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Directorate D - Food and Veterinary Office

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REPORT OF A MISSION  
CARRIED OUT IN THE UNITED KINGDOM  
FROM 28 FEBRUARY TO 3 MARCH 2000  
CONCERNING THE WELFARE OF PIGS AND CALVES ON FARM

*Please note that certain comments, made by the UK authorities on 26 May 2000 in response to the draft report, have been included in the text of this final report in bold, italic type or as a footnote.*



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## LIST OF ACRONYMS

AHDO	Animal Health Divisional Office
AHO	Animal Health Officer
DVM	Divisional Veterinary Manager
EEC	European Economic Community
EC	European Community
FVO	Food and Veterinary Office
HQ	Headquarters
MAFF	The Ministry of Agriculture, Fisheries and Food
NI	Northern Ireland
SVS	State Veterinary Service
UK	United Kingdom of Great Britain and Northern Ireland
VIPER	Veterinary Instructions, Procedures and Emergency Routines
VO	Veterinary Officer

## 1. INTRODUCTION

The mission took place in The United Kingdom from 28 February to 3 March 2000. The Commission team comprised 2 veterinary experts from the Food and Veterinary Office (FVO) and 1 Member State expert.

This mission was undertaken as part of the FVO's planned mission programme.

The mission team was accompanied during the entire mission by 2 representatives from the Ministry of Agriculture Fisheries and Food - the Central Competent Authority.

An opening meeting was held on 28 February and was attended by the mission team and representatives of the Competent Authority. At this meeting, the objectives of the mission and the itinerary for the mission were discussed.

## 2. OBJECTIVES OF THE MISSION

The objective of the mission was to verify how the competent authority implement and enforce the minimum standards of animal welfare for calves and pigs as laid down by Council Directives 91/629/EEC and 91/630/EEC respectively. In pursuit of these objectives the following visits were carried out:

COMPETENT AUTHORITY VISITS			Comments
Competent Authority	Central	2	Opening meeting held in an Animal Health Divisional Office (AHDO) with representatives from both the central competent authority and staff from AHDO. A closing meeting held in the headquarters of the central competent authority.
	Local	4	The AHDOs visited were those where the staff responsible for the on farm inspections were based. Files of previous inspections were made available to the Commission team.

LIVE ANIMAL CONTROL SITES			Comments
Farms		8	4 pig holdings and 4 calf holdings.
Livestock markets		1	Although not in the scope of this mission, a brief visit was made to one of the busiest livestock markets in the UK

### **3. LEGAL BASIS**

The mission was carried out under the general provisions of Community legislation and, in particular:

Commission Decision 98/139/EC of 4 February 1998 laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in the Member States.

Article 9 of Council Directive 91/629/EEC of 19 November 1991 laying down the minimum standards for the protection of calves.

Article 9 of Council Directive 91/630/EEC of 19 November 1991 laying down minimum standards for the protection of pigs.

In addition certain aspects of the following legislation were relevant to the performance of this mission:

Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes,

Commission Decision 2000/50/EC of 17th December 1999 concerning minimum requirements for the inspection of holdings on which animals are kept for farming purposes, and

Council Directive 91/628/EEC of 11 November 1991 on the protection of animals during transport.

### **4. BACKGROUND**

#### **4.1 The pig sector**

The United Kingdom is the 7th largest pig producer in the European Union. There are currently 40,322 registered pig holdings in the UK, with an average of 556 animals per farm. The visits to the pig holdings took place in regions with intensive pig rearing. In addition approximately 20% of holdings in the UK keep sows outdoors and this type of production was seen during the mission.

#### **4.2 The calf sector**

There are currently 85,781 holdings with calves in the UK, with an average of 17 calves per farm. The calf holdings visited were in areas with significant cattle rearing, with more than 800,000 cattle in each AHDO area. Rearing calves in the conventional type veal crate was banned in the UK in 1981 and veal production is a minor feature of the livestock sector in the UK.

## 5. MAIN FINDINGS

### 5.1 Applicable legislation in The United Kingdom

Council Directive 91/629/EEC (as amended by Council Directive 97/2/EC, and by Commission Decision 97/182/EC) and Council Directive 91/630/EEC are implemented in Great Britain by the Welfare of Livestock Regulations 1994. Schedule 2 of these regulations provides the specific requirements for calves and schedule 3 for pigs. The Welfare of Livestock Regulations 1994 was made under the powers provided by the Agriculture (Miscellaneous Provisions) Act 1968. In addition, the subsequent amendments to Directive 91/629/EEC were implemented by the Welfare of Livestock (Amendment) Regulations 1998.

Different legislation applies in Northern Ireland. Council Directives 91/629/EEC and 91/630/EEC were enacted there by the Welfare of Livestock Regulations (NI) 1995, as amended by the Welfare of Livestock (Amendment) Regulations (NI) 1998.

A comprehensive check of the above legislation was not carried out. However, several requirements, which go beyond the requirements of the Directives, were noted.

- From 1 January 1999 all sows, with the exception of those in farrowing crates, must be able to turn around without difficulty, the dry sow stall or tether system having been phased out over an 8 year period.
- The space allowances for the group rearing of calves are in excess of those given in Council Directive 91/629/EEC.
- Farmers are obliged to have a copy of the relevant code of recommendations for the welfare of livestock issued by The Ministry Of Agriculture, Fisheries and Food (MAFF) and to be aware of its contents and make it accessible to all staff working with animals. Failure to comply with the code is not an offence in itself, but can be used as supporting evidence where a breach of legislation occurs. These codes are unique to the UK and set out general recommendations for the keeping of livestock and also refer to specific legal requirements. At the time of their publication, these Codes were signed by the Minister for Agriculture. It was reported that a parliamentary procedure had to be followed when these Codes are revised. *A publicity initiative is usually timed to coincide with the publication of a revised Code.*

### 5.2 Competent authority

MAFF's State Veterinary Service (SVS) has responsibility for carrying out welfare inspections of calves and pigs on agricultural holdings in England, and on behalf of the devolved administrations in Scotland and Wales. In Northern Ireland the competent authority is the Department of Agriculture and Rural Development (DARD), while the implementation of the policy in the field is the responsibility of

the Veterinary Service. As this mission took place in England and Scotland, the findings refer to information received from MAFF's SVS and facts found during visits to Animal Health Divisional Offices (AHDO) and during inspections carried out by Veterinary Officers (VOs) of the State Veterinary Service.

### **5.2.1 State Veterinary Service in England and Scotland**

The regional and divisional structure of the State Veterinary Service (SVS) consists in England of 3 administrative regions (North, East and West) while Scotland is considered as 1 administrative region, each region has a Head of Veterinary Services.<sup>1</sup> Scotland acts as "Lead region" in relation to animal welfare, this implies that the Head of Veterinary Services in this region advises HQ on items such as development of policy and enforcement. This system of "lead region" in animal welfare has been operating for five years, and is meant to ensure that there is feedback of information from farm level to HQ. The fieldwork in each region is administered from 5 Animal Health Divisional Offices (AHDO). Each AHDO is managed by a *Divisional* Veterinary Manager (DVM) who has a staff of some 6 to 10 Veterinary Officers (VOs), 4 to 6 Animal Health Officers (AHOs) and administrative support. In each AHDO visited a Veterinary Officer was responsible as "lead VO" in animal welfare. The lead VO advises colleagues in relation to changes to animal welfare legislation and administrative procedures and together with the DVM oversees the implementation of welfare checks at the office level. A lead VO in animal welfare may also take a lead role in several other areas of work.

### **5.2.2 Operational procedures**

#### *5.2.2.1 Information to farmers*

Farmers are informed through press articles and advisory material. In the UK the codes of recommendations for the welfare of livestock (see point 5.1.3.) includes one for pigs published in 1983 and reprinted in February 1998 and one for cattle published in 1983 and reprinted in July 1998. These have been issued to every farmer who keeps these species. The code for pigs sets out a space requirement for lying area only, excluding dunging and exercise areas and it does not contain the specific requirements for unobstructed floor space laid down in article 3 of Council Directive 91/630/EEC. However, Pig Space Requirements (guidelines on Schedule 3 of the Welfare of Livestock Regulations 1994) were published in 1997, which refer to the figures in the Directive and these were issued to every registered pig producer. These guidelines interpret requirements of UK legislation such as the dry sow's ability to turn around without difficulty. They also explain to the farmer that where there is an infringement of the legislative requirement for space allowances for growing pigs different enforcement action will be taken depending on the extent of overstocking (see graph in point 5.3.1.1).

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<sup>1</sup> In their comments of 26<sup>th</sup> May the UK authorities emphasised the fact that the SVS operates in England, Scotland and Wales and that Wales has three AHDOs.

There is also a policy to provide advice and help to all livestock producers on an ad hoc basis, which involves organising meetings in areas of the country where a particular issue may need to be addressed.

In addition to animal welfare checks by the SVS, it was reported that the majority of pig farms are subjected to checks every three months for the purposes of belonging to certain retailing schemes. ***Checks for the Farm Assured British Pigs Scheme were, until recently, carried out every two years by VOs from the SVS*** and involved aspects of pig production in addition to animal welfare. It was reported that these visits increased the level of compliance on issues of animal welfare.

#### *5.2.2.2 Staff instructions*

In Great Britain the SVS issues instructions to field staff regarding on farm inspections in its Field Service Manual. Chapter 32 of this manual deals with animal welfare on farm, and the manual is available both on paper and through VIPER, which stands for Veterinary Instructions, Procedures and Emergency Routines and is an intranet based system of instructions for veterinary staff. All VOs have access to a PC and are alerted when logging on to the intranet to amendments by a system of information notes (“Latest news”). The DVMs are also alerted directly by E-mail.

#### *5.2.2.3 Categories of inspection*

Animal welfare inspections of calf and pig holdings are divided into the following categories: random, routine, complaint, targeted, and follow-up.

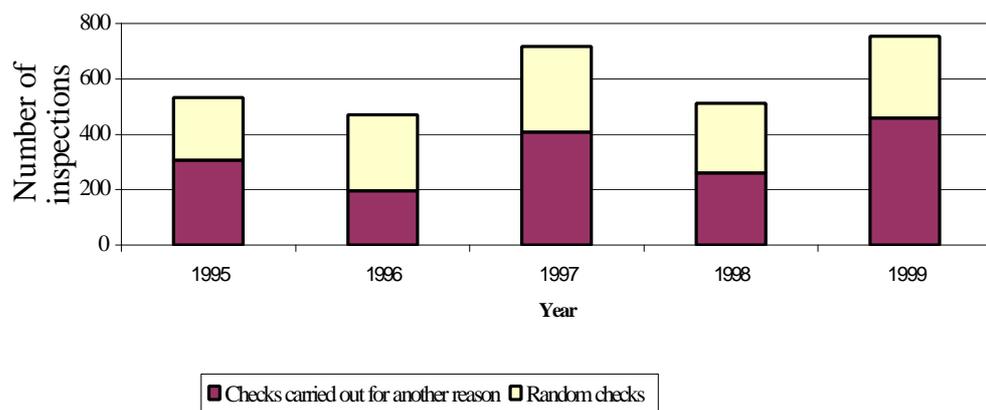
Random inspections are those carried out in order to fulfil the requirements of article 7 of Council Directive 91/629/EEC and Council Directive 91/630/EEC. The aim is to achieve at least 147 inspections of calf holdings and 147 inspections of pig holdings each year. This target figure is based on a statistical model which was developed for livestock disease surveys, and which will give a 95% certainty of including at least one positive if disease is present at a level of 2%. The number of inspections allocated to each region is weighted on the basis of the relative importance of each sector in the region. The Heads of Veterinary Services then advise the DVMs on the number of visits to be carried out by each AHDO. The SVS Field Service Manual states that “the DVM must use available records and local knowledge to randomly select the appropriate number of holdings in each category from those in the Division.” However in AHDOs visited the method of selection varied. In 3 AHDOs farms were generally selected on a random basis either using a computer based register or using the principle “stick a pin in a register”, whereas in a fourth AHDO the selection was mainly based on local knowledge.

Complaints concerning animal welfare conditions on a farm will initiate an inspection and one of MAFF’s key service standards is to react promptly to all

complaints so that all farms are visited within 24 hours. It was reported in the AHDOs visited that a complaint may come from members of the public, animal welfare associations, a veterinary surgeon, other MAFF staff or staff employed by the Local Authorities. In several of the offices visited the animal welfare associations referred all complaints directly to the AHDO, the inspection was then carried out by the SVS and it was a policy not to carry out the checks jointly with an inspector from an animal welfare association. The method of inspection carried out in response to a complaint was not seen during the mission, but in the reports of such inspections seen by the Commission team the focus of the visit was to ascertain if there was any evidence of unnecessary pain or distress.

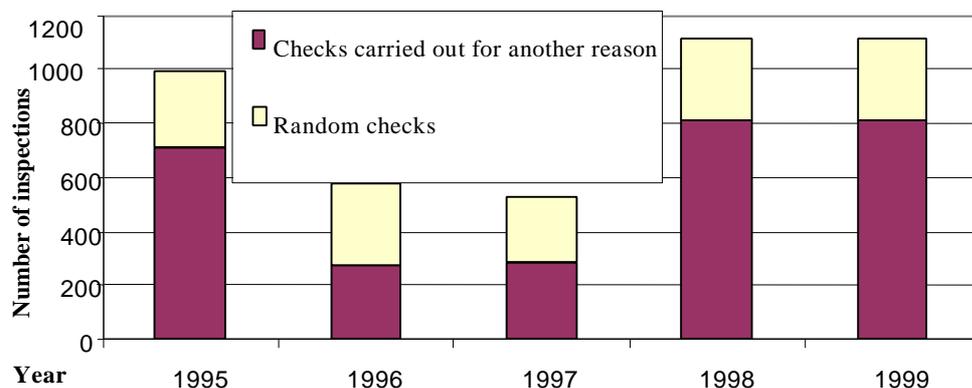
The number of checks carried out in the UK involving calves and pigs are shown in the following graphs.

**Number of checks of holdings with calves**



This approximately represents between 0.5% and 0.9% of holdings with calves in 1996 and 1999 respectively. Although the number of inspections will also include revisits to the same holding, the number of inspections of pig holdings approximately represents between 1.3% in 1997 and 2.7% in 1999 of all holdings in the UK with pigs.

**Numbers of checks of pig holdings**



#### *5.2.2.4 Results of inspections carried out in the UK*

Following any inspection a “Farm Animal Welfare Inspection Report” is completed, and the data entered on the VETNET system. The VETNET is a computer based farm file system which contains a variety of data, including a herd and flock register, information on diseases and a welfare reporting framework. It has a set of screens, which may be used for recording all animal welfare inspections on farm, at market, during transport and at slaughter. The screens correspond to the format of the Animal Welfare Inspection Report. The system has been updated from 1 January 2000 in order to computerise results from animal welfare inspections and will be used to implement the requirements of Commission Decision 2000/50/EC.

The type of inspection has been categorised as described in point 5.2.2.3 and welfare assessments are recorded under a number of “welfare issues”, which correspond to those in the table of the annex of Commission Decision 2000/50/EC. Levels of compliance is referred to using letters A to D where A is full compliance with both legislation and welfare codes and D is unnecessary suffering. The different enforcement actions have also been coded. Reports are entered directly onto the VETNET system. The previous system on VETNET only allowed the central authority to tell how many inspections had been carried out and how many non-compliances had been detected and the resultant enforcement action taken. In 1998 the percentage of random inspections which detected a non-compliance was 2% of pig inspections and 4% of calf inspections, whereas the comparative figures for inspections following a complaint were 25% and 32% respectively. Those veterinary officials met during the mission considered random visits a less efficient use of resources for improving standards of animal welfare compared to targeted checks.

#### *5.2.2.5 Results of inspections and prosecutions initiated in the AHDOs visited*

According to information received in the AHDOs visited, the most common violations on pig farms in the last 12 months concerned varying degrees of failure to provide appropriate care. This type of offence also occurred on holdings with calves, but on these holdings the majority of non-compliances had less severe consequences for animal welfare. Previous files revealed that prosecutions were initiated by the SVS when a gross abuse of animal welfare was detected or where a deficiency had not been rectified after advice had been given and repeated visits made. Prosecutions are normally co-ordinated by the legal services of the local authority who are autonomous from MAFF and of which there were several in each AHDO area. MAFF also have their own investigation branch but it was reported that as the majority of welfare cases usually arise without prior warning and require urgent evidence gathering that the arrangement with the local authorities works more efficiently. In Scotland prosecutions are co-ordinated by the offices of the Procurator Fiscal, who will examine the case prepared by the SVS again usually in co-operation with the local authority. In one of the AHDOs visited, a file revealed that legal

sanctions had been initiated against a farmer who had failed to comply with the ban on dry sow stalls. These sanctions had been initiated after repeated visits failed to achieve compliance and unfit animals, which had not received appropriate care, had been found at one of the visits. The type of sanctions imposed by the Courts in the previous 12 months for other offences were mainly fines, but in two cases the farmer concerned had been banned from keeping animals.

### **5.3 Field visits carried out by the Commission team**

#### **5.3.1 Inspections of Pig holdings**

The Commission team observed the inspection procedures carried out by SVS officials on four different pig holdings. Each inspection was carried out by one of three VOs, and the farms were located in 2 different AHDOs.

The types of holdings visited included outdoor systems, systems where pigs were accommodated on straw and systems where pigs were kept on slatted floors.

The VOs followed a similar system of inspection, with an initial meeting to look at farm records, a checklist was used as an aide memoire and the conclusions were presented to the farmer. It was later explained that the reason for the detailed checking of the labelling of medicines in the initial farm record check was due to enforcement activity by the SVS on this issue.

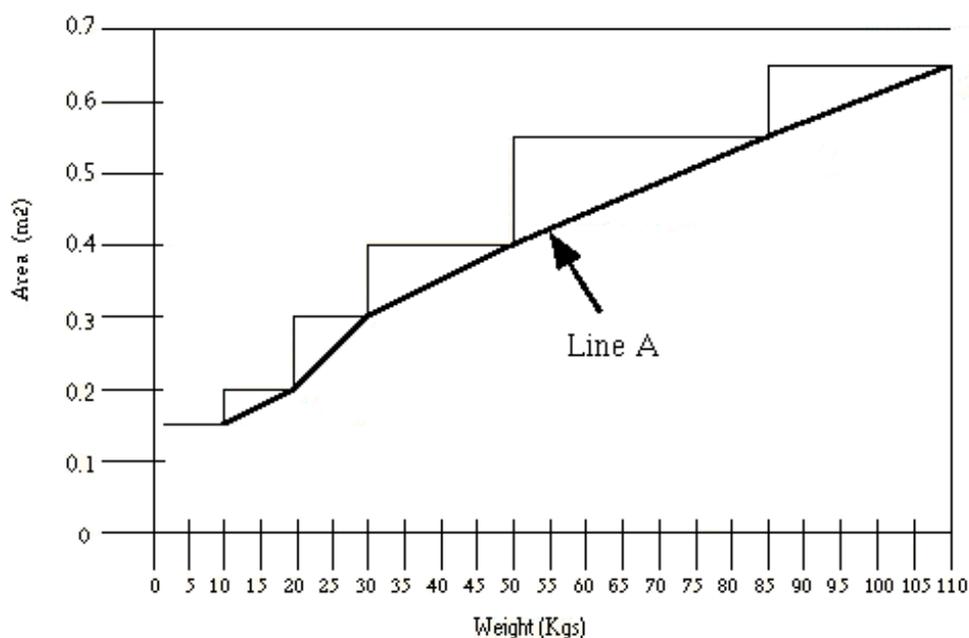
##### *5.3.1.1 Space allowances*

Staff instructions (Chapter 32 of the Field Service Manual) refer to the guidelines issued to every pig farmer in 1997 (see point 5.2.2.1.) which should be considered when assessing whether or not space requirements have been met.

Dry sows were accommodated in a variety of ways on the various farms visited. These varied from arks located in outdoor paddocks to straw bedded yards to converted sow stall systems. The latter system, where the back of the existing stalls had been removed and a shared pen created at the back of the stalls, is known as free access stalls. In this particular conversion, a pillar was occasionally positioned close to the back of a stall, however the VO concluded that each pig could back out of its stall into a shared area without difficulty.

On one farm the VO concluded that space requirements for rearing and growing pigs was marginal but no unnecessary pain or distress was observed and this was recorded in the written inspection report and a revisit scheduled for 3 months time. On another farm the stocking density calculated by the VO for several pens provided an unobstructed floor area for each pig which was less than required by paragraph 1 of Article 3 of Council Directive 91/630/EEC (e.g. 0.26m<sup>2</sup> for pigs of approximately 25kg). The staff instruction refers to

three publications which provide information on space allowances for pigs. These are the Welfare of Livestock Regulations 1994, the Code of recommendations for the welfare of pigs and the guidelines on Schedule 3 of the Welfare of Livestock Regulations 1994 (see point 5.2.2.1). The latter includes the graph<sup>2</sup> below, where the minimum unobstructed floor area available to each growing pig as required by the Directive is represented by a series of steps. A stocking density, which falls on or above these steps, is in compliance with the legislation. The guidelines explain that where the stocking density is not in compliance, the type of enforcement action will differ depending on which side of line A the stocking density lies. The guidelines state that immediate enforcement action will be taken if a finishing system falls below line A but that “the situation will be discussed with the producer who will be required to produce an action plan” if the stocking densities calculated fall between line A and the step. The stocking densities calculated on this particular farm fell into the latter category, however the VO concluded that there was sufficient space.



### 5.3.1.2. Surgical mutilations

It was reported that tail docking of piglets is still carried out on 80% of pig farms in the UK. Almost one page of the staff instruction addresses tail

<sup>2</sup> In their comments of 26<sup>th</sup> May the UK authorities pointed out that the space allowances for pigs set by Council Directive 91/630/EEC cause difficulty for UK producers because their systems do not normally require pigs to be moved at the weights used to specify the space allowances in the Directive. Paragraph 4.4.6 of the Scientific Veterinary Committee Report on the Welfare of Intensively Kept Pigs 1997, explains the logic of using a formula to calculate space allowances

docking of piglets and on the farms where tail docking was practised the VOs sought assurances that there was evidence for the necessity of this practice. In most cases a letter from the practising vet was available justifying the continued docking of piglets. On the farms where this practice was carried out it was also reported that tail biting incidents occurred when the practice was suspended. On one farm visited, where the overall policy on the farm was to tail dock pigs, the majority of pigs were reared in a slatted house system. However, the stockman reported that if he was sure that the piglets were going to be raised through a straw bedded system also available on the farm then the piglets would not be docked.

On the farm which had several pens of overstocked pigs it was reported that there was a problem with tail biting despite the fact that these pigs had already been tail docked. Several tail bitten pigs had already been removed to straw-bedded hospital pens. The VO discussed aspects of environmental enrichment and ventilation with the farmer and made it a priority to visit the hospital pens, but as mentioned in 5.3.1.1 did not conclude that the pens were overstocked.

#### *5.3.1.3. Unfit and injured animals*

Some of the recently weaned sows seen on one farm were in a thin condition and several sows in both farrowing crates and dry sow pens had skin injuries. All were receiving appropriate care. Pigs with more serious injuries, including a sow with hind leg paresis and the tail bitten pigs described in 5.3.1.2. were accommodated in bedded hospital pens. One farmer, with a group housing system for sows using electronic feeders, discussed with the VO a problem where a few sows had broken their legs while in this system. The only injuries seen in the dry sows during the visit were some skin injuries and the VO discussed in particular a vulval-biting problem.

#### *5.3.1.4. Alarms*

On two of the farms visited several buildings, where the pigs depended on automatic ventilation, did not have a functioning alarm to indicate a failure of the system. The farmers were aware of this deficiency and the inspecting VOs advised that this would have to be rectified and a revisit was scheduled. In addition it was drawn to one farmer's attention that he was required to test the functioning of the alarm weekly. The requirement of Council Directive 91/630/EEC that alarm systems should be tested "Regularly", is interpreted as weekly in UK legislation.

#### *5.3.1.5. Written reports of inspections*

These reports on which these findings were made were sent to the Food and Veterinary Office after the mission had been completed.

A written “Farm animal welfare inspection report” was made by the inspecting VO for each farm visited. Where the minimum standards of animal welfare have been met, each welfare issue is further categorised in the report on the basis of whether only legislative requirements were met (B) or whether in addition requirements of the code have been met (A). However, on the issue “freedom of movement” the code does not add anything additional to the legal minimum requirements and an “A” is awarded in every case when this minimum requirement is met.

In three out of the four inspection reports the written comments corresponded to the comments made to the farmers on the spot and where non-compliances had been detected these were awarded a C in the relevant category. However, in one case there was a failure to record several issues which were discussed on the spot. The farm was incorrectly assessed as having achieved all the requirements of both the legislation and the welfare code in relation to all animal welfare issues and no further visit was scheduled.

The style of the written reports differed in that in some of the reports any issues considered less than A were linked to a written comment, whereas in other reports the reader has to make this association.

### **5.3.2 Inspections of Calf holdings**

Three VOs individually inspected four calf holdings, which were located in two different AHDO areas. None of the farms visited had been renovated in the last two years, although initial information supplied indicated that one of the holdings had been updated in the last eighteen months. Attempts to find farms which would have to more fully meet the requirements of the Directive proved unsuccessful (see introduction) and it was reported that even the calf accommodation in an agricultural college in one of the divisions had not been renovated since 1984.

The majority of VOs used a form of checklist which listed the legal requirements as well as those of the code of recommendations. VOs met emphasised to the farmer the importance of being familiar with the code and having a copy of the code available. However, the code for cattle has not been updated since 1983 and many of the specific requirements of the Directive are not included, providing only general guidance on issues such as stocking density. It was also explained that normally an inspection of all categories of stock would have been carried out at a welfare visit, but that as the scope of the mission only covered bovine animals up to six months of age the inspection would only include the calf rearing accommodation.

#### *5.3.2.1. Accommodation for calves*

On the farms visited, small numbers of homebred calves were housed, with young calves kept in either small groups or in individual boxes, and older

calves kept in larger groups. All calves were bedded on straw. The stocking densities were all in compliance with the requirements of UK legislation. It was reported that in some regions of the UK older calves would also be accommodated on slatted floors. However, these systems were not present on any of the farms visited.

- On one farm the VO concluded on the spot that calves, which were in individual boxes and which were more than eight weeks old, should have been group housed. However, this accommodation dated from 1980 and the requirement of UK legislation is for group housing only for accommodation in operation from 1998. This legislative requirement was pointed out by the Commission team.
- Although the requirement for perforated walls did not apply to any of the holdings visited this was discussed with the farmers who kept calves in individual boxes. On one farm the type of boxes used had perforated walls, which allowed each calf to have direct visual and tactile contact with its neighbour. These had been reportedly used for thirty years without a disease problem, however the VO expressed his reservations about the provision of perforated walls for young calves. Apart from this farmer who had experience of operating such a system, the other farmers and VOs, who expressed an opinion, did not support the requirement for calf pens to have perforated walls.

#### *5.3.2.2. Surgical mutilations*

The staff instructions clearly sets out the UK legislation on routine on-farm operations and the manner in which these may be carried out. VOs discussed issues such as removal of supernumerary teats, dehorning and castration. All farmers were familiar with and claimed to carry out these procedures in compliance with the requirements of UK legislation. Supernumerary teat removal was not practised on all farms and it was reported that castration of male calves was practised on half of the farms visited. It was reported that this was carried out by a veterinary surgeon using a surgical method. Intact bull calves were reared on one of the farms visited and several farmers explained that they employed the services of a licensed slaughterman to humanely destroy male dairy bred calves shortly after birth due to the poor economic value of these calves.

#### *5.3.2.3. Written reports of inspections*

These reports on which these findings were made were sent to the Food and Veterinary Office after the mission had been completed.

The written conclusions of one of the reports adopted the legal position pointed out by the Commission team rather than the verbal opinion given on the spot (see point 5.3.2.1.1).

#### **5.4 Visit to Livestock market**

Although not included in the scope of this mission the Commission team were invited to visit one of the busiest livestock markets in the UK. This could accommodate up to 2000 cattle with overnight lairage facilities for 300 cattle. On the day of the visit 80 bulls 50 stores and 200 cows were sold. A member of the market staff was introduced to the commission team as the animal welfare officer and he explained his responsibilities for ensuring that animals received appropriate care. He reported that it was rare for an unfit animal to arrive on the premises due to enforcement action in the past, but in the event of an animal getting injured he would arrange that a private vet was called in and that the animal was dealt with rapidly. The commission team were shown around the facilities by one of the auctioneers and a market foreman. All the cattle in the overnight lairage had access to feed and water. Some young bulls in one pen were horned and some polled. The Commission team did not see any animals being transported.

## **6. CONCLUSIONS**

### **6.1 UK legislation**

Requirements of UK legislation go beyond the requirements of the Directives in several areas. The most significant recent development has been the banning of the dry sow stall, which had been implemented on all farms visited. In a case of non-compliance there was evidence that legal sanctions had been initiated indicating that this requirement is being enforced (see point 5.2.2.5).

### **6.2 Operation of checks**

Animal welfare checks are integrated into the work of the SVS and all the regions visited operated from a centrally issued set of instructions. All VOs in the field offices may be involved at sometime in carrying out animal welfare inspections and this allows considerable flexibility in responding to complaints of animal abuse.

### **6.3 Codes of recommendations**

Knowledge of and access to the codes for the recommendations for the welfare of livestock was emphasised by the VOs during the inspections and the requirements of the codes also form part of their system for categorising animal welfare issues on farm. However, the codes for both cattle and pigs were published in 1983 and although some of the recommendations provide an interpretation of the requirements of the Directive they do not reflect all the specific requirements of EU legislation (see point 5.3.1.5).

#### **6.4 System of recording results**

The A to D system for categorising standards of animal welfare is ambiguous for some of the issues listed (see point 5.3.1.5). In the written reports provided after the end of the mission (see point 5.3.1.5 and 5.3.2.3) in the majority of reports it was difficult to directly link the category awarded to the written comments. In addition in one case there were no written comments regarding significant issues which were discussed on the spot.

#### **6.5 Statistically representative sample**

It is unclear if the UK model for complying with article 7 of Council Directives 91/629 and 91/630 meets the requirement for obtaining a statistically representative sample of different farming systems. Also the number of random visits set as a target for the UK means that some VOs will only carry out very few such inspections in a given year. The result may be that several will be unfamiliar with the requirements. Occasionally, there was a failure on the spot to recognise some of the legislative requirements (see point 5.3.1.1 and 5.3.2.1.1).

#### **6.6 Random checks**

In selecting farms for the purposes of the checks required by article 7 of Council Directive 91/629 and article 7 of Council Directive 91/630, the ambiguity of the staff instruction led to differences in its implementation (see point 5.2.2.3). The effect of allowing local knowledge may decrease the randomness of the farm selection.

#### **6.7 Tail docking**

Efforts have been made to discourage the practice of routine tail docking of piglets. However, on several of the farms visited attempts to stop this practice completely had been unsuccessful. It may be concluded that several husbandry systems, which meet all the other requirements of the Directive, are unsuccessful in avoiding this practice.

### **7. Closing meeting**

During the closing meeting held on 3 March 2000, the competent authority asked the Commission team to present the main findings of the mission and to clarify if these were considered to be in compliance with the requirements of the Directives or not. It was only possible to have a limited discussion on the issues raised. In relation to point 6.3, it was explained to the Commission team that the welfare codes were revised on a strategic basis and that a parliamentary procedure had to be followed. However, it was also reported that the EC space requirements for caged laying hens had previously been incorporated into the *schedule of the* code for the welfare of laying hens without a major revision of the text *and in this situation the Parliamentary procedure did not apply*.

## **8. Recommendations**

### **8.1 To the central competent authorities of The United Kingdom**

The competent authorities of the United Kingdom are requested to inform the Commission within 3 months of receipt of the final mission report the actions taken and planned to address the following recommendations:

8.1.1 Take action to ensure that the specific requirements of EU legislation are more readily incorporated into the relevant code of recommendations for the welfare of livestock.

8.1.2 Clarify the instructions to the DVMs on the method of farm selection to be used when they receive their allocation of random visits.

8.1.3 Consider modifying the “farm animal welfare inspection report” form or the instruction so that the problems indicated in the findings are addressed.

8.1.4 Provide in the instructions on calf inspections, more general information to support the legal requirement for all new individual pens for calves to have perforated walls.

8.1.5 Continue to monitor the level of tail docking of piglets and analyse the factors which allow tail docking to be reduced.

### **8.2 To the Commission Services**

8.2.1 To more clearly define “statistically representative sample” when revising either Council Directives 91/629/EEC or 91/630/EEC.

8.2.2 Additional recommendations will be presented in a general report to be prepared after the completion of this series of missions to Member States.

ADDENDUM TO MISSION REPORT DG (SANCO)/1102/2000

Competent authority response to the recommendations in the report

1. The competent authority submitted comments on the draft report which were taken into consideration prior to the preparation of the final report.

2. In response to the above recommendations, the UK authorities indicated in their written comments of 26 May 2000 that it will be possible in future to more readily incorporate EU legislative requirements into the welfare codes, as a new style of code has been formulated. They also set out plans to address each of the other recommendations, but indicate that although research into welfare of growing pigs will continue in the UK, analysing the results of SVS inspections may not be a feasible way to determine the factors which may reduce tail docking of pigs.