

RESPONSE TO DRAFT FVO MISSION REPORT DG (SANCO) 2013-6822**CA Comments - Received on 7 June 2013**

The UK has the following comments on the content of the draft FVO report marked by report section:

**Executive Summary / Section I
Paragraph 6**

See response to Recommendation 4.

5.2 LEGISLATION**Findings*****Bullet point 1, 2, 3, 4 (page 3)***

Historically, FAWC's role in the development of farm animal welfare codes has not been a formal one. However, a Standing Committee of FAWC has been established to provide independent scientific support in relation to Regulation 1099/2009 to, amongst other priorities, provide scientific opinions on guides to good practice developed for the purposes of the Regulation.

To note that it is Defra and the meat chicken industry in England, not FAWC, which plan to consult on the principle of changing the status of codes and the content of revised guidance on the welfare regulatory requirements for keeping meat chickens in summer 2013. It will be proposed in Defra's consultation that the FAWC will have an important role in assuring the quality of the guidance which will continue to assist in the enforcement of animal welfare provisions arising from CoE recommendations in the UK.

5.3.1 Reporting of results of checks in poultry slaughterhouses**Legal Requirements / Findings*****Bullet point 2 (page 4)***

For clarification, only carcass rejections which are 'farm-attributable' are used in the trigger system under the category of 'Total carcass rejections'.

Bullet point 1 (page 5)

For clarification with regard to FSA officials within slaughterhouses '*Specifically trained plant staff (Poultry Inspection Assistant PIA)*' can carry out PM inspections in certain abattoirs.

Bullet point 4 (page 6)

To clarify, if an OV assesses a level of FPD to be sufficiently high enough to warrant further investigation, he/she will score a sample of 100 birds from the batch and record the level of FPD observed. This does not necessarily result in an exception report. An exception report is generated when an issue (FPD or any other condition) is felt to be particularly severe and a breach of welfare legislation is suspected.

Bullet point 6 (page 6)

See **Appendix 1** which provides a flowchart outlining the reporting process for suspected breaches of animal welfare on the farm or during transport.

Bullet point 1 (page 7)

We recognise that the FSA/Defra/Industry scoring system used by OVs to score FPD differs from some of the scoring systems used by retailers/Quality Assurance schemes. Importantly, however, the Process 2 trigger level for FPD is based on scores recorded using the FSA/Defra/Industry scoring system, and it is not valid to compare the number of batches that would have exceeded this level if they had been scored using a different system since the scores used by different systems are not directly comparable.

Bullet point 3 (page 7)

It is important to note that, contrary to what this statement implies, trigger levels are not routinely adjusted in order to target 2% of batches. Trigger levels have only been amended once (August 2010), and this change was necessary because, due to the lack of data available prior to implementing the trigger system, it had not been possible to precisely calculate the number of trigger reports that would be generated.

Enforcement

Bullet point 4 (page 7)

For clarification, these data are provisional and are subject to change following final collation of the 2012 data set.

Sub-bullet point 5 (page 7)

To clarify, the “first 3 options” identified in this statement are not restricted to cases where “up to 5 previous trigger reports” have been generated since 2010; cases in this category can have any number of trigger reports generated prior to the preceding 3-month dataset.

5.3.2 Checks on Broiler farms / Findings

Bullet point 4 and 5 (page 9)

To clarify, the scheduled inspections include those for cross compliance for which a minimum of 1% of claimants of single farm payments with livestock must be inspected. Regional selection is not possible as the 3 GB devolved administrations each hold a single separate list of claimants (for England, Scotland and Wales) from which selection is made. This ensures that the highest risk farms are selected regardless of location geographically. If Regional selection was carried out it is possible that higher risk inspections might not take place in some Regions. In addition to those inspections issued by the central team to the Regional teams a relatively small number of inspections are issued during the summer to ensure new claimants may be selected for an inspection.

Bullet point 5 (page 10)

The Directive is silent on the frequency of monitoring environmental parameters such as CO₂ and NH₃ levels. The CA provides guidance to GB keepers that they take measurements of environmental parameters using a risk based approach and measurements are taken at points in the rearing cycle that pose the greatest risk to bird welfare. The CA thinks that measuring environmental parameters such as CO₂ and NH₃ at the frequency observed in the audit, (i.e. once a month, sometimes twice) if carried out during the time of maximal risk provides the assurance that the ventilation system is constructed and operated in such a way that meets the Annex III point 3 requirements.

5.5 VERIFICATION OF FARM INSPECTIONS

Findings

Bullet point 1 (page 13)

See response to Recommendation 3.