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**FINAL REPORT OF A MISSION
CARRIED OUT IN SLOVAKIA
FROM 26 TO 30 JUNE 2006
TO REVIEW THE SYSTEM OF CONTROLS
CONCERNING ANIMAL WELFARE ON FARMS**



EXECUTIVE SUMMARY

This report describes the outcome of a mission carried out by the Food and Veterinary Office (FVO) in Slovakia, from 26 to 30 June 2006.

The main objective of the mission was to verify the implementation of EU animal welfare legislation applicable to pig, laying hen and calf farms in particular, the measures put in place to give effect to Council Directives 91/629/EEC, 91/630/EEC, 98/58/EC, 99/74/EC, and Commission Decision 2000/50/EC and to follow up the recommendations from the report DG(SANCO)/7233/2004- MR- final regarding laying hens and pigs. The mission also looked at how measures taken in relation to the above have been integrated into the approach required by Regulation (EC) 882/2004.

The report concludes that the system set up by the CCA to ensure the implementation of animal welfare requirements in laying hen, pig and calf farms is quite comprehensive. It has improved since last mission in 2004 and is in the process of being changed further to achieve compliance with the new requirements of Regulation 882/2004, such as internal audits and integrating a risk assessment approach into the inspection programmes. The practical training organised by the CCA has shown some results but has not yet had a sufficient uptake or covered all the livestock sectors. The level of supervision carried out by the regions on the districts was too variable to ensure the quality of inspections taking place.

The report makes a number of recommendations addressed to the competent authorities of Slovakia, aimed at rectifying the identified shortcomings and further enhancing the control measures in place.

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1. INTRODUCTION

The mission took place in Slovakia from 26 to 30 June 2006, as part of the planned mission programme of the Food and Veterinary office (FVO). The inspection team comprised two inspectors from the FVO.

An opening meeting was held on 26 June 2006 with representatives of the central competent authority, the State Veterinary and Food Administration (*Stana veterinarna a potravinova sprava Slovenskej republiky* hereafter: CCA). At this meeting, the objectives of, and itinerary for the mission were confirmed and additional information requested for the satisfactory completion of the mission.

Throughout the mission, the mission team was accompanied by representatives of the central and local Competent Authorities.

2. OBJECTIVES OF THE MISSION

The primary objective of the mission was to verify the application of EU requirements for animal welfare on farms. The scope included the legal and administrative measures in place regarding requirements for pigs, calves and laying hens. A secondary objective was to follow-up the actions taken to address the recommendations made in a previous report concerning animal welfare of laying hens and pigs (ref. DG(SANCO)/7233/2004- MR – final, hereafter: report 7233/2004, available under its reference on the DG Health and Consumer Protection website: http://ec.europa.eu/comm/food/index_en.htm

In pursuit of the objective, the following meetings were held and sites visited:

VISITS			Comments
Competent authority	Central	2	Opening and final meeting at the CCA headquarters.
	Regional (including local)	2	One meeting at the office of the Regional Veterinary and Food Administration of Banska Bystrica and one meeting at the office of the Regional Veterinary and Food Administration of Trnava where files and documents regarding inspections were checked.
Holdings with pigs		2	One holding in each region visited. Both farms were selected by the inspection team from a list of farms provided by the CCA.
Holdings with calves		2	One holding in each region visited selected by the inspection team from a list provided by the CCA.
Holdings with laying hens		2	One holding in each region visited. One with hens kept in unenriched cages, which were selected by the inspection team from lists provided by the CCA.

3. BACKGROUND

A previous FVO mission to Slovakia concerning animal welfare was carried out in 2004. Report 7233/2004, which dealt partly with laying hens and pigs, concluded that although the CCA had set up a reasonable system of control for animal welfare, its implementation was not fully adequate due to the lack of practical training, and more generally by the lack of monitoring and involvement at the regional level. The report recommended to the Slovak competent authorities to ensure that information

on the EU requirements was made more accessible to pig keepers, to improve the quality of inspections through practical training and subsequent monitoring of inspection results and to give explicit instructions to veterinarians to ensure that overstocking in laying hen farms is corrected without delay and that no unenriched cage system is brought into service after 1.1.2003. The CCA's action plan had satisfactorily set out how the recommendations regarding laying hens and pigs made in this report would be addressed.

4. LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation¹ and in particular Article 9 of Council Directives 99/74/EC², 91/629/EEC³ and 91/630/EEC⁴; Article 7 of Council Directive 98/58/EC⁵; Article 45 of Regulation of the European Parliament and of the Council (EC) No 882/2004⁶.

5. MAIN FINDINGS

5.1. Competent authority

Structure and responsibilities

The Competent Authority for animal welfare is the State Veterinary and Food Administration (CCA) which is a service of the Ministry of Agriculture. It includes eight Regional Veterinary and Food Administration, and 40 District Veterinary and Food Administration.

At central level, the Department of Animal Health and Animal Welfare is responsible to ensure that animal welfare inspections in farms are carried out and reported in a uniform way throughout the country (as required by points 4 of Article 4 and point 1 of Article 8 of Regulation 882/2004) and that when infringements are found during inspections, they are followed up or sanctioned (as required by Article 8 (3) b) and Article 55 of Regulation 882/2004). In order to do so, it has issued two methodical instructions on 12.11.2003 and 23.04.2004.

¹ Legal acts quoted in this report refer, where applicable, to the last amended version.

² Council Directive 1999/74/EC of 19 July 1999, laying down minimum standards for the protection of laying hens, OJ L 203 of 3.8.1999, p. 53.

³ Council Directive 91/629/EEC of 19 November 1991 laying down minimum standards for the protection of calves, OJ L 340 of 11.12.1991, p. 28.

⁴ Council Directive 91/630/EEC of 19 November 1991 laying down minimum standards for the protection of pigs, OJ L 340 of 11.12.1991, p. 33.

⁵ Council Directive 98/58/EC/EC concerning the protection of animals kept for farming purposes: L 221, 8.8.98, p. 23.

⁶ Regulation 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 (EC) No 882/2004, OJ L 165 of 30.04.2004, p. 1. Corrected and republished in OJ L 191, 28.05.2004, p.1.

The official veterinarian in charge of animal welfare in farms declared that the Department of Animal Health and Animal Welfare is working on a new methodical instruction in order to integrate the requirement for inspections in farms on a risk basis (as required by point 1 of Article 3 of Regulation 882/2004), and to improve harmonisation in the way the results of animal welfare inspections are reported (as required by Decision 2000/50/EC)⁷.

At regional level, the Department of Animal Health and Animal Welfare supervises the work of the official veterinarians in the districts. It ensures that inspection programmes are achieved and that inspection results are reported by each district.

At district level, the official veterinarians of the Department of Animal Health and Animal Welfare carry out inspections on farms.

Coordination between the central, regional and district levels exists through regular meetings organised between the regions and the districts (as required by point 3 of Article 4 of Regulation 882/2004), and between the regions and the central level. Legislation and instructions are available to each level via an intranet site.

Cooperation with other services

The State Veterinary and Food Administration cooperates with different bodies such as the Department of rural Development of the Ministry of Agriculture and the Agricultural Paying Agency for Subsidies which are in charge of implementing rural development programmes (Council Regulation (EC) N°1257/1999⁸) and dealing with cross compliance issues (Council Regulation (EC) N°1782/2003⁹). Under a common agreement between the State Veterinary and Food Administration and the Agricultural Paying Agency, control activities are carried out by the District Veterinary and Food Administration. From a practical point of view, the Agricultural Paying Agency has regional units which will request the information they need to make their decision from the districts official veterinarians.

Training of inspectors

The CCA organises training for the inspectors performing animal welfare checks in farms, as required by Article 6 of Regulation 882/2004.

⁷ Commission Decision 2000/50/EC of 17 December 1999 concerning minimum requirements for the inspection of holdings on which animals are kept for farming purposes, OJ L 19 of 25.1.2000, p.51.

⁸ Council Regulation (EC) N° 1257/1999 of 17 May 1999 on support for rural development from the European Agricultural Guidance and Guarantee Fund (EAGGF) OL J 160, 26.6.1999, p.80. Regulation as last amended by Regulation (EC) N° 2223/2004 (OJ L 379, 24.12.2004, p.1).

⁹ Council Regulation (EC) N° 1782/2003 of 29 September 2003 establishing common rules for direct support schemes for farmers and amending Regulations (EEC) N°2019/93, (EC) N°1452/2001, (EC) N° 1453/2001, (EC) N°1454/2001, (EC) N° 1868/94, (EC) N° 1251/1999, (EC) N°1254/1999, (EC) N°1673/2000, (EEC) N°2358/71 and (EC) N°2529/2001, OJ L 270, 21.10.2003, p.1.

- Regarding initial education, inspectors carrying out animal welfare checks in farms are doctors in veterinary medicine.
- Regarding continuing education, the CCA organises training in cooperation with a national institute or with TAIEX and approves the annual plan of training which will be made available to the official veterinarians. The CCA ensures that official veterinarians from all regions have access to these training events and recommends to the regions that the information be disseminated to all the district inspectors.

In 2004 and 2005, following the recommendation of report 7233/2004 requesting practical training for the inspectors, the CCA organised training on requirements for laying hens in the eight regions of the country which included a practical demonstration on how measurements of cages should be made. In 2005, training concerned pigs, with a practical part organised by TAIEX for the regional inspectors.

The inspection team noted that no practical trainings on animal welfare of calves have been organised.

Supervision and audits

Currently, the regions supervise the districts which are under their responsibility. On the basis of an unwritten agreement with the CCA, a general control should be carried out by the regions in each district every year. Ad hoc controls in case of problems can also be carried out. There are no specific controls regarding a particular area such as animal welfare.

For the near future and in order to comply with point 6 of Article 4 of Regulation 882/2004 which requires that the CA carries out internal audits, the CCA indicated that they had proposed an amendment of the legislation in order to give the responsibility of carrying out internal audits to the regions.

Sanctions

The CCA indicated that the different administrative and penal sanctions and the competence of the different services that can be applied in the case of animal welfare infringements are described in their general law 488/2002 on animal welfare. Official veterinarians at district level have the power to give administrative sanctions which can be appealed at the regional level. Administrative sanctions range from prescribing measures with a deadline, to giving a fine or to forbidding the movement of animals or products. Penal sanctions are prescribed only in the case of serious offences.

5.2. Legislation

The CCA informed the inspection team that the relevant EU legislation has been transposed into national legislation and has been in force since 1.1.2003.

A review of the national legislation was not performed by the inspection team but in relation to legal aspects the inspection team noted that:

- Regarding pigs, the provisions of Article 5a of Directive 91/630/EC, which requires that pig keepers receive training on animal welfare, have been expanded so that Slovak pig keepers have to be trained regularly, at least every five years, and must demonstrate that they received training by producing certificates.
- Regarding calves, according to the CCA, all holdings (with more than 6 calves) built before 1.1.2003 were compliant with the requirements of paragraph 1 of Article 3 of Directive 91/629/EEC because the previous Slovak legislation on calves applicable before 1.1.2003 had higher requirements than this paragraph. As a result, the CCA said that all holdings with more than 6 calves built before 1.1.2003 benefit from the derogation of paragraph 4 of Article 3 of Directive 91/629/EEC and therefore established that they will have to comply with the requirements of paragraph 3 of Article 3 of Directive 91/629/EEC only from 1.1.2007.
- All calf holdings built after 1.1.2003 have to comply with the requirements of paragraph 3 Article 3 of Directive 91/629/EEC.

5.3. Measures supplementary to inspections

The CCA uses different means to inform farmers on animal welfare requirements.

Training of pig keepers

The CCA has followed the recommendation in report 7233/2004 which requested that information on animal welfare requirements for pigs had to be distributed through available network (as required by Article 5a of Directive 91/630/EEC). Several bodies and organisms propose training courses for pig keepers. To provide such courses, they have to be accredited by the Ministry of Education and the curriculum of the classes has to be approved by the CCA. Staff from the CA at central or local level can be invited as speakers by these organisms. Classes are organised in each region and as soon as there is a sufficient number of pig keepers who want to attend. Additionally, in case of large farms, training can be provided on the spot if the owner of the farm is ready to pay a fee. Certificates of training are given to the pig keepers who attended the training. The inspection team noted that these documents are checked by the inspectors during the pig farm visits and that in case they can't be provided, recommendations are made to owners of pig farms that they have to provide these certificates of training for the staff employed.

Binding opinions for new buildings or subsidies

Legal or administrative national provisions ask that opinions of the CA must be requested by the building authorities or by the paying agency of agricultural subsidies when farms are built or rebuilt. The opinions given by the CA based on animal health and animal welfare criteria are binding.

During the mission, no valid examples of these opinions could be provided to the inspection team. The CCA explained that regarding new buildings, this was due to the fact that the building authorities have changed recently. Delivering building permits is now within the responsibilities of municipalities and they are not always aware that they need a binding opinion of the CA before they can authorise the building or rebuilding of a farm.

5.4. Pigs

Programme of inspections

The two methodical instructions of 23.4.2004 and of 12.11.2003 issued by the CCA request that 7.5% of pig farms (with a minimum of 20) are checked every year in each district and that the farms chosen should make a representative sample of the different technologies used to raise pigs.

- In both regions visited, the district official veterinarians selected the farms which will be visited according to these objectives and wrote an annual programme including different types of farms at the beginning of each year. The programme was then communicated to the region for supervision.
- In both regions visited, the number and objectives of the inspections planned for the pig sector in 2005 were achieved.

Performance of inspections

In both farms visited, the inspection team noted that the district official veterinarians used the detailed check list provided and carried out comprehensive checks. They measured the environmental parameters such as the intensity of light, the temperature and the hygrometry with technical devices and they controlled if there was a back up system for the ventilation. They checked the documents regarding the training received by pig breeders, the records of mortality and the records of medicine. Checks that mutilations on pigs were not carried out unless they were necessary by requesting evidence from the owners that they had tried to avoid mutilations by other measures such as increasing the amount of proteins in the feed or providing manipulable material and, in the case of tail docking, by requesting an attestation from the private veterinarian employed by the farm that this surgical procedure was necessary in order to avoid cannibalism.

However, there was a difference in the way the inspections were carried out between the two regions and some deficiencies were not detected by the official veterinarians.

- In Banska Bystrica Region, the method used by the inspector to calculate the space allowance available per pig in pens (prescribed by point 1 (a) of Article 3 of Directive 91/630/EEC) was not adequate. The official veterinarian did not retract the surface obstructed by the feeding trough to obtain the total unobstructed area of the pens and when calculating the space allowance available per pig, he divided the area by the mean number of animals present in the pens instead

of the maximum number of animals present in the pens. Therefore the inspector did not detect overcrowding in some of the pens. He did not detect that sick animals were housed in a pen without bedding (contrary to point 4 of the Annex of Directive 98/58/EC) and without access to water (contrary to point 7 Chapter I of the Annex of Directive 91/630/EEC) and that in the case of young animals not yet registered, there was no means to identify animals which had received treatments (contrary to Article 10 of Council Directive 96/23/EC)¹⁰. He did not check if there was an alarm system for the artificial ventilation (required by point 13 of Annex of Directive 98/58/EC). He measured a light intensity of 15 Lux in the building used for growing pigs but did not record on the check list that this was not compliant since it was below the 40 Lux required by point 2 Chapter I of the Annex of Directive 91/630/EEC. Finally, although he checked that there was manipulable material available to the pigs (as required by point 4 Chapter I of the Annex of Directive 91/630/EEC), he did not record that it was missing in one building.

- In Trnava Region, the quality of inspection was better. However, the official veterinarian did not detect that the boar pens were less than the 6m² required by Chapter A of the Annex of Directive 91/630/EEC.

Both inspectors had received training regarding the conduct of inspections in pig farms.

Records and follow up

Files of farms where non compliances had been detected in 2005 had been requested by the inspection team prior to the office visits. All the files requested could be provided in Trnava Region but not in Banska Bystrica Region. Files showed that:

- The results of inspections were recorded on the check lists which have a part dedicated to the summary of the findings and another part to the recommendations made to the farmers.
- When deficiencies were detected, the inspectors gave recommendations to the farmer with a fixed deadline to correct each deficiency, following the methodical instructions of the CCA.
- Specific follow up visits were carried out shortly after the deadlines to ensure that the corrective actions required had been put in place by the farmers.
- Where deficiencies were serious, such as in one case with both infringements of animal health and welfare legislation, a decision

¹⁰ Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC, OJ L125 of 23.5.96, p.10.

was issued in less than three months by the District Veterinary and Food administration imposing a fine to the farmer.

Supervision

The level of supervision was different between the two regions. In Banska Bystrica Region, the head of the regional department of animal health and welfare checked at the end of each year whether the districts annual programmes of inspections had been achieved. In Trnava Region, the head of the regional department of animal health and welfare verified that the programmes of inspections were being carried out by the districts on a regular basis throughout the year. This was done during meetings with the districts and by following some of his inspectors during pig farm visits to assess their inspections and by requesting copies of all files where non compliances had been recorded.

5.5. Calves

Rearing system

Fattening calf farms specialised in the production of white meat do not exist in Slovakia. Calves less than 6 months old are housed mainly in dairy farms or in farms selling adult cattle for the production of red meat.

Programme of inspections

The two CCA instructions of 12.11.2003 and 23.04.2004 request that at least 10 % of calf farms (with a minimum of 10 farms per district) with more than 6 calves are checked every year and that the farms chosen should make a representative sample of the different technologies used to raise calves. In both regions visited, the districts selected the farms which will be visited according to these objectives and wrote an annual programme at the beginning of each year which was communicated to the region for supervision. In both regions visited, the number and objectives of inspections planned in 2005 were achieved.

Performance of inspections

Two calf farms were visited in each region and the inspection team noted that there was a difference in the way the checks were carried out between the two regions:

- In Trnava Region, the official veterinarian used the check list provided. The check carried out ensured that the record of medicines was kept using the template provided by the CCA and the registration numbers of the calves which had received treatments were recorded. The official veterinarian checked that calves had permanent access to water and to fibrous feed (straw) after 2 weeks of age. He also checked that calves housed in groups had sufficient unobstructed floor space. The inspector pointed out that although the width of some of the wooden individual boxes used in the farm visited complied with the current requirements of point 1 of Article 3 of Directive 91/629/EC, they will not comply when the new

requirements for the width of point 3 (a) of Article 3 of Directive 91/629/EC will come into force from 1.1.2007. However, he did not detect that many of the calves housed in these individual boxes were older than 8 weeks and that this practice will be forbidden from 1.1.2007 (as required by point 3 (a) of Directive 91/629/EEC). No recommendation was made to the farmer to ensure that calves older than 8 weeks will have to be housed in collective pens after 1.1.2007.

- In Banska Bystrica Region, the official veterinarian did not perform an adequate control as he did not use the check list and most of the requirements specific to calf holdings were not checked.

Neither of the inspectors had received practical training in the last two years regarding animal welfare inspections in calf farms.

Records and follow up of inspections

The files of previous inspections seen in the two regional offices of Banska Bystrica and Trnava showed that:

- Tethering of calves is detected and reported. Deadlines for compliance were given to the farmers and follow up visits were carried out shortly after the deadlines given to ensure that the calves were no longer tethered.
- One file in Trnava region also showed that insufficient unobstructed floor space was available to the calves housed in collective pens in a farm built before 1.1.2003 (contrary to Article 3 point 3 of Directive 91/629/EC). This was detected and reported and it was indicated that this will have to be corrected before the 31.12.2006.

Supervision

The supervision is organised as for the pig sector, exception made to the fact that the regional head of department of Trnava Region did not do joint inspections with the district inspectors in the case of calf farms.

5.6. Laying hens

Rearing system

Unenriched cage is the main rearing system used for laying hens and few farms are using alternative system or enriched cage technologies in Slovakia. Beak trimming is very rarely performed in Slovakia. According to the CCA, there was only one farm in Slovakia which trimmed the beaks of hens in 2006 and it will stop doing so in 2007. Therefore beak trimming will not be practiced anymore in Slovakia in 2007. The CCA explained that although this practice is not forbidden by their national legislation, it is discouraged. The inspection team saw in both farms visited that the laying hens were not beak trimmed.

Registration

The register of farms with more than 350 laying hens is kept at central level by the State Veterinary and Food Administration. It contained all the information required by Commission Directive 2002/4/EC¹¹. The registration procedure has changed since the last mission (report 7233/2004). Following an amendment of the Slovak legislation, the competence to register and approve laying hen farms and egg packaging centres has been given to the District Veterinary and Food Administration since 1.8.2005. Under this new procedure

- The owner has to make an application providing information such as the maximum capacity, proof of ownership of the farm and registration as a business.
- This information is then verified on the spot by an official veterinarian who conducts an inspection using two check lists, one for animal health and one for animal welfare requirements. If the result of this inspection is satisfactory, a positive opinion is given by the District Veterinary and Food Administration to the farmer.
- On reception of this opinion, the State Veterinary and Food Administration attributes a unique number to the farm in accordance with the requirements of Commission Directive 2002/4/EC.
- Farmers have the legal obligation to inform the District Veterinary and Food Administration when there is a change in the information provided for registration such as changes of maximum capacity or of farming method.

In the Region of Banska Bystrica, the inspection team noted that changes have been communicated by the farmers and that the central register has been modified accordingly.

Programme of inspections

The methodical instruction of 23.4.2004 requests that 100% of laying hen farms with more than 350 laying hens are checked every year. Previously, laying hen farms had to be checked every two years. In both regions visited, all laying hen farms had been inspected in 2005; although not all the buildings where laying hens are kept are always visited during these inspections.

Performance of inspections

The official veterinarians used the comprehensive check list provided by the CCA and measured the temperature, hygrometry and intensity of light with appropriate technical devices.

- Regarding the visit in the laying hen farm with unenriched cages in Trnava region, the official veterinarian knew how to assess

¹¹ Commission Directive 2002/4/EC of 30 January 2002 on the registration of establishments keeping laying hens, covered by Council Directive 1999/74/EC, OJ L 30 31.1.2002, p.44.

requirements such as the floor area of the cages, the length of the feeding troughs, the number of nipples available per hen, and to check that cages measured not less than 35 cm at any point, which was an improvement compared to the last mission in 2004. However, the official veterinarian did not know how to assess the slope of the cages and did not detect that the slopes of the cages were not in compliance with point 5 of Article 5 of Directive 99/74/EC. The inspector did not check whether the cages were at least 40 cm high over at least 65% of the cage area (Directive 99/74/EC Article 5 point 1.4). The representative of the CCA explained that this specific point is not covered in the check list because according to their calculations this requirement would be automatically fulfilled if the minimum requirements for the slope of the cage and the height were met. Moreover, the inspector did not detect the absence of claw shortening devices in most of the cages (Directive 99/74/EC Article 5 point 1.6), overcrowding in some cages (Directive 99/74/EC Article 5 point 1), and did not make any remarks regarding the fact that in one building the frequency of removal of the droppings was not sufficient (point 4 of the Annex of Directive 99/74/EC).

- Regarding the visit to a barn system in Banska Bystrica Region, the farm visited had been built before 1.1.2003 and will have to comply with the requirements of Article 4 of Directive 99/74/EC from 1.1.2007. The official veterinarian relied only on the information provided to him by the owners and their private veterinarian to fill up his check list and when asked to verify the information provided, he did not know how to assess adequately most of the requirements of Article 4 of Directive 99/74/EC. He calculated the usable area available per hen without retrieving the space occupied by the nests (contrary to Article 2 point 4 (d) of Directive 99/74/EC) and as a result miscalculated the stocking density required by Article 4 point 4 of Directive 99/74/EC. He did not detect several deficiencies regarding the perches: The perches were placed above the littered area, some of them were situated at a distance of less than 20 cm from the nests' walls, and others were horizontally separated by less than 30 cm contrary to Article 4 point 1.1 (d) of Directive 99/74/EC. Moreover, he did not measure the length of the feeding trough appropriately (Directive 99/74/EC Article 4 point 1.1 (a)) or did not take any measurements to ensure that each hen had at least 250 cm² of littered area as required by Article 4 point 1.1 (e) of Directive 99/74/EC. As a result, he could not make any recommendations to the owners regarding the points to ensure that by 1.1.2007, the building of this farm is compliant with the requirements of Article 4 of Directive 99/74/EC.

None of the two official veterinarians had followed the practical training regarding laying hens organised by the CCA in the regions in 2004 and 2005. The CCA explained that not all the inspectors could attend and that it was within the responsibility of the Regions and the Districts to select which inspectors had to attend this training and to disseminate the information received during this training to the districts.

Records and follow up of inspections

The results of inspections are recorded on the check list with a part dedicated to the summary of the findings and another part to the recommendations made to the farmer, which he has to sign. In both regions, the inspectors identify the farm they had visited by its registration number on the check list but did not identify which buildings they had visited when a farm had several buildings. This practice led to some confusion for the inspectors when they wanted to ensure that the corrective actions asked following previous inspections had been effectively put in place in one particular building.

The inspection team could not make an adequate assessment of the follow up actions taken by the inspectors since the files requested could not be found in the Region of Banska Bystrica and no deficiencies had been reported in the Region of Trnava for 2005.

Supervision

The supervision is organised as for the pig sector, exception made to the fact that the regional head of department did not do joint inspections with the district inspectors in the case of laying hen farms.

The inspection team noted that in Trnava Region, the regional level had not reacted when in 2005 no deficiencies had been reported following the 100% checks of laying farms registered in the Region.

5.7. Reporting

Commission Decision 2000/50/EC requires that the CCA reports to the Commission every two years on the results of inspections of holdings with pigs, calves and laying hens. In order to fulfil this obligation, the CCA provided templates where results of inspections have to be recorded but no specific explanation was provided in this instruction on the way the information should be recorded by the inspectors in the districts. At the end of each year, the districts send the tables in an electronic format to the regions and the CCA. Then the CCA makes a summary table for each sector in the country each year and sends the report to the commission every two years. The inspection team noted that the data collected were not always accurate:

- There was a mistake in the total number of laying hen, pig and calf holdings recorded in the tables for 2005 (this mistake was corrected and the real figures provided during the mission).
- In both regions visited, the inspectors reported in the tables only the infringements in laying hen, pig and calf farms that could be classified easily in the nine categories provided in Commission 2000/50/EC; the other infringements were not recorded.

- In one district, in Trnava Region, the inspector responsible for laying hen farms reported the infringements found in all laying hen farms in his district instead of reporting only infringements in laying hen farms with more than 350 laying hens.

The CCA explained that they were partly aware of these inaccuracies and that the new methodical instruction currently in project will address this issue.

6. CONCLUSIONS

6.1. Competent Authority

- (1) The structure and the organisation of the CA are adequate with responsibilities between the central, regional and district levels clearly defined and a good coordination between the central, the regional and the district levels. However, the level of supervision carried out by the regions on the districts differs from one region to another and as a consequence, where the level of supervision is not sufficient, the performance of inspections is of lower quality (contrary to point 4 of Article 4 of Regulation 882/2004).
- (2) The instructions to official veterinarians are comprehensive and describe how the controls should be performed, followed up and, if necessary sanctioned as required by Article 8 points (1) and (3) (b) and Article 55 of Regulation 882/2004. The CCA is working on integrating a risk based approach in the organisation of inspections on animal welfare as required by point 1 of Article 3 of Regulation 882/2004 and on changing the legislation to set up a system of internal audits to analyse the results of inspections as required by point 6 of Article 4 of Regulation 882/2004.
- (3) The training organised by the CCA, as required by Article 6 of Regulation 882/2004, in response to a recommendation in report 7233/2004, has ensured that practical training has been provided but this has not yet included all veterinarians or all sectors with the result that it has had sometimes a limited effect on the quality of inspections.

6.2. Measures supplementary to farm inspections

- (1) Following a recommendation in report 7233/2004, the CCA has ensured that training on animal welfare requirements is available to pig keepers as required by Article 5a of Directive 91/630/EEC.
- (2) The other means used by the CCA to the various livestock sectors such as providing binding opinions to building authorities when a building permit is required or to the Agricultural Paying Agency when a request for subsidies is made by a farmer, provides a framework for diffusion of information on the new requirements.

6.3. Pigs

- (1) The programme of inspections set up by the CA ensures that a representative sample of pig farms is checked as required by point 1 of Article 7 of Directive 91/630/EEC.
- (2) Official veterinarians overall performed comprehensive checks thanks to the check lists and practical training provided by the CCA. Moreover, appropriate follow up actions were carried out to ensure that when deficiencies had been detected and recorded, they were corrected in a timely way.
- (3) Due to a difference in the level of supervision of the districts by the regional level, the quality of inspections was not uniform. As a result, in the region with the lower level of supervision, official veterinarians did not detect or record deficiencies as well as in the other region with the higher level of supervision.

6.4. Calves

- (1) The programme of inspections set up by the CA ensures that a representative sample of calf farms is checked as required by point 1 of Article 7 of Directive 91/629/EEC.
- (2) As most calf farms in Slovakia are not intensive fattening farms for white meat, and even those built before 1.1.2003 had to comply with a stricter national legislation before accession, the dimensions of individual boxes and collective pens complied with the requirements of point 1 of Article 3 of Directive 91/629/EEC which apply till 31.12.2006.
- (3) The check list provided by the CCA was comprehensive in listing the legal requirements, but inspections were not carried out in a harmonized way due to the lack of practical training given to the inspectors and the effect of this was compounded in one region by inadequate supervision of the inspectors carried out by the regional level. As a result, the requirement for calves older than 8 weeks to be housed in group pens (point 3 (a) of Article 3 of Directive 91/629/EEC) was not checked by the official veterinarians and farmers were not informed that this will apply to all farms from 1.1.2007.
- (4) Procedures for follow up actions are emphasised in CCA instructions and were followed when deficiencies such as tethering and inadequate space allowance were detected.

6.5. Laying hens

- (1) The procedure of registration of laying hen holdings ensures that the data in the register are checked by official veterinarians, are updated and centralised. As a result, the register of laying hen farms is kept in compliance with the requirements of Directive 2002/4/EC.
- (2) The CCA has improved the system of checks in laying hen holdings since the last mission in 2004: 100 % of laying hen farms are now checked every year and practical training have been provided at each regional level in 2004

and 2005. As a result, the quality of inspections carried out of unenriched cages, which is the main rearing system used in Slovakia, has improved compared to report 7233/2004. However, as the practical training did not reach all of the inspectors performing the controls, some requirements were not checked adequately. Regarding unenriched cages, official veterinarians did not detect some major deficiencies. Regarding alternative systems, official veterinarians did not know how to perform an adequate check of the EU requirements of Article 4 of Directive 99/74/EC which will be applicable to all farms from 1.1.2007.

- (3) In addition, and contrary to a recommendation requiring a better monitoring of inspectors made in report 7233/2004, supervision by the regional level has not been sufficient to ensure that rates of detection of deficiencies were improved.

6.6. Reporting

The results of inspections carried out are reported in the format required by Commission Decision 2000/50/EC, thanks to an instruction and electronic templates provided to the districts and regions. However, since no precise instruction was given to the inspectors on how to fill up the templates and the regions didn't analyse closely enough the results sent to them by the districts, there have been inaccuracies in the data collected. The CA indicated that they will address this issue by providing guidance to the inspectors in the new methodical instruction on animal welfare currently underway.

6.7. Overall conclusion

The system set up by the CCA to ensure the implementation of animal welfare requirements in laying hen, pig and calf farms is quite comprehensive. It has improved since last mission in 2004 and is in the process of being changed further to achieve compliance with the new requirements of Regulation 882/2004, such as internal audits and integrating a risk assessment approach into the inspection programmes. The practical training organised by the CCA has shown some results but has not yet had a sufficient uptake or covered all the livestock sectors. The level of supervision carried out by the regions on the districts was too variable to ensure the quality of inspections taking place.

7. CLOSING MEETING

A closing meeting was held on 30 June 2006 with the CCA. At this meeting the FVO inspection team presented the main findings and conclusions. The CCA did not indicate any disagreement with the findings presented, and indicated that the issues raised will be addressed.

8. RECOMMENDATIONS

To the competent authorities of Slovakia

Within 25 working days of receipt of the report, the Competent Authorities are requested to present a plan of actions, including a timetable for their completion, to address the following recommendations.

The CCA should ensure that measures are taken so that:

- (1) Audits are carried out in order to assess the results of animal welfare inspections as required by point 6 of Article 4 of Regulation 882/2004.
- (2) Controls of animal welfare in farms are carried out on a risk basis as required by point 1 of Article 3 of Regulation 882/2004.
- (3) Practical training for conducting animal welfare inspections in farms is accessible to the district official veterinarians performing the controls and is organised for all sectors, including holdings with calves, as required by Article 6 of Regulation 882/2004.
- (4) Regions improve their level of supervision on the districts as required by point 4 of Article 4 of Regulation 882/2004.

9. COMPETENT AUTHORITY RESPONSE TO RECOMMENDATIONS

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

http://ec.europa.eu/comm/food/fvo/ap/ap_slovak_republic_8047_2006.pdf