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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

IRELAND

FROM 12 TO 14 MARCH 2012

IN ORDER TO EVALUATE THE IMPLEMENTATION OF CONTROLS FOR ANIMAL
WELFARE OF LAYING HENS ON FARMS

Executive Summary

The CCA has taken satisfactory measures to implement the prohibition on the use of unenriched cages for laying hens after 1 January 2012.

Table of Contents

1	<u>INTRODUCTION</u>	1
2	<u>OBJECTIVES</u>	1
3	<u>LEGAL BASIS</u>	1
4	<u>BACKGROUND</u>	2
5	<u>FINDINGS AND CONCLUSIONS</u>	2
	5.1 <u>IMPLEMENTATION OF ACTION PLAN TO ACHIEVE COMPLIANCE WITH ARTICLES 3 AND 5 OF DIRECTIVE 99/74</u>	2
	5.2 <u>CHECKS ON LAYING HEN FARMS, EGG PACKING CENTRES AND WHOLESALER</u>	4
6	<u>OVERALL CONCLUSIONS</u>	5
7	<u>CLOSING MEETING</u>	5
8	<u>RECOMMENDATIONS</u>	5
	<u>ANNEX 1 - LEGAL REFERENCES</u>	6

ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

CA	Competent Authority
CCA	Central Competent Authority
EC	European Communities
TRACES	Trade Control and Expert System of the European Commission

1 INTRODUCTION

This audit took place in Ireland from 12 to 14 March as part of the planned audit programme of the Food and Veterinary Office (FVO).

A pre-audit meeting with the competent authorities of Ireland was held on 22 February 2012. At this meeting, the audit team confirmed the objectives and itinerary for the audit and requested additional information required for its satisfactory completion.

The audit team comprised two inspectors from the FVO. Representatives from the Department of Agriculture Food and the Marine, the Central Competent Authority (CCA) accompanied the audit team for the duration of the audit.

2 OBJECTIVES

The objective was to evaluate whether the Competent Authorities have achieved compliance with the legislative requirements laid down in Articles 3 and 5 of Council Directive 1999/74/EC as regards the implementation of the prohibition of the use of unenriched cages for laying hens after 1 January 2012.

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

Visits			Comments
Competent authority	Central	2	Pre-audit and final meetings
	County		None
	District		CA Staff involved in controls on laying hen farms, packing centres and wholesale premises were met at the premises visited.
Farms		4	Four laying hen premises in each of two Counties which had converted from using unenriched to enriched cages.
Packing centres		2	One egg-packing centre in each County supplied by the farms visited before 1 January 2012 and before this date also supplied by other premises using unenriched cages.
Egg Wholesaler		1	One egg wholesale premises.
			All sites were selected by the audit team.

3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation and, in particular:

- Article 45 of Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal

health and animal welfare rules;

- Council Directive 1999/74/EC of 19 July 1999 laying down minimum standards for the protection of laying hens;

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

4 BACKGROUND

Articles 3 and 5 of Council Directive 1999/74/EC laying down minimum standards for the protection of laying hens requires that Member States ensure the production of eggs from farms furnished with unenriched cages is prohibited from 1 January 2012.

The CCA informed the Commission services in its reply to EU Pilot 2734/11/SNCO of 20/12/2011 that they would be fully compliant on 1 January 2012.

5 FINDINGS AND CONCLUSIONS

5.1 IMPLEMENTATION OF ACTION PLAN TO ACHIEVE COMPLIANCE WITH ARTICLES 3 AND 5 OF DIRECTIVE 99/74

Based upon documentary review of information supplied by the CCA on 22 February 2012, the FVO audit team noted that:

- The Poultry Welfare Scheme was introduced on June 2010 under Ireland's Rural Development Programme 2007-2013. It provided for aid in the form of grants of 40 per cent of total costs of replacement for premises using unenriched cages. To date 32 applications have been approved with 20 refurbishments completed. Up to €16m was made available. Delays in producers' financing and supplies of materials have prevented full take up of grant aid. The closing date for completion of works is 29 September 2012.
- The CCA wrote to all egg producers on seven occasions: 14/4/2010; 28/1/2011; 4/8/2011; 10/11/2011; 28/11/2011 and 3/1/2012 to inform them of:
 - the deadline of 1/1/2012; funding; minimum specifications for enriched houses; a number of requests to update the laying hen register; reminders of the prohibition deadline and considerations regarding the restocking of unenriched cages as well as requests to complete questionnaires on future production activities.

The above consultations with other CCA departments and incoming applications for grant aid allowed the CCA to have detailed information on the potential compliance of farms with future requirements as the deadline of 1 January 2012 neared.

The CCA wrote to all egg retailers on 2 September 2011 and to all egg producers and packers on 5 December 2011 informing them of the forthcoming prohibition on the use of eggs produced in unenriched cages. It also met with the Irish Egg Association on October 2011 and the Irish Farmers' Association on November 2011 to discuss progress with the changeover to enriched cages.

- Statistics on the changeover from unenriched cages to enriched:

	2011		21st Feb 2012	
	No. Flocks	No. Birds	No. Flocks	No. birds
Alternative Systems	158	1,006,380	157	1,041,664
Unenriched Systems	79	1,169,218	0	0
Enriched Systems	5	258,722	25	1,370,464
Totals:	242	2,434,320	182	2,414,128

- In early 2011 79 farms still used unenriched cages. On 21 February 2012, 54 of these had been removed from the laying hen register. Of these, 14 asked to be delisted; 20 indicated they had no plans to convert and a further 20 did not reply to the CCA's final questionnaire sent on 3 January 2012. 25 farms now use enriched cages.
- The CCA decided to target 18 of these 79 flocks for on site inspections after 1 January 2012 to verify if producers' intentions indicated in the responses to questionnaires were reliable. Ten flocks were known to the CCA to be potentially non-compliant on 1 January 2012. An additional eight were selected based upon their previous compliance histories or on a random basis.

Specific checklists and guidance were issued to veterinary and technical staff to carry out the field inspections. The checklist asked for information on whether unenriched cages were still present on site and how they were to be disposed of: usually through recycling. In addition, information on the packing centres used by the premises was also sought which may prove useful in giving an overview of the trade in table eggs throughout the country.

The results of the on-site verification inspections for the 18 flocks were as follows:

- Five flocks fully depopulated by 1 January 2012
- Three flocks fully depopulated by 3 January 2012
- Nine flocks fully depopulated by 13 January 2012. Welfare Compliance Notices were issued to the owners of two of these flocks for rectification of animal welfare and hygiene issues
- One new enriched site operational

Depopulation was verified through on site confirmation; review of slaughterhouses intake records and TRACES certificates for those consignments sent for slaughter to Great Britain.

- There was a delay in depopulation of 3-13 days in the case of 12 out of 18 producers inspected which was due to the late booking of slots in slaughterhouses and the limited

slaughter capacity available due to the Christmas turkey market.

- The CCA wrote to two laying hen premises and the receiving packing stations which had not sent eggs from unenriched cages, laid after 1 January, directly for rendering as required. The CCA has not reported any additional action to be necessary to enforce the ban on the use of unenriched cages after 1 January 2012.
- The CCA intends to continue inspections on poultry premises during 2012 focusing on those premises judged to be at high risk of non-compliance and also to monitor the changeover to the new systems of egg production which will themselves give rise to challenges for the owners.

5.2 CHECKS ON LAYING HEN FARMS, EGG PACKING CENTRES AND WHOLESALER

The audit team noted that:

- The actions taken by producers and reported by the CA were confirmed on the spot to have been satisfactorily implemented in the four laying hen premises visited: houses with unenriched cages were seen to be either in a state of disuse or cages had been removed and awaited collection for scrap. New enriched cage houses had been put in place or were being built. The CA had prepared house profiles for all conversions and new installations using enriched cages. These were very useful, single page per house documents, which included measurements of all enrichment parameters e.g.: cage size, useable area perches, feeders, nests etc.

However, although information was available for almost all houses to calculate cage slopes, these had not been indicated on the forms. Subsequent calculations indicated that where measurements were present, the cage slopes were compliant. A small number of cage slope percentages remain to be calculated as some measurements were missing.

- One large commercial egg packing centre and one small on-farm egg packing centre were visited. In the larger premises there was a traceability system in place using pallet dockets with labels indicating: registration number of the delivering farm and of the house, date of lay, date of collection and number of eggs. This information was recorded in a computer system which prints a label for each pallet. Separate areas are used to grade and pack different classes of eggs. CA inspections included controls on traceability: cross checks of pallet details with stamps on eggs; correct stamping of "B" grade eggs. Farm registration numbers were missing on some of the labels on pallets but additional identifying details were present.

In the small on-farm packing centre, the owner had previously been a small producer-packer but was now buying stamped eggs for her customers (retail shops and bakeries) whilst her premises was being upgraded to use enriched cages. Minor deficiencies in recording the results of CA inspections were noted by the audit team and communicated to it.

- The egg wholesaler visited used only stamped class A eggs. Records kept on site and records of CA controls on these were satisfactory. However, hygiene conditions in the premises (a converted stable) did not conform to the conditions laid down in the CA's own hygiene inspection form.
- Although not within the defined scope of this audit, it was noted that the requirement in Article 5(3)b of Egg Marketing Regulation (EC) No 589/2008 for egg packing centres to have a device for measuring the height of the egg airspace was not included in the CA checklists and not mentioned in the tests carried out by the egg packing centres themselves.

6 OVERALL CONCLUSIONS

The CCA has taken satisfactory measures to implement the prohibition on the use of unenriched cages for laying hens after 1 January 2012. It has effectively verified its implementation through a series of on-site inspections which demonstrated the system put in place ensures that on 22 February 2012 there are no registered flocks using unenriched cages in Ireland and that Ireland fulfils its obligations under Articles 3 and 5 (2) of Council Directive 1999/74/EC.

7 CLOSING MEETING

A closing meeting was held on 14 March 2012 with representatives of the CCA. At this meeting, the main findings and conclusions of the mission were presented by the FVO team. The representatives of the CCA stated that they would ensure that the minor deficiencies noted by the audit team would be promptly rectified.

8 RECOMMENDATIONS

There are no recommendations as a result of this audit.

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
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
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