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FINAL REPORT OF AN AUDIT
CARRIED OUT IN
ITALY
FROM 09 TO 18 NOVEMBER 2011
IN ORDER TO EVALUATE THE IMPLEMENTATION OF CONTROLS FOR ANIMAL
WELFARE ON FARMS AND DURING TRANSPORT

Executive Summary

This report describes the outcome of a Food and Veterinary Office (FVO) audit which took place in Italy from 9 to 18 November 2011. The audit evaluated the implementation of national measures for the control of animal welfare on farms and during transport and followed up certain outstanding recommendations from report DG SANCO/2010-8388 (hereafter: report 2010-8388) on the same issues.

Report 2010-8388 concluded that controls on farm were being carried out regularly but the CCA had not provided sufficient guidance and interpretation on certain requirements of the Directive on pigs to enable official veterinarians (OVs) to effectively enforce official controls relating to fibre and energy requirements for pregnant sows and gilt, enrichment material and the practice of routine mutilations.

The laying hen sector in Italy was not making any concerted effort to replace unenriched with enriched cages in the lead-in to the ban on unenriched cages in 2012. Overstocking of premises was seen in both regions visited but not always detected by the competent authority (CA); sanctions imposed were not sufficiently dissuasive to ensure compliance. Forced moulting was tolerated by the CA in Lombardia.

The system of controls for checks on the fitness of animals upon arrival at slaughterhouses and consequent enforcement of certain requirements of Regulation (EC) No 1/2005 had improved since the last audit in 2008. OVs had been well informed and trained on the requirements of the Regulation and cases had been seen where local CAs had applied enforcement measures to ensure it was complied with in this regard, with the exception of the lack of measures against private practitioners who had provided false or misleading certification on the fitness of animals for transport.

Controls on the condition of animals arriving from long distance transportation were being routinely carried out, but controls on the accuracy of journey logs accompanying animals to their destination were failing to spot basic deficiencies in their completion.

Eight recommendations were made to address the above mentioned deficiencies and the CCA provided an action plan with proposed corrective measures.

Four of the eight recommendations from 2010 can now be considered mostly satisfactorily addressed with action initiated for two others. However, the actions taken by the CCA with regards to forced moulting have not obtained an adequate reaction from the regional level. In addition neither the CCA nor the regions have yet effectively addressed the issue of applying sanctions against private practitioners issuing false or misleading certificates for fitness for transport of cull cows. As amendments proposed in 2010 for the system of sanctions against overstocking of laying hen cages have not been adopted and discussions are still ongoing at central level concerning the strategy to be used from January 2012 against non-compliant holdings with laying hen in unenriched cages, it is unclear what measures the CAs will apply regarding the use of unenriched cages after 1/1/2012.

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

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
AUSL	Local Health Units (<i>Aziende Unità Sanitarie Locali</i>)
CA	Competent Authority
CCA	Central Competent Authority
EU	European Union
FNOVI	National Federation of Professional Associations of Veterinarians (<i>Federazione Nazionale degli Ordini Veterinari</i>)
FVO	Food and Veterinary Office
MH	Ministry of Health
OV	Official Veterinarian
SNS	Satellite Navigation System
UVAC	Veterinary Offices for Compliance with Community Requirements (<i>Uffici Veterinari per gli Adempimenti degli Obblighi Comunitari</i>)

1 INTRODUCTION

This audit took place in Italy from 9 to 18 November as part of the planned audit programme of the Food and Veterinary Office (FVO).

An opening meeting was held with the competent authorities of Italy on 9 November 2011. 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 inspectors from the FVO, and one expert from a European Union (EU) member state. Representatives from the the Ministry of Health (MH), the Central Competent Authority (CCA) accompanied the audit team for the duration of the audit.

2 OBJECTIVES

The main objective of the audit was to verify the implementation of EU animal welfare legislation applicable to pig, broiler and laying hen farms and transport of animals, in particular the measures put in place to give effect to Council Directives 2008/120/EC, 98/58/EC, 1999/74/EC, 2007/43/EC, Regulation (EC) No 1/2005 and to follow up the recommendations from report 2010-8388 regarding animal welfare on farms and during transport. The audit also looked at how measures taken in relation to the above are being integrated into the approach required by Regulation (EC) No 882/2004 of the European Parliament and of the Council.

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

Visits			Comments
Competent authority	Central	2	Opening and final meetings
	Regional	2	Emilia Romagna and Veneto
	District		AUSL representatives from both regions were met either during the regional meetings or during site visits.
Farms		6	2 holdings for broilers, 2 for laying hens and 2 for pigs. The sites were selected by the audit team.
Assembly centres		1	
Slaughterhouses		2	Slaughtering bovine animals and in particular cull cows.
Transporters premises		1	

3 LEGAL BASIS

The audit was carried out under the general provisions of European Union legislation, in particular Article 45 of Regulation (EC) No 882/2004. A full list of the legal instruments referred to in this

report is provided in the Annex and refers, where applicable, to the last amended version.

4 BACKGROUND

The most recent previous audit concerning animal welfare of farm animals and during transport in Italy was carried out in March 2010, and its results are described in report 2010-8388, published on the website of the Directorate-General for Health and Consumers: http://ec.europa.eu/food/fvo/ir_search_en.cfm.

That report concluded that controls on farm were being carried out regularly according to the National Plan for Animal Welfare but the CCA had not provided sufficient guidance and interpretation on certain requirements of the Directive on pigs to enable official veterinarians (OVs) to effectively enforce official controls relating to fibre and energy requirements for pregnant sows and gilts, enrichment material and the practice of routine mutilations.

The laying hen sector in Italy was not making any concerted effort to replace unenriched with enriched cages in the lead-in to the ban on unenriched cages in 2012. Approximately 84% of premises in Italy were still using unenriched cages, one year and a half before the ban on their use would come into effect. Overstocking of premises was seen in both regions visited but not always detected by the competent authority (CA); sanctions imposed were not sufficiently dissuasive to ensure compliance. Forced moulting was tolerated by the CA in Lombardia.

The system of controls for checks on the fitness of animals upon arrival at slaughterhouses and consequent enforcement of certain requirements of Regulation (EC) No 1/2005 had improved since the last audit in 2008. OVs had been well informed and trained on the requirements of the Regulation and cases had been seen where local CAs had applied enforcement measures to ensure it was complied with in this regard, with the exception of the lack of measures against private practitioners who had provided false or misleading certification on the fitness of animals for transport.

Controls on the condition of animals arriving from long distance transportation were being routinely carried out, but controls on the accuracy of journey logs accompanying animals to their destination were failing to spot basic deficiencies in their completion which may have important consequences for the welfare of the animals being transported.

The CCA indicated that certain actions had been taken in response to the recommendations, and the effectiveness of several of these actions was assessed during the current audit.

5 FINDINGS AND CONCLUSIONS

5.1 COMPETENT AUTHORITY

A detailed description of the CAs can be found in the FVO country profile for Italy which is accessible at: http://ec.europa.eu/food/fvo/country_profiles/CP_italy.pdf.

Findings

Recommendation five of report 2010-8388 requested the CCA to take measures to ensure that verification procedures as required by Article 8 of Reg. 882/2004 are put in place and implemented in relation to the official controls performed at regional level and that verification of controls at CCA level is strengthened.

In response the CCA stated that it would give the Ministry – Regions working group on animal welfare a mandate to assess the guidelines for the Regions on the correct application of Article 8. In addition measures to implement the internal audit system namely financial support and an internal

monitoring system had been put in place to make implementation of the audit programme more rigorous. All actions proposed would be implemented by July 2011.

- The audit team was informed that the guidelines on the correct application of Article 8 of Reg. 882/2004 are still at the draft stage and being discussed between central level and regions.
- The animal welfare office of the CCA (Office VI) has performed animal welfare audits over some of the regions. Reports for the two regions already audited in 2011 showed that significant shortcomings had been detected in both cases such as: lack of supervision over the official controls, lack of written procedures and guidelines for the official controls, lack of animal welfare training, lack of risk assessment for deciding animal welfare controls, poor detection of shortcomings in laying hen farms as well as forced moulting practised (and known to be) without any action from the official services, shortcomings with transport checks were also noted.
- Nine of the 21 regions and autonomous Provinces have since 2003 until now not been audited yet on animal welfare with some of them being quite important from a livestock point of view, e.g.: Emilia Romagna (pigs, broilers, laying hens, bovines), Piemonte (pigs, laying hens, broilers), Lazio (laying hens, broilers).
- Audits performed by the regions over the AUSL cover the AUSL systems as well as compliance with planned inspection programmes. However, none of the regions visited is performing audits on the effectiveness of AUSL animal welfare controls on farms and during transport. Both regions had implemented auditor training and intended to start such audits in 2012.
- The CCA has implemented an internal monitoring system through which its Office IX receives monthly updates from each central level Office concerning their compliance with the planned annual sectoral audit programme. If during a sectoral audit shortcomings are detected concerning sectors other than the one being audited the audit report is required to be sent also to the Office responsible for that sector. Minutes of coordination meetings where the annual sectoral plan for animal welfare was discussed and modified were provided to the audit team.

Conclusion

The CCA has performed verification of the official controls performed at the regional level, as recommended, and detected significant deficiencies in both cases in the areas assessed demonstrating the importance of such verification. Nevertheless some important regions, from a livestock and therefore also animal welfare point of view, have not been supervised yet in this regard since 2003.

Both regions visited by the audit team, and the two regions visited by the CCA in 2011, had not started yet their own verification procedures over the effectiveness of the AUSL official controls on animal welfare at farm and during transport.

Recommendation five of report 2010-8388 has been satisfactorily addressed by the CCA but not yet by the regions.

5.2 FARM INSPECTIONS

5.2.1 Laying hen farms

Legal requirements

Article 8 of Directive 1999/74/EC requires that the CA has to carry out checks to monitor compliance with the requirements of this Directive.

Article 5.2 of Directive 1999/74/EC requires that the Member States shall ensure that rearing of laying hens in unenriched cages is prohibited with effect from 1 January 2012.

Commission Directive 2002/4/EC requires Member States to establish a system for registering every production site covered by the scope of Council Directive 1999/74/EC. The last paragraph of Point 1 of the Annex of this Directive requires the registration of the maximum capacity of an establishment in number of birds present at one time.

Findings

Recommendation one of report 2010-8388 requested the CCA to take measures to ensure that staff performing official controls on laying hen farms receive clear guidance and interpretation to enable them to effectively enforce legislative requirements.

In response the CCA stated that by September 2010 it would send two notes to all the Regions and the National Reference Centre for Animal Welfare requesting respectively correct performance of official controls on laying hen farms and that from 2011 new training courses for OV's must pay particular attention to the correct performance of official checks. In addition a restructuring of the MH website would make it easier, from January 2011, for officials to access existing information notes and ministerial instructions.

- The two above mentioned notes have not been sent.
- The MH website has been updated and relevant information is available there.
- There was a very high frequency of laying hen farm checks in Emilia Romagna with a lower but still high frequency in Veneto. Both regions exceeded the 10% target foreseen in the national control plan for animal welfare for 2010.
- Deficiencies in the farm visited in Emilia Romagna had been detected by the OV's during a previous visit and corrective measures taken. OV's had recently attended relevant animal welfare training provided at the National Reference Centre for Animal Welfare.
- No deficiencies were noted in the farm visited in Veneto other than a need to adequately separate in the production records the number of eggs coming from each of the two types of production present (enriched cages and alternative).
- In both regions the OV's carried out their tasks in a satisfactory way.
- Doubts were raised by the OV's concerning the assessment of perches in enriched cages and in alternative systems with both regions stating that this would be a point for which national level guidelines would be welcome.

Recommendation four of report 2010-8388 requested the CCA to take measures to ensure that sanctions for the enforcement of legislative requirements on laying hen premises are effective, proportionate and dissuasive as required by Article 55 of Reg. 882/2004.

In response the CCA stated that it was examining proposed amendments to the legislation in force and that this had been discussed during an inter-ministerial and industry meeting in November 2010.

- The audit team was informed that none of the proposals for amending national legislation implementing EU level requirements in this area (including the one relevant for administrative sanctions concerning laying hens) was approved by parliament in 2010. In October 2011 the MH agreed to present this amendment for approval again.

- Documentation of official controls of laying hen farms provided to the audit team in one region showed that a farm fined 3 111 Euro in 2010 for overstocking its enriched cages had been again fined in 2011 the same amount for the same non-compliance with a new flock. The CA stated that although it was a second fine for the same violation the current legislation does not allow classifying it as a second identical violation, and increase the fine, as long as the previous fine was paid within the 60 days legally allowed. Since the excess number of laying hens present in the cages produces in approximately two weeks enough eggs to pay for the fine the sanctions applied are still not dissuasive.
- Discussions are still ongoing at central level concerning the strategy to be used from January 2012 with regards to non-compliant holdings with laying hen in unenriched cages. In the meantime in a note dated 22/7/2011 (sent to all the regions with copy to other official bodies concerned and to all the main poultry producers associations) the CCA has requested that the regions intensify their control over these farms and apply the maximum sanctions possible (including criminal ones if situations found could be classified as mistreatment of animals) from January 2012.
- Subsequent to the above note a letter signed by several laying hen producers associations was received by the CCA in October 2011. The letter requested clarification on whether while switching over their unenriched cages to enriched cages (under a government approved financing programme requiring these modifications to be made by 31/12/2014) they would be allowed to continue operations after 1/1/2012 and restock their unenriched cages at the same density as allowed for enriched cages with only administrative fines being issued. The CCA replied that from January 2012 the use of unenriched cages is forbidden and therefore their restocking is illegal.
- The CCA note of 22/7/2011 also calls the attention of the regions to use the information received concerning restocking of laying hen farms with enriched cages to ensure that they comply with maximum stocking densities.
- In Veneto region the audit team was informed that, subsequent to the worldwide problems with avian influenza, a Veneto Regional Decree number 311 of 15/6/2005 was issued making it mandatory for all poultry producers to notify the veterinary authorities of their intent to restock their farms (detailing the number of birds) at least 24 hours prior to such restocking. The same requirements apply at national level based on a Ministerial Decree dated 26/8/2005.
- In Veneto the regional level has used this information, extracted from the comprehensive regional database, to compile a specific list of farms with unenriched cages and respective dates of restocking. Therefore the region has a constantly updated list of laying hen farms with the latest date of restocking of their unenriched cages from which it can identify the ones with a probable higher risk of non-compliance from 1/1/2012. At the time of the visit 56 farms in the region still had laying hens in unenriched cages with 14 of them expected to be fully compliant by January 2012, 8 expected to stop operations and 34 that had not yet stated their intentions.

Recommendation six of report 2010-8388 requested the CCA to take measures to ensure that as already requested in a previous FVO recommendation from 2005, action is taken at regional level to prohibit the practice of forced moulting which is not in accordance with the requirements of Article 3 and point 3 of the Annex to Dir. 1999/74/EC and point 14 of the Annex of Dir. 98/58/EC.

In its initial response the CCA stated that by February 2011 a note would be sent to the regional authorities reminding them of the need, depending on the case, to lay down rules, apply penalties or suspend the activities of any farm where official checks uncover the practice of forced moulting and

that the need to verify the implementation of this practice in the audits carried out by regions on the performance of the local health authorities would be emphasised. Later on the CCA decided that since when carrying out sectoral audits on animal welfare in the regional systems it would systematically check the practice of forced moulting in laying hen farms and the measures taken by the veterinary services if they encountered this practice, such a note was not necessary and specific recommendations would instead be made in the respective audit report.

- Two CCA sectoral audits from 2011 (see also section 5.1, second bullet point), for two regions other than the ones visited by the audit team, reported that those regions are still not auditing the AUSL on this point, and that forced moulting was performed and the AUSL are still not taking enforcement actions against it. The reports in question are at the draft stage and contained no recommendations as yet.
- One AUSL in Emilia Romagna confirmed that forced moulting is known to occur but that under the existing legal framework it is extremely difficult to successfully attempt to prosecute it in court unless an OV is physically present in the farm at the time of the forced moulting. It is then possible for that OV to testify that the forced moulting was personally witnessed by an official authority and not based exclusively on documentary evidence for which the keeper could provide alternative explanations that a judge might accept. One such prosecution for forced moulting (under criminal law and not solely administrative) was initiated in November 2009, after an OV when visiting a laying hen farm in October 2009, saw very poor physical condition of the laying hens, high mortality, a total absence of provision of feed, no eggs being laid and presence of large numbers of feathers. A first hearing for this case has only recently been heard with the operator having been called to answer the court in December 2011.

Recommendation seven of report 2010-8388 requested the CCA to take measures to ensure that changes to registered data on establishments keeping laying hens are updated without delay as required by Article 1.4 of Dir. 2002/4/EC.

In response the CCA stated that by 31 January 2011 a note would be sent to the regional authorities reminding them to update without delay the register of establishments keeping laying hens.

- The note in question was sent in August 2011.
- A printout dated April 2011 of data from the national database concerning a laying hen farm visited in Emilia Romagna overstated by 50% the reality on site concerning the total number of houses, the maximum capacity and their total area. However, data currently in the national database correctly stated the number of houses and total capacity (total area still incorrect).
- The printout of the database with information on the laying hen farm visited in Veneto correctly stated the maximum capacity of the farm as seen on site.

Conclusion

There was a good frequency of controls over laying hen farms, provision of animal welfare training to OVs and satisfactory detection of shortcomings. An obvious improvement was demonstrated in this regard, satisfactorily addressing this part of recommendation one of report 2010-8388.

Procedures for controls did not adequately facilitate an assessment of perches for laying hens.

The Veneto region has established a good system for easier identification of non-compliant (unenriched cage) laying hen farms from January 2012 by using the information in its database.

The proposed amendment of the sanctioning regime has not been approved yet and sanctions for overstocking of laying hen farms are still not dissuasive. Recommendation four of report 2010-8388 has not been satisfactorily addressed in this regard.

Sanctions against the practice of forced moulting are either not applied at all or very rarely attempted. Recommendation six of report 2010-8388 regarding this practice has also not been satisfactorily addressed and the CCA action has been unable to obtain adequate reaction from the regions and AUSL for a problem for which the FVO has been requesting corrective action since 2005.

The national laying hen establishment register correctly identified the maximum capacity in number of birds in the establishments visited therefore indicating that recommendation seven of report 2010-8388 has been satisfactorily addressed.

5.2.2 *Broiler farms*

Legal requirements

Article 7.1 of Directive 2007/43/EC requires the CA to carry out non-discriminatory inspections on an adequate proportion of animals within each Member State to verify compliance with the requirements of this Directive.

Findings

- Dir. 2007/43/EC has been transposed into Italian legislation by legislative decree n. 181 of 27 September 2010. An implementing Ministerial decree for this legislative decree has not been issued yet and the corresponding draft proposal was sent by the CCA for Ministerial decision on 13/10/2011.
- Until the implementing Ministerial decree is issued the use of stocking densities above 39 kg/m² is not allowed. For densities between 33 and 39 kg/m² some interim measures have been provided in MH note No. 3550 of 25/2/2011, including what is considered acceptable as animal welfare training of the operators in the absence of an official programme.
- The four main broiler producing provinces in Emilia Romagna agreed between them on a harmonised procedure for approval of stocking densities above 33 up to 39 kg/m². This procedure requires a formal approval of that higher density, based on the application provided by the operator, and the audit team saw such an application. All required information according to Dir. 2007/43/EC was included in the application and formal approval had recently been issued.
- There was a high frequency of inspections of these farms since 2010 with both regions above the 10% minimum frequency required by the national control plan for animal welfare for 2010.
- In the broiler farm visited in Emilia Romagna shortcomings had been noted by the OVs in a previous visit, followed up, and the operator had addressed them within the imposed deadlines. The broilers were generally in a satisfactory condition and no shortcomings were noted by the OVs or the audit team during this visit.
- The OVs in Emilia Romagna did not possess equipment to measure NH₃ and CO₂ concentrations nor light intensity. In the farm visited the operator carried out his own

measurements of NH₃, CO₂ and light intensity.

- In Veneto region the OV's did have this equipment and satisfactorily demonstrated their use.
- The broiler farm visited in Veneto had not been visited yet for verification of compliance but had submitted a formal notification for a production density above 33kg/m² and was operating at that higher density. During the visit the OV's performed an assessment of the relevant animal welfare requirements as compared with the notification submitted by the operator. The OV's used a draft checklist (under development at central level) as a guidance tool. The assessment was performed in a professional way with attention being paid to structures, physical condition of the birds, and operations. Almost all legal requirements were assessed except for the requirement concerning additional data to accompany these birds (point 1.1 of Annex III of Dir. 2007/43/EC) when sent to the slaughterhouse, and the requirement concerning points 3 (b) and 3 (c) of Annex II of Dir. 2007/43/EC (temperature and humidity inside the house in case of either high or low temperatures outside) that had in both cases also not been included in the draft checklist.
- Other than the two above mentioned points no shortcomings were noted by the audit team during this visit and the broilers were generally in a satisfactory condition. However, the type of production with a movable physical separation inside the house between females (sent for slaughter several days before the males) and males had not been indicated in the blueprints of the houses sent with the notification. This had not been noted by the OV's and therefore even though the overall house density had been correctly calculated and could be shown to not exceed 39kg/m², the density for the part of the house with males and the part of the house with females had not been evaluated separately. Due to the lack of this data it also could not be guaranteed that during the last days prior to sending the females for slaughter (when the overall density neared the 39kg/m² limit) the density had not exceeded the limit in the separate parts of the house (either the male or the female side).

Conclusion

The full implementing legal basis for Directive 2007/43/EC is not published yet and the control system is still being developed. Nevertheless the official controls were generally satisfactory and no major non-compliances were detected by the audit team. However, the CA lack equipment to measure environmental parameters and cannot sufficiently assess certain requirements as a result. The procedures for control of broiler farms were insufficient to correctly calculate the stocking density where the flock within a building was subdivided.

5.2.3 Pig farms

Legal requirements

Article 8.1 of Directive 2008/120/EC requires the CA to carry out inspections on a representative sample of the different rearing systems.

Findings

Recommendation one of report 2010-8388 requested the CCA to take measures to ensure that staff performing official controls on pig farms receive clear guidance and interpretation to enable them to effectively enforce legislative requirements.

In response the CCA stated that by September 2010 it would send two notes to all the regions and the National Reference Centre for Animal Welfare requesting respectively correct performance of

official controls on pig farms and that from 2011 new training courses for OV's must pay particular attention to the correct performance of official checks. In addition a restructuring of the MH website would make it easier, from January 2011, for officials to access existing information notes and Ministerial instructions.

- The two above mentioned notes have not been sent.
- In both regions (and for all species) the control procedures state that if non-compliances are detected and a prescription for their correction issued a verification visit at the end of deadline is mandatory. Documented evidence and/or database data shown to the audit team could demonstrate that this requirement had been respected.
- There was a very high frequency of pig farm checks in Emilia Romagna (almost 50% of pig farms) with a lower but still high frequency in Veneto (close to 20%) with both regions largely exceeding the 10% target foreseen in the national control plan for animal welfare for 2010.
- The OV's met had received training on the welfare of pigs but not within the last 3 years.
- A pig finishing farm visited in Emilia Romagna had been sanctioned for not correcting deficiencies on time. It then initiated corrective measures and fully addressed them with no further shortcomings detected during a visit in July 2011. However, during the FVO visit there was insufficient manipulable material present and the operator stated that the amount present on the day was normal. The concrete slatted floor in some pens also had gaps bigger than the maximum allowed. The OV stated that he was aware of this but no mention had been made of it in the inspection reports.
- The pig farm visited in Veneto with a full production cycle had also been sanctioned for not correcting deficiencies on time and had subsequently corrected them. The most recent animal welfare control made in December 2010 stated that no animal welfare deficiencies were present. However, on the day of the FVO visit the OV's carried out an inspection and correctly identified several shortcomings present e.g.: overstocking in pens with pigs weighing more than 110kgs, insufficient manipulable material and some maintenance shortcomings. Other than possibly maintenance, the shortcomings reported on this day were not new.
- In general the condition of the animals was satisfactory in both farms.

Recommendation two of report 2010-8388 requested the CCA to ensure that documented procedures, as required by Article 8 of Reg. 882/2004, are revised to provide sufficient guidance to inspectors to assess the requirements of Dir. 2008/120/EC on manipulable material, high energy and fibre requirements in feed for dry sows and gilts, and the procedures to be followed to permit tooth grinding and tail docking.

In response the CCA stated that the research programme for 2010-2012 would look into these matters and that from June 2011 work would be started on the development of appropriate guidelines, including for tail docking and tooth grinding, for veterinarians carrying out official checks.

- A draft guidance on high fibre feed for sows is under discussion between the CCA and pig producers associations.
- In October 2011 a research project was initiated concerning the provision of high fibre and high energy feed to dry pregnant sows and gilts.
- A research project on manipulable material, in order to prevent the need for tail docking and tooth grinding, is prepared but not initiated yet due to funding difficulties.

- Tail docking was systematically performed in the pig farm with a full production cycle (the finisher farm received all pigs with approximately 40kg weight and already tail docked) but not tooth grinding. The private veterinarian of that farm stated that several attempts had been made to avoid tail docking but these had always been unsuccessful.
- Both regions had information in their respective databases concerning the number of pig farms that already complied, or not, with the requirement of paragraph 4 of Article 3 of Dir. 2008/120/EC to keep sows and gilts in groups, which becomes mandatory from 1 January 2013.

Conclusion

There was a good frequency of controls over pig farms and an improvement on the detection of shortcomings. However, there has been no recent provision of animal welfare training to OV's and most of the shortcomings noted during the FVO visits to the farms should have already been notified during previous visits. Although an improvement was seen this part of recommendation one of report 2010-8388 cannot yet be considered fully addressed.

Guidance is being developed and research projects to issue other guidance have been initiated or are being prepared. Action is under way to address recommendation two of report 2010-8388 concerning breeding sows and mutilations carried out on piglets, but it will still take some time (possibly years) to adequately address it.

5.3 TRANSPORT

5.3.1 Authorisation of transporters

Legal requirements

Article 10 of Regulation (EC) No 1/2005 lays down the requirements for authorising transporters carrying out journeys of up to eight hours. In particular, the applicants must demonstrate that they have sufficient and appropriate staff, equipment and operational procedures to comply with this Regulation and that they do not have records of serious infringements of Community legislation and/or national legislation on the protection of animals in the three years preceding the date of the application.

Article 11 of Regulation (EC) No 1/2005 laying down the provisions for authorising transporters carrying out long journeys, in addition to the documentation mentioned in Article 10, requires further documents, such as the certificates of approval of vehicles, procedures to trace and record the movements of vehicles and to contact drivers, a contingency plan in the event of emergency, and the certificates of competence for drivers and attendants.

Article 13 of Regulation (EC) No 1/2005 requires the competent authority to record authorisations in a manner enabling the competent authority to identify transporters rapidly, and to make publicly available the name and authorisation number of transporters authorised for long journeys, during the period of validity of the authorisation.

Findings

Recommendation eight of report 2010-8388 requested the CCA to take measures to ensure that as already requested in FVO recommendations from 2007 and 2008, procedures for the authorisation of transporters comply with all the requirements of Articles 10 and 11 of Reg. 1/2005.

In response the CCA stated that by 31 January 2011, all the regions would be sent a ministerial note reminding them of the need to ensure that the issue of authorisations for transporters making long

journeys is dependent on the existence of contingency plans, as indicated in the guidelines on the procedures for the authorisation of transports and the approval of means of transport included in the State-Regions Agreement of 21 May 2008. Moreover, by June 2011, the Ministry of Health would draw up contingency plans to be published on its website.

- The above mentioned Ministerial note has not been issued yet. Nevertheless the CCA has made available a generic transport contingency plan in its website.
- The list of transporters authorised for long distances, covering all 19 regions and the two autonomous provinces, is now available online via a link on the CCA website.
- In Veneto no withdrawal of transporters authorisations had occurred in recent times. In Emilia Romagna the audit team was informed that the AUSL notifies the region immediately of transporter authorisation withdrawals if the withdrawal is done at the initiative of the AUSL. However, if the withdrawal is made at the request of the transporter then such a notification is made only when the regional level specifically asks for an update of the lists.
- Four transporters had their authorisations withdrawn in Emilia Romagna. Two of them are still listed in the national database as having valid authorisations, including one that the AUSL had notified immediately to the region, and was notified by the region to the CCA in 13/6/2011.
- In both regions the two AUSLs visited for transport checks provided the audit team with printouts of their listings of transporters authorised by them which had been subjected to sanctions. Sanctions imposed by the *Polizia Stradale* (police performing road side checks) are notified to the authorising AUSL who is responsible for following them up. However, sanctions proposed by one AUSL in 2010, on a transporter authorised by another AUSL, had not been notified yet to the authorising AUSL because the sanctions were under court appeal and therefore no official notification could be made due to legal restrictions.
- Under an agreement between an AUSL in Veneto and a slaughterhouse operator (see also section 5.3.4) bovine animals arriving at the slaughterhouse unable to stand up and therefore not fit for transport according to Annex I, 2 (b) of Reg. (EC) No 1/2005, were not reported by OVAs in that slaughterhouse to the AUSL that granted the authorisation to the transporter. This is not in compliance with Article 26, 2 of Reg. 1/2005 nor with a MH note of 25 March 2009.

Conclusion

The part of recommendation eight of report 2010-8388 concerning procedures for the approval of transporters has been adequately addressed. However, the list of authorised transporters is not being updated in a timely manner and one AUSL is not complying with the requirement to notify infringements without delay to the competent authority which granted the authorisation to the transporter. This does not allow the transporter's authorising AUSL to investigate infringements and take enforcement action where necessary.

5.3.2 Approval of means of transport

Legal requirements

Article 18.3 of Regulation (EC) No 1/2005 requires the competent authority to record the certification of approval of means of transport by road for long journeys in an electronic database in a manner enabling them to be rapidly identified by the competent authorities in all Member States, in particular in the event of failure to comply with the requirements of this Regulation.

Findings

Recommendation eight of report 2010-8388 requested the CCA to take measures to ensure that as already requested in FVO recommendations from 2007 and 2008, recording of approved means of transport is put in place in compliance with Article 18.3 of Reg. 1/2005.

In response the CCA stated that in its note No 6620 of 10 April 2010, the Ministry of Health initiated the collection of data on authorisations of means of transport which, when completed, will be integrated into the existing database of transporter authorisations on the Ministry's website.

- A regional approval procedure (based on national guidelines) for the approval of means of transport is in place. The system of approvals of means of transport demonstrated to the audit team covered all relevant requirements. Nevertheless the OV performing the approval had to trust the manufacturers' specifications concerning ventilation capacity of the trucks due to lack of guidance on how to assess it in practice.
- Records from the satellite navigation system (SNS) were available in the transporter's office visited for all of his approved long distance means of transport.
- Each AUSL keeps a list of the means of transport that it has authorised and to which transporter they are linked.
- Unlike the list of transporters now available in the MH website, the planned integration of the data on means of transport into the transporters' database on the MH website has not been done.

Conclusion

The procedure for approval of means of transport is not sufficiently comprehensive to ensure that the requirements of Regulation (EC) No 1/2005 concerning ventilation are adequately assessed.

The information concerning means of transport is available at AUSL level but a list of approved means of transport is still not available in a way that enables the means of transport to be rapidly identified by the competent authorities in all Member States as required by Article 18.3 of Regulation (EC) No 1/2005. The part of recommendation eight of report 2010-8388 on means of transport has been partly addressed.

5.3.3 Checks on transport

Legal requirements

Article 27.1 of Regulation (EC) No 1/2005 requires the competent authority to check that the requirements of this Regulation have been complied with by carrying out non-discriminatory inspections of animals, means of transport and accompanying documents. Such inspections must be carried out on an adequate proportion of animals transported each year within the Member State.

Article 14.1(a) (ii) of Regulation (EC) No 1/2005 requires that the CA of the place of departure shall carry out appropriate checks to verify that the journey log submitted by the organiser is realistic and indicates compliance with this Regulation.

Article 15.1 of Regulation (EC) No 1/2005 requires the competent authority to carry out at any stage of the long journey appropriate checks on a random or targeted basis to verify that declared journey times are realistic and that the journey complies with this Regulation and in particular that travel times and rest periods have complied with the limits set out in Chapter V of Annex I. Article 15.4 of the same regulation states that the records of the movements of the means of transport by road obtained from navigation system may be used for carrying out these checks where appropriate.

Findings

Recommendation one of report 2010-8388 requested the CCA to take measures to ensure that staff receive appropriate training as required in Article 6 of Reg. 882/2004 to ensure that: effective checks are performed on journey logs as required by Article 14 of Reg. 1/2005.

In response the CCA stated that it would issue a note to all the regions and to the National Reference Centre for Animal Welfare by the end of September 2010 to ensure that the training programme for official veterinarians places special emphasis on the correct performance of checks on journey logs.

- The CCA has not drafted the note referred to in their response to recommendation one of report 2010-8388.
- Both regions visited had provided training to AUSLs on transport but not within the last four years. In Emilia Romagna the OVs in one slaughterhouse had received specific training on checking journey logs, whereas an OV in another slaughterhouse had not received training on verification of tachograph or SNS records even though she was responsible for, and had carried out, official controls on 10% of long distance transport which requires these tasks to be performed. Additional verification of journey logs and SNS records was stated to be carried in the same AUSL by trained OVs working in the animal welfare sector.
- The national control plan for animal welfare requires official controls (including checks on journey logs) on 10% of long distance transports arriving at slaughterhouses. These controls were reviewed in one slaughterhouse in Emilia Romagna. The frequency of controls was correct and documentation reviewed had been satisfactorily assessed with copies of all relevant information on file e.g.: journey logs, certificates of competence, transporter authorisations, tachograph and temperature printouts and SNS records. Action had been taken to obtain SNS records when these had not been initially available on the spot with satisfactory results.
- In one assembly centre all five consignments of calves dispatched to the Netherlands in the second half of 2011 had journeys approved as requiring the maximum legally allowed travelling time of 19 hours. However, returned journey logs showed that all five journeys took a minimum of between 20 to 21.45 hours. The Italian authorities explained that based on point 1.8 of Chapter V of Annex I to Reg. 1/2005 (providing for a two hour extension of the maximum travelling time) in the interest of the welfare of the calves they accepted that these journeys could have an extended travelling time instead of imposing a 24 hours rest stop in the journey. Nevertheless in the case of these specific long journeys to the Netherlands it was obvious from the returned journey logs that the two hour extension was not an exception but reflected instead the real journey time. The approved section 1 (Planning) of each of these journey logs did not indicate the realistic journey time; in addition verification that all necessary precautions had been taken to avoid any further delays (and that a contingency plan was in place in order to allow unloading and resting of the animals while en route in case of delays occurred during the journey) had not been considered at the time of approval.
- The MH has signed a Memorandum of Understanding (*Protocollo d'Intesa*) with the Ministry of Interior (already available on the MH website). It will be formally distributed soon and it establishes between the MH, (including UVACs and AUSLs), and Ministry of the Interior (police) principles regarding the future planning, conduct and communication of results, of inspections carried out on animal welfare during transport by these services. The intention is to initially analyse the results of inspections and then design a single focused, risk based annual plan of transport inspections. The MH is planning new training courses in

2012 for all the implementing services aimed at harmonising how roadside checks are conducted.

- Both regional transport police services met are carrying out a regular plan of inspections on animal transport in their regions (see also section 5.3.4). Enforcement actions are being taken when deficiencies are detected and this information is communicated to AUSLs, regions and the MH. In the case of international transportation, police inform the UVACs directly who may assist in dealing with these cases. Fines are levied on the spot and vehicles and drivers are detained until the sanctions are paid.

Conclusion

Checks of journey logs seen had been correctly performed and at the prescribed frequency in one slaughterhouse visited. However, other OV's performing those checks had not all undergone appropriate training and therefore were not aware of how to fully implement these checks. In addition in the case of consignments of calves from one assembly centre to the Netherlands the CA was stamping journey logs with unrealistic journey times which is not in compliance with Article 14.1(a) (ii) of Regulation (EC) No 1/2005. This part of recommendation one of report 2010-8388 cannot be considered fully addressed.

Police controls in both regions visited were very effective in detecting and sanctioning shortcomings with animal welfare during transport.

5.3.4 Fitness of animals

Legal requirements

Article 3 of Regulation (EC) No 1/2005 requires that animals are transported in a way unlikely to cause injury or undue suffering to them, and that animals are fit for the journey. Article 6.3 requires transporters to transport animals in accordance with the technical rules set out in Annex I to this Regulation.

Article 12 of Council Directive 93/119/EC requires injured or diseased animals to be slaughtered or killed on the spot. However, their transport may be authorised by the competent authority provided that such transport does not entail further suffering for the animals.

Regulation (EC) 854/2004, Annex I, Section I, Chapter II C requires the official veterinarian at slaughterhouses to verify compliance with EU rules on animal welfare during transport.

Findings

Recommendation three of report 2010-8388 requested the CCA to take measures to ensure that appropriate actions are taken and applicable sanctions are implemented when non-compliances are identified as required by Articles 54 and 55 of Reg. 882/2004, in particular in relation to the transport of unfit animals and the use of misleading or false certification in this matter.

In response the CCA stated that its note No 9654 of 25 May 2009, the Ministry of Health already drew the attention of the veterinary services of the regions and autonomous provinces to the need for closer monitoring of the fitness of animals for transport, both in loading areas and on arrival at the slaughterhouse. Additionally the CCA stated that by June 2011, it would tackle this problem directly with the *Federazione Nazionale degli Ordini Veterinari* (FNOVI - National Federation of Professional Associations of Veterinarians) to establish both the legal instruments currently available to prosecute veterinarians who issue false or misleading certifications and a procedure to which an official veterinarian must adhere if false or misleading certifications made by public or private veterinarians are encountered.

- The MH has not yet met the FNOVI nor agreed on a date to meet them.
- Regional and AUSL veterinarians in both regions acknowledge that there is a problem with the transport of unfit cull cows to slaughterhouses. Both stated that the main factors involved are:
 - a lack of sufficient training for both private practitioners and farmers; the need for a cultural shift in the attitude of farmers, private practitioners and some slaughterhouse owners; the lack of suitable slaughterhouses willing to accept dead bovine animals emergency slaughtered on farm; the difficulties facing OV's in taking enforcement action when animals arrive down at the slaughterhouses and the legal responsibilities under Italian law which define the farmer and transporter as culpable but do not mention the role of the private practitioner in providing the certificate enabling animals to be transported which in certain cases are not fit.

In response to these challenges the regional authorities have taken the following actions:

- Emilia Romagna monitored the transportation of dairy cows and their arrival at slaughterhouses during 2007 and provided training for official and private veterinarians for on-farm slaughter in May 2009 including a short training session to private practitioners on animal welfare on dairy farms and during transport. The regional level assisted the setting up of an on-farm slaughter service in the Province of Parma through the provision of technical and legal advice. Information on the service is available on the agricultural section of the Province of Parma's website.
- Veneto region stated that they organised meetings in 2005 and 2006 with the regional veterinary association to give them information on the suitability of animals for transport. Similar meetings were said to have taken place between AUSLs and local practitioners. In December 2009, training was provided to farmers by the Region's Directorate of Agriculture on the welfare of dairy cattle, including elements relating to cull cows, and critical control points in their transport. A course on general animal welfare and ethics in the veterinary profession was held in May 2011 which was open to private practitioners.
- In addition to emergency slaughter on farm the Veneto region has been subsidising (25%) since 2008, together with the Ministry of Agriculture (50%) the provision of insurance policies for dairy farmers that include the possibility for compensation for on farm slaughter due to welfare reasons, as well as for animal health and accident provision and to cover the cost of rendering. The uptake and funding of these policies are reviewed on a periodic basis. No such system of insurance exists in Emilia Romagna.

Checks on the fitness of animals during transport

The audit team reviewed the reports of checks on transport supplied by the road police in both regions:

- Police in Emilia Romagna reported that in 2010 they carried out 198 controls (37 with OV's from AUSLs) on 280 vehicles and detected 30 non-compliances resulting in 20 reports. Between January and 31 October 2011 the police conducted 161 controls (24 with OV's from AUSLs) on 250 vehicles and detected 24 non-compliances resulting in 23 reports. A more detailed breakdown of the results of these checks was not available but the police stated that in the three Provinces of Piacenza, Modena and Reggio-Emilia roadside checks in 2011 were carried out once or twice per month and detected non-compliances with the fitness of animals being transported in approximately 25% of consignments of bovines inspected. The figures for pigs and equines were 30% and 33% respectively for both documentary and

animal welfare non-compliances.

- Police in Veneto reported that in 2010 out of 57 vehicles controlled during roadside checks carried out by police 17 animal welfare offences were detected in 7 vehicles and one of these was a downer cow. In 2011 the numbers were: out of 149 vehicles controlled 79 animal welfare offences were detected in 28 vehicles with 7 downer cows in 5 of these vehicles. The police levied sanctions on offenders in all cases and copied details of their actions to the AUSLs of origin, relevant UVACs and the MH.
- Combined controls carried out with the local AUSL (where the OVs perform the welfare inspections instead of the police) found that in 2010 out of 46 vehicles controlled there were 6 animal welfare offences detected. In 2011 there was one animal welfare offence detected in 23 vehicles checked. There were no additional details available on these cases.
- It is noteworthy that the rate of detection of animal welfare non-compliances by the Venice police acting alone is far higher than when the AUSL are carrying out the animal welfare controls in joint inspections:

	2010	2011
	Rate of detection (number) of animal welfare non-compliances detected/total number of vehicles inspected	Rate of detection (number) of animal welfare non-compliances detected/total number of vehicles inspected
Venice police	30% (17/57)	53% (79/149)
Venice police + AUSL	13% (6/46)	4.3% (1/23)

Checks on the fitness of animals arriving at slaughterhouses

- The audit team visited one slaughterhouse in each region and reviewed the procedures and statistics relating to the transport and arrival of unfit animals at these slaughterhouses.
- The first slaughterhouse visited received 2692 bovines (out of a total of 35,000 dairy animals) between 1 January and 31 October 2011 accompanied by certificates signed by private practitioners stating that the animals had mild conditions but were fit for transport. The OVs took enforcement action for four cases out of this population of 2692 “vulnerable” animals transported under fitness certificates, of which three cases were reported to the local Professional Association of Veterinarians and the police for further investigations.

A review of approximately 10% of these certificates found diagnoses described for which the audit team has serious doubts about whether animals transported with such diagnoses could be transported without causing undue suffering (Art. 3 of Regulation (EC) No 1/2005) to the animals e.g. many animals described as lame, diagnosed with conditions of joint sub-luxation, and adductor muscle damage. The audit team found the rate of enforcement action of 0.0015% (4/2692) taken for animal welfare offences for this class of animal as not credible, especially when compared with the statistics for detection of animal welfare non-compliances in the transport of bovines by police in both regions. The OVs stated that there were difficulties with taking enforcement action and that private practitioners had not received sufficient training to decide on the suitability and fitness of cull cows for transport.

- The second slaughterhouse visited receives approximately 25,000 bovines per year, of which approximately 15-16,000 are cull cows. The slaughterhouse receives approximately 210

animals which are unable to walk unaided off their vehicles every year. The AUSL covering this slaughterhouse has decided that when downer cows arrive at the slaughterhouse they should be *ante-mortem* inspected on the vehicle and stunned on the spot. This means that no assessment is made of the animals capacity to walk unaided. These cases are then evaluated during *post-mortem* inspection which by itself may not establish if the animal was fit for transport at the time of loading or if the reason the animal was down was due to a transport injury.

The audit team assessed the *post-mortem* findings of 67 cases of downer cows stunned in the means of transport between 12 of September and 15 November 2011 and that had arrived without a certificate of fitness. In at least 3 cases the lesions detected during post-mortem would clearly have merited further official investigation but this had not happened.

In the Province covering this second slaughterhouse an agreement was made between the AUSL and the slaughterhouse operator that non-compliant downer animals would be reported by the OV's exclusively to the slaughterhouse operator who would then discuss the matter with the transporter or the farm/assembly centre of origin. This is not in compliance with Annex I, section II chapter I point 2, (b) of Reg. 854/2004 which requires the OV's at the slaughterhouse to notify back to the veterinarian attending the farm and, where appropriate, the competent authority responsible for supervising the holding of origin. It also does not comply with similar requirements in the MH note of 25 March 2009.

Conclusion

Recommendation three of report 2010-8388 has not been effectively addressed by the central nor the regional level though some action was taken in both regions either by assisting in the provision of emergency slaughter facilities or with subsidised insurance for dealing with injured animals.

All stakeholders acknowledge there is a problem in the main dairy regions of Northern Italy but no concerted action has yet been taken there to provide sufficient training, or targeted enhanced enforcement or communication between all the stakeholders involved, with the notable exception of the road police who make their inspections on a risk basis and have a far higher detection and enforcement rate than the veterinary services.

The documentary evidence seen at the two slaughterhouses visited would suggest that inspections of cull cows on arrival are not being carried out sufficiently rigorously to address the acknowledged problem of cows being transported which are not fit for transport and enforcement actions are therefore limited. In one slaughterhouse the CA has, in practice, delegated enforcement to the food business operator to improve the conditions of transport which are not in compliance with Articles 54 and 55 of Reg. 882/2004. Therefore no follow up of these cases is carried out by the official authorities responsible for supervising the holding of origin and no enforcement action taken.

6 OVERALL CONCLUSIONS

Obvious improvements were seen in some areas (supervision of laying hen and pig holdings, database of transporters and list of means of transport, and register of laying hen holdings) but in contrast with enforcement against transporters (strong sanctions by the police) there were very limited measures taken against private practitioners issuing misleading certificates of fitness for transport.

With regards to the long standing problem of forced moulting, noted by the FVO already since 2005, the regional authorities continue to fail to implement the measures requested by the CCA.

Four of the eight recommendations from 2010 can be considered mostly satisfactorily addressed with action initiated for two others. However, the actions taken by the CCA until now with regards to forced moulting have not obtained an adequate reaction from the regional level. In addition neither the CCA nor the regions have yet effectively addressed the issue of applying sanctions against private practitioners issuing false or misleading certificates for fitness for transport of cull cows.

As amendments proposed in 2010 for the system of sanctions against overstocking of laying hen cages have not been adopted and discussions are still ongoing at central level concerning the strategy to be used from January 2012 against non-compliant holdings with laying hen in unenriched cages, it is unclear what measures the CAs will apply regarding the use of unenriched cages after 1/1/2012.

7 CLOSING MEETING

A closing meeting was held on 18 November with representatives of the CCA. At this meeting, the main findings and preliminary conclusions of the audit were presented by the audit team. The representatives of the CA stated that they agreed with the findings presented and would try to effectively address all points indicated and particularly the ones concerning forced moulting and animals unfit for transport.

8 RECOMMENDATIONS

N°.	Recommendation
1.	The CCA should ensure that verification procedures as required by Article 8 of Regulation (EC) No 882/2004 are put in place and implemented so that the regional level verifies the effectiveness of the official controls performed by the AUSL in relation to animal welfare at farm and during transport, as already recommended by the FVO in 2007, 2008 and 2010.
2.	The CCA should provide documented procedures, as required by Art 8 of 882/2204, so that an assessment of perches for laying hens, as required by Article 4.1.(d) and 6.1.(d) of Dir 99/74, can be made.
3.	The CCA should ensure that sanctions for the enforcement of legislative requirements on laying hen premises are effective, proportionate and dissuasive as required by Article 55 of Regulation (EC) No 882/2004 in order to prevent the recurring overstocking of laying hen cages.
4.	The CCA should ensure that keeping laying hens in unenriched cages is effectively prohibited by 1 January 2012 as required by Article 5.2 of Directive 1999/74/EC.
5.	The CCA should take action to prohibit the practice of forced moulting since this has been requested in previous FVO recommendations since 2005 without effective results until now. This practice of forced moulting is not in accordance with the requirements of Article 3 and point 3 of the Annex to Directive 1999/74/EC and point 14 of the

N°.	Recommendation
	Annex of Directive 98/58/EC.
6.	The CCA should ensure that equipment is available to the OV's in all regions so that measurements of the necessary environmental parameters in the farms can be made as required in Article 10 (h) of Regulation (EC) No 822/2004.
7.	The CCA should ensure that documented procedures, as required by Article 8.1 of Regulation (EC) No 822/2004, for carrying out checks of broiler farms: clearly indicate the necessary data on mortality rates which has to be sent to the slaughterhouse (Annex III, 1 of Directive 2007/43/EC); the requirement concerning temperature and humidity inside the house in case of either high or low temperatures outside (points 3 (b) and 3 (c) of Annex II of Directive 2007/43/EC); and ensure that an accurate assessment of stocking density for broilers, as required by Article 3 of Dir 2007/43, can be made.
8.	The CCA should take further measures to ensure that staff receive appropriate training as required in Article 6 of Regulation (EC) No 882/2004 so that staff performing official controls on pig farms effectively detect and enforce legislative requirements.
9.	The CCA should take further measures to ensure that documented procedures, as required by Article 8 of Regulation (EC) No 882/2004, are revised to provide sufficient guidance to inspectors to assess the requirements of Directive 2008/120/EC on manipulable material, high energy and fibre requirements in feed for dry sows and gilts, and the procedures to be followed to permit tooth grinding and tail docking.
10.	The CCA should ensure that the list of authorised transporters now publicly available is updated in a timely manner to comply with the requirement or Article 13 of Regulation (EC) No 1/2005 that a competent authority can identify authorised transporters rapidly.
11.	The CCA should ensure that procedures for the approval of vehicles are further developed so that they include suitable instructions and guidance to assess the ventilation requirements of point 3.2. of Chapter VI of Annex I to Regulation (EC) No 1/2005.
12.	The CCA should ensure that, as already requested in FVO recommendations from 2007, 2008 and 2010, the certification of the approval of means of transport for long journeys is recorded in an electronic database enabling them to be rapidly identified by the competent authorities in all Member States as required in Article 18.3 of Regulation (EC) No 1/2005.

N°.	Recommendation
13.	The CCA should take further measures to ensure that staff receive appropriate training as required in Article 6 of Reg. 882/2004 to ensure effective checks on journey logs, and that the journey logs submitted by the organisers are only stamped if they are realistic and indicate compliance with Regulation (EC) No 1/2005 as required by its Article 14.
14.	The CCA should take appropriate actions and apply sanctions when non-compliances are identified as required by Articles 54 and 55 of Regulation (EC) No 882/2004, in particular in relation to the transport of unfit animals and the use of misleading or false certification in this matter.

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

http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_inspection_ref=2011-6048

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Dir. 2008/120/EC	OJ L 47, 18.2.2009, p. 5-13	Council Directive 2008/120/EC of 18 December 2008 laying down minimum standards for the protection of pigs
Dir. 98/58/EC	OJ L 221, 8.8.1998, p. 23-27	Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes
Dir. 1999/74/EC	OJ L 203, 3.8.1999, p. 53-57	Council Directive 1999/74/EC of 19 July 1999 laying down minimum standards for the protection of laying hens
Dir. 2007/43/EC	OJ L 182, 12.7.2007, p. 19-28	Council Directive 2007/43/EC of 28 June 2007 laying down minimum rules for the protection of chickens kept for meat production
Reg. 1/2005	OJ L 3, 5.1.2005, p. 1-44	Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/97
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
Dir. 2002/4/EC	OJ L 30, 31.1.2002, p. 44-46	Commission Directive 2002/4/EC of 30 January 2002 on the registration of establishments keeping laying hens, covered by Council Directive 1999/74/EC
Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption

Legal Reference	Official Journal	Title
Dir. 93/119/EC	OJ L 340, 31.12.1993, p. 21-34	Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing