in the single farm payment. The number of mutilation non-compliances detected from 2012 to 2014 remained stable.

18. Veterinary inspectors that check animal welfare at farm have several tools available (all easily available in electronic format) to target and prepare the inspections, which they demonstrated and explained to the audit team. They include data on late registrations, disease testing, suspicious animal movements, herd numbers and mortality, reports of previous inspections, checklists and respective guidance/instructions, legislation, template documents, etc.
19. In 2016 the CA decided to target the dairy farm sector as part of its national policy on dairy farming. This was done via:
 - The development of a specific checklist – the "Dairy Cow Welfare Inspection Form" – and respective guidelines;
 - A first training session in January 2016 of veterinary inspectors to carry out such inspections;
 - A pilot series of inspections to dairy farms, planned to cover 40 herds in the seven main dairy counties in January and February 2016. The 40 herds to be inspected were selected by the central level according to the following risk criteria: herds that had undergone an expansion in the total number of cows, new "entrants" (farmers that until recently had no dairy production), herds with increased mortality;
 - The CA indicated that the pilot is to be followed by a review of the "Dairy Cow Welfare Inspection Form" and respective guidelines before a second training session for veterinary inspectors in March 2016 and the extension of these inspections to the rest of the country.
20. The "Dairy Cow Welfare Inspection Form" and respective guidelines cover the relevant legal requirements from both Directives (98/58/EC and 2008/119/EC) and the Recommendation, are a comprehensive tool to perform animal welfare checks, and provide support to carry out effective and consistent controls, as required by Articles 8 and 4 of Regulation (EC) No 882/2004.
21. DAFM provided the audit team with the following main information concerning the pilot series:
 - 39 herds were inspected with three re-inspections;
 - the highest frequency of non-compliances concerned records of medicines administered (varying from some not being available at the time of the inspection to incomplete records being maintained and also records not being kept for the required 5 years), herds with small numbers of tail docked cows (with most bought in already tail docked but in one herd the cows had been tail docked by the farmer) and availability of suitable sick pens in some farms.
 - at a lower frequency there were some issues such as insufficient cleanliness that, similarly to insufficient availability of suitable sick pens, were caused by the

increased pressure on winter accommodation (indoors) due to increased numbers of animals in the herds.

22. The audit team visited two of the dairy farms previously inspected by DAFM within the 2016 pilot series and received an on-site explanation of how the inspections were performed and how the farmers carried out their duties. The audit team did not detect any significant additional shortcomings to those previously reported by DAFM.
23. Tail docking was also detected (on 111 cows) during the above-mentioned pilot in one of the farms visited by the audit team:
 - This farmer has been a certified member of the SDAS since 2014.
 - A letter was sent informing the farmer that tail docking was a non-compliance and of the financial consequences (penalties and a reduction from single farm payments) if this was to be repeated. The farmer committed himself, in writing, not to repeat such practice.
24. The audit team was informed by the CA that farmers performing tail-docking, which was detected during both cross-compliance inspections and the pilot of 2016, claimed that they had done it for hygiene reasons and because they were unaware of the prohibition on tail-docking. The CA informed the audit team that the prohibition on non-medical tail-docking of bovines in the national legislation (lastly S.I. No. 225 of 2014) has been in place since 2003.

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

25. The CA is actively involved in measures that improve the welfare of cattle on dairy farms. Official controls provide satisfactory assurances of compliance with animal welfare requirements for cattle in dairy farms. Awareness levels on national legislation prohibiting tail docking are not high and, despite some preventive measures, there is an apparently low but continuing level of the banned practice of mutilation (tail-docking) of dairy cows.
26. The targeted dairy farms inspections during 2016, together with the other data available to DAFM should provide sufficient up to date, detailed information on welfare of dairy cows under current production conditions to allow DAFM to make well-informed decisions about what actions could be needed in this area.

5.3 INDICATORS OF ANIMAL WELFARE

Legal requirements

Directive 98/58/EC.

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

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

Findings

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

Table 1: Identified indicators of animal welfare

	WHO uses them?	HOW are they being used?	Identified TRENDS
Indicators related to MASTITIS SOMATIC CELL COUNT	Dairy Hygiene Division, AHWD (Pilot), AHI (CellCheck), ICBF, Dairy Processors, Farmers.	Official Controls. Genetic Selection, Dairy Farmer Awards, Dairy Processors (penalties/premiums), Selective dry-cow therapy (initial stages).	Steady decrease in SCC – This was below 200 000 in 50% of dairy herds in 2014.
Indicators related to LAMENESS LAMENESS SCORING	AHWD (Pilot). Farmers. ICBF.	Official Controls. Hoof Treatment. Genetic Selection.	Farmers indicated low frequency but no data provided.
Indicators related to REPRODUCTIVE diseases/issues EASE OF CALVING	Farmers, ICBF, Bord Bia.	Sire selection to minimise calving difficulties.	Industry representatives indicated a shift towards smaller cows in the dairy herd but insufficient data provided to support this.
Indicators related to REPRODUCTIVE diseases/issues SURVIVABILITY (linked to Ease of Calving)	AHWD (Pilot). ICBF, Farmers.	Official Controls (mortality records). Genetic Selection.	Average dairy cow currently kept for 4.5 lactations. Industry aiming for 5.5 lactations.
Indicators related to METABOLIC diseases BODY CONDITION SCORE	AHWD (Pilot). Farmers, AHI, FAWAC.	Official Controls. Ideal Body Condition Scores depending on the cow's production cycle.	
OTHER Indicators TAIL DOCKING	AHWD, Cross-Compliance. Bord Bia.	Official Controls, Single Farm Payments (penalties). SDAS.	CA detects a low frequency but stable (not decreasing) trend. Not a frequent non-compliance in Bord Bia's SDAS audits.

28. All the identified animal welfare indicators are included in the Dairy Cow Welfare Inspection Form and guidelines created by the CA for the pilot series of inspections on animal welfare in dairy farms.

29. According to farmers and other actors from the industry good dairy cow welfare translates into a healthy animal (free of disease, including mastitis and lameness) that has a high survivability (good calving rate without difficulties and used for a high number of lactation cycles). An average cow is currently used for 4.5 lactations and the aim is to increase this to 5.5 lactations.
30. Mastitis causes pain and suffering in the dairy cow. One indicator of this disease is the increase of SCC in milk. A low SCC therefore indicates better dairy cow welfare. Payment for milk is determined by quality (fat and protein content). In addition, approximately half the dairy processors pay a premium to farmers for milk with a SCC of less than 200 000 whereas the majority of dairy processors impose a penalty to farmers whose milk SCC is above 400 000. The representative of a dairy processor indicated that a penalty already at lower SCC values (currently 300 000) is being imposed to their suppliers due to the target customers of some their products, such as infant formulas; the aim is to reach a SCC of 200 000 or less in all of its suppliers. In addition, dairy farmers have started using SCC values to decide, with the support of dairy processors and AHI, on selective dry-cow therapy for mastitis.
31. Lameness causes pain and reduced mobility in animals. All farmers met by the audit team indicated low frequencies of lameness in their herds. The farmers indicated that preventing lameness, and consequently protecting animal welfare, is very important due to the need to walk the cows daily from the pasture to the milking parlour.
32. Information on official controls on tail docking is already reported in paragraphs 17 to 24. Bord Bia is the only other actor which uses tail docking as a welfare indicator. The low frequency of this non-compliance is also supported by the negative reaction of the farmer group met by the audit team who, when asked for their opinion, immediately condemned this practice.

Conclusions on indicators of animal welfare

33. Animal-based indicators are actively being used both by the CA and the various actors to evaluate and improve the welfare of cattle on dairy farms. The CA has recently started using these indicators in its official controls. The extensive activities focus primarily on health, breeding, and sustainability which also benefit animal welfare.
34. Improving trends are perceived in the majority of welfare indicators, particularly those which are being promoted by several actors from the industry. Actions for the management of mastitis, through the control of somatic cell count in milk, are strongest since most actors are addressing this issue. Actions addressing tail-docking are weakest, as they are being addressed by only one actor other than the CA.

6 OVERALL CONCLUSIONS

The measures in place generally ensure that cattle on dairy farms are not caused unnecessary pain, suffering or injury.

The Irish national strategy for dairy farming actively involves the CA and all other actors in managing animal welfare on dairy farms including the occurrence of mastitis, lameness, reproductive and metabolic diseases and disease in calves. Common actions are being implemented by the farming community with improving trends in the majority of welfare indicators. This is particularly the case where actions are being addressed by several actors from the industry, such as the prevention of mastitis and survivability. On the other hand where actions are addressed by a limited number of actors, such as the prohibition of tail docking, awareness levels of the national legislation prohibiting tail docking are low and there is a continuing incidence, albeit low level, of non-compliance with this requirement.

7 CLOSING MEETING

A closing meeting was held on 22 February 2016 with representatives of the competent authorities, at which the main findings and preliminary conclusions of the audit were presented by the audit team.

During this meeting the CA indicated that it intends to increase efforts to reduce the non-compliance of tail docking.

8 RECOMMENDATIONS

The Competent Authorities are invited to provide, within 25 working days of receipt of the report, an action plan containing details of the actions taken and planned, including deadlines for their completion, aimed at addressing the recommendation set out below:

No.	Recommendation
1.	To raise awareness amongst all actors to avoid this mutilation and prevent causing unnecessary pain and suffering to cattle, as required by Article 3 of Directive 98/58/EC. Recommendation based on conclusions 25 and 34. Associated finding: 12, 15, 17, 24 and 32.

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

http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=2016-8760

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
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
Dir. 98/58/EC	OJ L 221, 8.8.1998, p. 23-27	Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes
Dir. 2008/119/EC	OJ L 10, 15.1.2009, p. 7-13	Council Directive 2008/119/EC of 18 December 2008 laying down minimum standards for the protection of calves
Dec. 2006/778/EC	OJ L 314, 15.11.2006, p. 39-47	2006/778/EC: Commission Decision of 14 November 2006 concerning minimum requirements for the collection of information during the inspections of production sites on which certain animals are kept for farming purposes

ANNEX 2 – PRUDENT USE OF ANTIMICROBIALS

Information was collected on measures which included any of the following points in Section 6.4 of the guidelines for the prudent use of antimicrobials in veterinary medicine (2015/C 299/04):

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

Actions being taken on the prudent use of antimicrobials are listed in Table 2 below:

ACTORS	TOOLS	DESCRIPTION	UPTAKE
AHI and Farmers	CellCheck	Selective therapy – no antimicrobials when drying cows with SCC less than 100 000	Still at initial phase
	"Colostrum 1-2-3"	Three litres of colostrum, within the first two hours of life nearest to the first suckling.	1,700 farmers trained over nine events

- The guidelines to the CellCheck programme include a decision tree helping farmers to select between blanket and selective antimicrobial treatment in cows at drying off. A representative of AHI indicated that this drive for the prudent use of antimicrobials is at an initial phase as currently an estimated two-thirds of the dairy farmers do not have sufficient data to make an informed decision;
- A representative of the ICMSA indicated that there is a drive to move away from blanket treatment with antimicrobials when carrying out dry-cow therapy. The current concept is to avoid applying intra-mammary tubes to cows with a SCC of less than 100 000 and to apply only a teat sealer. This has been confirmed to the audit team by some of the farmers met and reflects the decision tree included in the guidelines for the CellCheck programme;
- AHI has been active in promoting the Colostrum 1-2-3 concept for dairy calves through its CalfCare programme. The concept is to give three litres of colostrum as the first feed to dairy calves within the first two hours from birth to transmit the maternal antibodies protecting the calf from disease. Farmers met by the audit team frequently mentioned this concept when being interviewed;
- These two measures (selective dry-cow therapy and feeding colostrum to calves) are included in the Commission's guidelines for the prudent use of antimicrobials in veterinary medicine.