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FINAL REPORT OF AN AUDIT
CARRIED OUT IN
ESTONIA
FROM 30 MAY 2016 TO 03 JUNE 2016
IN ORDER TO
EVALUATE THE MEASURES TO ENSURE THE WELFARE OF CATTLE ON DAIRY
FARMS

Executive Summary

This audit took place in Estonia from 30 May 2016 to 3 June 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 there is no national strategy for dairy farming but a number of ongoing complementary activities from the competent authority and other actors (e.g., farm breeding, advisory and milk recording services) taken together, aim to improve productivity traits and welfare in dairy cattle including durability, occurrence of mastitis, incidence of reproductive diseases and lameness.

Official control measures in place for dairy cattle are well planned but inconsistently implemented. The increase in large farms in Estonia using sophisticated management techniques partly negates the necessity for them being subject to intensive levels of official controls. However, the lack of regular verification of the complete relevant requirements and inadequate official controls on smaller, struggling farms, which tend to rely exclusively on somatic cell counts to manage animal welfare, could lead to dairy cattle being caused avoidable pain and suffering.

The report contains recommendations to the competent authority aimed at rectifying the shortcomings identified and enhancing the implementation of control measures.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
AV	Authorised veterinarian
ELPR	Estonia Livestock Performance Recording
EU	European Union
OV	Official veterinarian
VFB	Veterinary and Food Board (<i>Veterinaar- ja Toiduamet</i>)

1 INTRODUCTION

This audit took place in Estonia from 30 May 2016 to 03 June 2016 as part of the planned audit programme of DG Health and Food Safety. An opening meeting was held with the Estonian competent authorities on 30 May 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 a national expert from the Netherlands and was accompanied throughout the audit by representatives from the Central Competent Authority the Veterinary and Food Board (VFB, *Veterinaar- ja Toiduamet*).

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;

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.

- 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);
- Involvement of advisory services such as farm advisory or private veterinary groups;
- The audit concentrated on the period 2013 – May 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);
 - 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 the DG Health and Food Safety audit will be 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;
 - d. providing bovine colostrum to each calf as soon as possible after it is born.

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

- 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.

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

Meetings		No.	Comments
Competent authority	Central	2	Opening and closing meeting
	Other	2	With officials from the district veterinary offices of Tartu and Jarva
Site visits			
Dairy farms		2	
Meetings with representatives of other main actors involved with the welfare of dairy cattle		9	<ul style="list-style-type: none"> - Ministry of Rural Affairs - Animal Breeders Association of Estonia - Estonian Farmers Association - Commercial Association of Estonian Dairy Producers - Estonian University of Life Sciences - Agricultural and Rural Economy Advisory Service - Estonian Dairy Company - Estonian Livestock Performance Recording (ELPR) - Private Veterinary Dairy Consultancy
Meeting with dairy farmers		1	Two farmers both with over 500 dairy cows

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,

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

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 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 rules.

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 could, amongst other possibilities, be through structural changes such as increased herd size, intensified land use and entrance of new producers into the sector. This could have either a negative or positive impact on the implementation of animal welfare rules – depending on how this transition is managed.

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 parties, both public and private, 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)⁴.

For the past 15 years Estonian dairy farms have undergone major intensification with a move to loose housing systems and fewer very large farms (i.e. over 1000 animals) resulting in almost a trebling of milk production. Estonia is now second only to Denmark in average volume of milk produced per milking cow. The number of dairy cows in Estonia has declined by about 14% since 2014 due to the trade embargo with Russia.

Statistical information on Estonian dairy production characteristics from 2012-2013 is available at: https://www.jkkeskus.ee/assets/tekstid/aastaraamatud/aastaraamat_2014.pdf.

⁴ 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 MAIN ACTORS INVOLVED WITH THE WELFARE OF DAIRY CATTLE

1. The organisation of the VFB is described in detail in the "Country Profile" of Estonia and which is accessible at: http://ec.europa.eu/food/audits-analysis/country_profiles/details.cfm?co_id=EE , including the control systems of relevance for animal welfare at farm (see also paragraphs 12 to 26, for details specific to dairy cattle controls).
2. The latest Estonian Rural Development Plan (ERDP) for 2014–2020 (<http://www.agri.ee/en/objectives-activities/estonian-rural-development-plan-erdp-2014-2020>) includes among its priorities the aim of raising the competitiveness of agriculture through the implementation of the plan.
3. As a result of the increased focus on competitiveness in recent years, the transition to larger farms with loose housing systems and the general nature of this legislation (see also Section 5.2), the Ministry of Rural Affairs recently commissioned the University of Life Sciences to carry out a study on dairy farms to inform future policy decisions in this sector.
4. The study was designed to identify the risk factors for the welfare of dairy cows. It aims to: identify risks, gaps in official controls and the impact of existing legislation. The study which is due to report in 2017 includes:
 - a review of the current Estonian, EU and other states' legislation in this area;
 - a welfare evaluation of selected dairy farms (of different sizes) throughout Estonia in the autumn, winter, spring and summer to ensure that risks are identified on different sized farms, with different husbandry methods, and includes any seasonal variation;
 - farmers contributions through a questionnaire;
 - proposals from the findings to the Ministry as to how can the identified risks be best ameliorated.
5. Preliminary findings from the study from eleven farms evaluated indicated that the main risks to lactating dairy cows were:
 - Feeding: Body condition was variable between farms;
 - Comfort: Cows' comfort at resting was impaired;
 - Injury: Integument alterations, swellings, hairlessness and cuts evident;
 - Stockmanship / Human-animal relationship: variability between farms with better stockmanship in summer than winter (possibly because of less time spent with the animals during winter);
 - Hoof inflammation: Would appear to be a widespread issue.

6. The Agricultural Registers and Information Board is responsible for cross compliance inspections (see also paragraph 25) and the respective direct payment and/or deductions, which include animal welfare requirements (Council Regulation (EC) No 1782/2003). It also maintains a database of all registered farms and provides updated lists of those farms to the VFB and County Veterinary services in support of their control activities.
7. The Ministry of Rural Affairs, as part of its dissemination of information and coordination activities
 - Organises at least one annual meeting with farmers to report and discuss compliance and implementation of cross compliance requirements on farms;
 - In 2016 issued a brochure on requirements for "Cross compliance and greening" that is handed out to farmers;
 - Annually in March/April has a public awareness event for farm advisors to inform them about issues or updates related to cross compliance.
8. The Estonian Animal Breeders Association informed the audit team that:
 - It includes approximately 90% of dairy and beef cattle breeders.
 - There is a nationally approved (by the VFB) five year breeding programme for the main breeds utilised in Estonia e.g. for the Estonian Holstein the objectives are to improve the economically useful characteristics.
 - The Association works in cooperation with the Estonian Livestock Performance Recording Company to provide genetic information to farmers. There is no overall "Genetic Value Index" of production features but 17 parameters such as average milk volume production, fertility, somatic cell counts, life expectancy, ease of calving, etc. Each farmer then uses that information to choose which replacement animals to keep and the genetic material they wish to purchase according to the parameters of more interest to them. The main change between the previous programme and the current one is that milk volume production is no longer given a particular weight and milk dry matter together with body conformity/longevity reproduction and milking speed are favoured instead.
9. A dairy industry representative, that collects approximately 40 to 50% of the total national milk production, informed the audit team that:
 - The aim of their work with farmers is to help farmers produce quality milk at as low a cost and as profitably as possible. The price paid for the milk is the same independently of its content in milk solids, somatic cell count or total plate count, except if the minimum EU legal parameters for these last two, are not respected and in that case there is a deduction in payment;
 - Their advisory support service is free and currently focusses on proper feeding and the correct and hygienic use of new milking equipment;

- The support also includes an on-the-spot visit by a veterinarian who reviews milk hygiene conditions. These visit used to be annual but with noted improvements in farm equipment, bedding, environment, and management, the industry concluded it could reduce the frequency to the current one of once every three years.
10. The Agricultural and Rural Economy Advisory Service is 90% EU funded and 10% funded by farmer's contributions with the advisory service provided to farmers being otherwise free. The audit team was informed that:
- Salary, travel costs of the advisors and farm visits are paid by the foundation up to a value of 3 000 euro per year per farm (and that farmers rarely reach that limit). However if there is a need to take samples for testing the farmer does have to pay for the testing;
 - The advice provided concerns both cross compliance requirements and farming practices. Examples of advice requested by dairy farmers was on: the care of calves and their housing, reducing laminitis, handling of and driving animals to the milk parlour, udder health and many requests concerning what constitutes good indoor housing conditions;
 - The advisory service did not indicate any particular animal welfare issue as being particularly prevalent or widespread. Possibly the main need would be for more frequent training (or refresher training) for staff due to more new farmers and/or bigger farms so both the animals and the new staff need to adapt.
11. A representative of ELPR, a semi-state milk recording body, informed the audit team that:
- The organisation provides laboratory, statistical and field services. There is a very high level of participation in performance recording in Estonia with 95% of dairy cattle in Estonia included. Breeding values for production, conformation, udder health, fertility, calving and longevity traits for bulls and cows in Estonia are estimated by the company three times per year;
 - All participant farmers must provide monthly milk samples which are tested for somatic cell count, milk fat, protein, and urea levels and pregnancy hormones. There is the possibility to detect bacteria in milk (4 or 16 species testing) and pregnancy testing. Staff also take milk samples from 5% of animals per year to verify herds' own sampling results;
 - Their staff carry out farm visits to explain to farmers how to correctly record performance parameters, evaluate body condition/conformity and lameness scores to feed into breeding statistics. This information is analysed for farmers and on request for the Estonian Animal Breeders Association.

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. The main national legislation on animal welfare of relevance for this audit is the Animal Protection Act of December 2000 (as amended) and Regulation No. 90 on “Requirements for Cattle keeping and indoor housing” of September 2009. In combination they include the relevant requirements of Directive 98/58/EC and of the Recommendation as well as some additional specifications (such as on: maximum sound levels, minimum light intensity levels, and minimum surface area requirements) not detailed in either Directive 98/58/EC or the Recommendation.
13. Documented procedures are available for planning and carrying out official controls on animal welfare in dairy farms, as required by Article 8 of Regulation (EC) No 882/2004. These procedures are separated into:
 - One instruction, and relevant checklists, for use by the veterinarians employed directly by the VFB at the County Veterinary Centres;
 - A different set of instruction and relevant checklists for use by authorised veterinarians (AVs) (veterinarians not directly employed by the VFB but under contract with the VFB to perform certain tasks);
 - The main difference between the instructions and checklists for County veterinarians and those for AVs is that the County veterinarians are required to check compliance with the complete cattle requirements in the national legislation (including requirements from the Recommendation) whereas AVs are required to check compliance with the requirements of Directive 98/58/EC (all species) and Directive 2008/119/EC (calves) only.
14. Official controls on animal welfare of dairy cattle are performed on a regular basis, based on risk-assessment (see also paragraphs 16 and 17):
 - by County veterinarians on the welfare of calves, in the case of farms with more than six calves;
 - by AVs for all other types of cattle, so all of both dairy and beef cattle of all ages.

Or ad-hoc, by County veterinarians:

- to follow up on reported non-compliances by the AVs who are not empowered to impose sanctions. Due to that, if sanctions are envisaged, any non-compliance with animal welfare requirements reported by an AV must be confirmed by a County veterinarian; or
 - as a consequence of complaints.
15. County veterinarians informed the audit team that the ad-hoc control focuses in principle on confirming the presence of the reported non-compliance, or the cause of the complaint. A full animal welfare control (which would use the instruction and checklists for County veterinarians that has the complete requirements for cattle instead of only those from Directives 98/58/EC and 2008/119/EC) may be done during these ad-hoc visits but usually only if additional non-compliances are noticed during the visit.
 16. The frequency of animal welfare controls is dependent upon a risk categorisation. The basis of how to assess risk comes from VFB Decree No. 10 from 2011, which is in line with the requirements of Article 3 of Regulation (EC) No 882/2004. The risk categorisation includes three levels: low – visited at least once every five years, medium – visited at least once every three years, and high – visited at least annually. The parameters taken into account for risk categorisation for animal welfare checks include: age of building or recent refurbishment, number of calves and the rearing system, previous infringements (taking into account the impact on and number of animals affected as well as for how long it lasted).
 17. The controls performed by County veterinarians are planned in line with the frequencies described above. The controls performed by the AVs include hygiene requirements in addition to animal welfare. Hygiene risk parameters are therefore also taken into account to decide the frequency of AV controls. According to hygiene parameters all dairy farms placing milk on the market are considered high risk, hence the planning for AVs envisages annual hygiene and welfare controls of every dairy farm.
 18. Evidence was provided to the audit team showing that the minimum planned frequencies of regular animal welfare control visits to dairy farms had been respected by both County and AVs, in line with the requirements of Article 3 of Regulation (EC) No 882/2004.
 19. The number of animal welfare non-compliances in dairy farms reported by the AVs and County veterinarians is low: out of 2006 controls in 2013 and 1487 controls in 2013 in cattle farms (dairy and beef cattle) there were respectively 51 (2.5%) and 30 (2%) animal welfare non-compliances reported. Additionally, in the two Counties visited there were almost no complaints related to animal welfare issues in dairy farms within the last three years. Since the regular controls of dairy cattle other than calves are carried out by the AVs and their instructions and checklists do not include the complete cattle requirements (see also paragraph 13), there is no regular verification of compliance with

those complete requirements in dairy cattle, other than calves, except in exceptional circumstances.

20. The audit team visited two farms. AVs and County veterinarians explained what information they gathered about the farm prior to the visit and how they performed their animal welfare controls:

- In both cases the information gathered in advance concerned mainly: the results of prior inspections, number of animals present and possible milk collection suspensions due to milk quality issues (high somatic cell count or total plate count). Gathering advance data concerning mortality was not given particular relevance, and was considered difficult to obtain as the main database used for controls (the farm registration database) does not include mortality data;
- Official control activities during farm visits include verification of records of treatment and mortality amongst others;
- Both authorised and County veterinarians would inspect the facilities and the animals (AVs looking at all animals and County veterinarians focusing on calves) verifying compliance with requirements and condition of the animals. Some of the points indicated as being checked were: environmental conditions (such as noise and light levels, ventilation), availability of feed and water, bedding, colostrum provided to calves, size of individual stalls, condition and maintenance of the cattle housing, quality of the pasture. Some animal based parameters assessed were: condition, if animals were dry and clean, calm and ruminating, the condition of hooves and udder, and if the animals were moving well;
- The instructions and checklist for animal welfare controls indicate how frequently hooves should be checked but do not indicate how to assess (or provide possible reference guidance to use for assessing) herd lameness and body condition.

21. Both farms visited by the audit team had been inspected recently without any non-compliances being reported. One farm had less than 50 cattle in total (dairy cows, calves and heifers), kept tethered when indoors but grazing at pasture at the time of the visit, and produced milk exclusively for direct sale. The other had over 1000 dairy cows kept in loose housing conditions:

- In the smaller farm the cattle stalls were too short for the length of the animals present but, although both the AV and the County veterinarian agreed with this assessment, neither the County veterinarian nor the AV had reported it as a non-compliance nor required in writing any actions to rectify the problems (which is not in line with the requirements of Article 9 and 54 of Regulation (EC) No 882/2004). This was because the farmer was aware of the issue and had a refurbishing project that was supposed to address it for at least some of the animals but nevertheless had not yet done so at the time of this visit. Bedding was present in the stalls and the audit team noted that the animals did not show significant lesions on their hind legs that would indicate inadequate welfare due to the shortness of the stalls.

- In the larger farm the housing facilities were in line with requirements, and the cattle showed no signs of inadequate welfare other than some indications of mild lameness. Farm management informed the audit team that lameness was indeed an issue as there was a relatively high incidence of digital dermatitis which they had been addressing (and managing to decrease the trend) but had until now been unable to fully control.
22. AVs and County veterinarians performed the following number of animal welfare inspections, for the purposes of Commission Decision 2006/778/EC:
- 2006 animal welfare controls on cattle farms (dairy or beef) in 2013 and 1487 in 2014 with, respectively, 1968 (98%) and 1464 (98%) farms reported as without any non-compliance. In 2013 these controls reported "Record keeping" as being the most frequent non-compliance, 21 out of a total of 51, while for 2014 "Buildings and accommodation" non-compliances were the most frequent, with 9 out of a total of 30 detected;
 - There were 164 inspections on conditions for rearing calves performed in 2013 and 186 in 2014 with, respectively, 152 (92.6%) and 179 (96.2%) farms reported as without any non-compliance. In 2013 these controls reported "Buildings and accommodation" and "Freedom of movement" as being the most frequent non-compliance, 8 and 7 respectively from 20 in total, while for 2014 "Freedom of movement" and "Record keeping" non-compliances were the most frequent, 4 each from 12 in total.
23. Data provided by the Agricultural Registers and Information Board indicated that out of 1423 cross compliance checks (performed by four official specialist staff) on cattle farms (dairy and beef) in 2014, and 1479 checks in 2015, respectively 21 (1.5%) and 27 (1.8%) had animal welfare non-compliances. The most frequent non-compliances in 2014 concerned lack of access for animals to shelter (62% of the reported non-compliances) followed by tethering of calves (24%). In 2015 these two remained the most frequent non-compliances but with tethering of calves being now the main one (55% of the reported non-compliances) followed by lack of access to shelter (22%).

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

24. Official control measures in place for dairy cattle and calves are well planned but inconsistently implemented. Checklists and instructions for official controls on animal welfare cover the relevant issues for both cows and calves and the frequency of official controls is good. However, the system in place does not ensure that checks on dairy cows take into account all the relevant requirements, and identified non-compliances are not always reported as such and effectively followed up.

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

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

Indicators	WHO uses them?	HOW are they being used?	What are the TRENDS?
Related to MASTITIS Somatic cell count	VFB Animal Breeders Association of Estonia ELPR Farmers (large and small farms) Dairy processors Agricultural and Rural Economy Advisory Service	Official controls Genetic selection Genetic selection Penalties Training/Advice	National level data reported since 1998; trend is reducing. Figures for 2012- 2013 show an approximately a 3% reduction for the year, the best farms now operate at levels of <100,000 cells/ml.
Related to LAMENESS	VFB Animal Breeders Association of Estonia ELPR Farmers (large and small farms) Consultants Agricultural and Rural Economy Advisory Service	Official controls Genetics Performance recording/relation with metabolic diseases Condition of hooves Conformation of legs and hooves Training	National level data not fully available yet- only possible to enter one cause of culling in ELPR reports

Related to REPRODUCTIVE diseases/issues	Animal Breeders Association of Estonia Large farms ELPR Agricultural and Rural Economy Advisory Service	Non-return rates Genetic selection (indirectly through their impact on fertility)	National level data reported since 1998 on returns to service, but trends not available.
Related to METABOLIC diseases	Farmers Estonian Breeders and Dairy Farmers ELPR	Body condition Research Research/development	National level data not available

26. The representative of a private veterinary service and consultancy business covering approximately 60 dairy farms (with an average of 300-400 animals) informed the audit team that:

- Skin injuries are quite frequent due to poor buildings, calf problems are also quite frequent because people dealing with them do not have enough time to care for them properly;
- Lameness is something that farmers do not pay too much attention to. Body condition is something that they are quite aware of because it is discussed in Agriculture School and they can see an easy link between body condition and metabolic diseases/culling and therefore losses.
- The most common welfare issues are reproduction (animals not becoming pregnant at 1st insemination) and mastitis. Lameness is quite often an issue detected by the consultants but is often not recognised as an issue by farmers.

27. The large farm visited did weekly lameness scoring and hoof maintenance three times per lactation but informed the audit team that farm lameness scoring was not a widespread practice on other large farms. In their particular situation this was an important measure because the farm had a longstanding problem with digital dermatitis. Other than normal replacement of animals, lameness was their main reason for culling animals.

Conclusions on indicators of animal welfare

28. Production indicators, with both direct and indirect animal welfare impact, are being routinely collected and form the basis of database parameters that are utilised by breeding programmes. The larger dairy farms are also utilising some animal based indicators in routine herd management. Smaller farms are more likely to rely exclusively on somatic cell counts to direct management/welfare interventions.

6 OVERALL CONCLUSIONS

There is no specific national welfare strategy for dairy farming but a number of ongoing complementary activities from the CA and other actors such as: farm breeding, advisory and milk recording services, which taken together aim to improve productivity traits and welfare in dairy cattle including longevity, occurrence of mastitis, incidence of reproductive diseases and lameness.

Official control measures in place for dairy cattle are well planned but inconsistently implemented. The increase in large farms in Estonia using sophisticated management techniques partly negates the necessity for them being subject to intensive levels of official controls. However, the lack of regular verification of the complete relevant requirements and inadequate official controls on smaller, struggling farms, which tend to rely exclusively on somatic cell counts to manage animal welfare, could lead to dairy cattle being caused avoidable pain and suffering.

7 CLOSING MEETING

A closing meeting was held on 3 June 2016 with representatives of the competent authorities, at which the main findings and preliminary conclusions of the audit were presented by the audit team.

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.	The competent authority should take measures to ensure that official controls on dairy farms are consistently carried out in compliance with the requirements of Articles 9 and 54 of Council Regulation (EC) No 882/2004. Recommendation based upon conclusion 24. Associated finding: 21, first bullet point.
2.	The CA should ensure that the system for regular official controls on the welfare of dairy cows includes also verification of the requirements of the Council of Europe recommendation concerning cattle that support the requirements of Directive 98/58/EC. Recommendation based upon conclusion 24. Associated findings: 14, 15 and 19.

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=2016-8763

ANNEX 1 – LEGAL REFERENCES

Legal Reference	Official Journal	Title
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
Reg. 1782/2003	OJ L 270, 21.10.2003, p. 1-69	Council Regulation (EC) No 1782/2003 of 29 September 2003 establishing common rules for direct support schemes under the common agricultural policy and establishing certain support schemes for farmers and amending Regulations (EEC) No 2019/93, (EC) No 1452/2001, (EC) No 1453/2001, (EC) No 1454/2001, (EC) 1868/94, (EC) No 1251/1999, (EC) No 1254/1999, (EC) No 1673/2000, (EEC) No 2358/71 and (EC) No 2529/2001
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
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
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

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/C299/04):

- 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.

The Ministry of Rural Affairs established a working group on antibiotics in 2015 which aimed to review the use of antibiotics, develop a common database of antibiotic usage and the species receiving them. An interim report on its findings is being drafted.

It has drafted guidance for veterinarians/farmers on the prudent use of antibiotics (available on Ministry websites (Rural Affairs and Environment)) and organised training on this for veterinarians and farmers with the Pharmaceutical Board of the Ministry of Home Affairs.

This subject has also been regularly included in the agenda of the annual conference Healthy Animal Healthy Food aimed at dairy processors, veterinarians, farmers and slaughterhouse operators. Training for practitioners, AVs and County specialists on prudent use of antibiotics has also been given by the Estonian University of Life Sciences which includes this as part of the training for veterinary students and has a number of research projects in this area.

The regular treatment of whole herds with routine intramammary dry cow antibiotic therapy is said to be still very prevalent but there is a slow movement away from this. However, mastitis intervention therapies for milking cows based upon pathogen detection and the use of basic penicillin were being utilised successfully. Farmers, private practitioners and official services were aware of the issue of antimicrobial resistance and recent national initiatives to raise awareness.