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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

THE UNITED KINGDOM

FROM 25 FEBRUARY TO 01 MARCH 2013

IN ORDER TO EVALUATE THE IMPLEMENTATION OF COUNCIL OF EUROPE
REQUIREMENTS FOR ANIMAL WELFARE IN MAJOR FARMED SPECIES AND OFFICIAL
CONTROLS ON CHICKENS KEPT FOR MEAT PRODUCTION

In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.

Executive Summary

This audit describes the outcome of a Food and Veterinary Office (FVO) audit which took place in the United Kingdom (UK) from 24th February to 1st March 2013.

The objective of the audit was to evaluate the implementation of EU animal welfare legislation regarding farm animals, in particular farms keeping chickens for the production of meat, and other species covered by the Recommendations from the European Convention for the Protection of Animals kept for Farming Purposes (hereinafter “CoE Recommendations”).

It was concluded that the UK has not fully implemented all the CoE Recommendations for major farmed species in legislation or through administrative measures such as the UK Welfare Codes of Recommendations but instead relies on commercial quality assurance (QA) schemes to fill the legislative gaps.

With respect to turkeys, which was the sector that was dealt with in some depth during this audit, the QA schemes often give greater guidance or prescriptive measures than those laid down in CoE Recommendations but these are not mandatory. The QA bodies do not carry out official controls and they are not audited by the Competent Authority (CA). The CA's reliance on QA schemes to fill the legislative gaps does not provide an assurance that the whole sector complies with all legal obligations.

The UK has put in place a well conceived and generally well implemented system for assessing and reporting on welfare indicators found at post-mortem in poultry slaughterhouses. Improvements in the welfare of chickens reared for meat are being targeted through the development of actions plans at farm level and graduated enforcement action.

It is not clear yet whether the system has been effective at raising the level of welfare on meat chicken farms but it has certainly generated enough information for the CA to be in a position to move more quickly in this direction. However, actions taken in response to exception reporting of severe welfare conditions found at slaughter noted by the audit team did not merit any visits or escalated enforcement action or feedback of information to the reporting OV's in the slaughterhouse visited and were therefore not fully effective.

The CA has a well developed and generally satisfactory system of official controls to implement the meat chicken Directive on farm which targets the majority of premises by risk analysis, both at the initial selection of farms for cross compliance inspections, and then as a result of information (triggers) received from slaughterhouse checks.

However, the absolute number of inspections visits arising from each of these risk targeting processes is relatively low in relation to the scale of production and the number of animals involved. Environmental parameters are not being adequately controlled due to the relatively low number of visits (and insufficient evidence obtained therefrom) and also because action plans (produced in response to post-mortem trigger reports) make no reference to these requirements of the Directive set down in national law.

Sufficient training for keepers of meat chickens, of a recognised standard, and provided within a national proficiency framework, is available to address the requirements of Article 4 of Directive 2007/43/EC.

The report makes a number of recommendations to the UK 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

AHVLA	Animal Health and Veterinary Laboratories Agency
CA	Competent Authority
CCA	Central Competent Authority
CDMR	Cumulative Daily Mortality Rate
CoE	Council of Europe
Defra	Department of the Environment Food and Rural Affairs
DG(SANCO)	Health and Consumers Directorate-General
DMR	Daily Mortality Rate
EC	European Community
EU	European Union
FPD	Foot Pad Dermatitis
FSA	Food Standards Agency
FVO	Food and Veterinary Office
GB	Great Britain
MS	Member State
OV	Official Veterinarian
QA	Quality Assurance
VO	Veterinary Officer
UK	United Kingdom

1 INTRODUCTION

The audit took place in the United Kingdom (UK) from 25th February 2013 to 1st March 2013 as part of the planned audit programme of the FVO. An opening meeting was held with the UK competent authorities on 25th February 2013. 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 was composed of two inspectors from the FVO and a national expert from Ireland, and was accompanied throughout the audit by a competent authority (CA) representative from the Animal Health and Veterinary Laboratories Agency (AHVLA).

2 OBJECTIVES

The objective of the audit was to evaluate the implementation of measures aimed at the control of animal welfare on farms, in particular farms keeping chickens for the production of meat, and other species covered by the Recommendations from the European Convention for the Protection of Animals kept for Farming Purposes (hereinafter “CoE Recommendations” [1]) with particular reference to turkeys.

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

Visits			Comments
Competent authority	Central	2	Opening and final meetings
	Regional	1	1 AHVLA regional office
	District	1	1 AHVLA sub regional office
Farms/ slaughterhouses etc		4	2 Commercial broiler farms and 1 commercial all year production turkey farm. 1 commercial poultry slaughterhouse. The sites were selected by the CA

3 LEGAL BASIS

The mission was carried out under the general provisions of Union legislation, in particular Article 45 of Regulation (EC) 882/2004. A full list of the legal instruments quoted in this report is provided in Annex 1 and refers, where applicable, to the last amended version.¹

4 BACKGROUND

This is the first such audit carried out by the FVO in the UK to evaluate the implementation of control measures on the keeping of chickens for the production of meat and on different species covered by CoE Recommendations and is part of a series of audits being carried out by the FVO in

1. http://www.CoE.int/t/e/legal_affairs/legal_co-operation/biological_safety_and_use_of_animals/Farming/

Member States.

5 FINDINGS AND CONCLUSIONS

5.1 COMPETENT AUTHORITY

5.1.1 Designation of Competent Authorities

Legal Requirements

Article 4 of Regulation (EC) No 882/2004 requires MSs to designate the CAs responsible for the purposes and official controls set out in the Regulation. It also lays down operational criteria for the CAs.

Findings

The audit team noted that:

- There have been changes in the structure and organisation of the CA in the period since the last FVO animal welfare audit in 2009. The revised organisation of the CA is described in the country profile of the United Kingdom, which is accessible at: http://ec.europa.eu/food/fvo/country_profiles_en.cfm.
- One of the CCA's (Department of the Environment Food and Rural Affairs- hereinafter Defra) delivery bodies, Animal Health, has merged with another, the Veterinary Laboratory Agency, to become the Animal Health and Veterinary Laboratories Agency (AHVLA);
- Field delivery function remains essentially similar to the system described in the previous FVO report (DG SANCO 2009-8268) but there has been a reported decrease in the number of veterinary and technical staff of approximately 30 per-cent between 2010 and 2013 (VLA and AH agencies had 2798: AHVLA now has 2220), a move to paperless offices, remote administrative support functions and new IT support and infrastructure systems. 12 former regional offices have been reduced to 6 regional business units in Great Britain (GB);
- The two field offices visited had different administrative support arrangements. The office with the administrative support function present on site could more easily deliver information required for the completion of the audit than the other office where resource constraints meant long waits for information or problems with printer queues.

Conclusion

The recent reorganisation and merger of two field agencies into AHVLA has resulted in fewer staff carrying out essentially the same tasks. However, difficulties in performing administrative functions in one office would indicate that more time is spent by VOs personally retrieving and processing paperwork where this could be more usefully spent carrying out increased numbers of field visits.

5.2 LEGISLATION

Legal Requirements

Council Decision 78/923/EEC concerning the conclusion of the European Convention for the Protection of Animals kept for Farming Purposes and Council Decision 92/583/EEC on the conclusion of the Protocol of amendment to the European Convention for the Protection of Animals kept for Farming Purposes have approved the Convention on behalf of the EU. Recommendations adopted under the Convention must be applied by the Member States, in national legislation or by

other administrative arrangements.

Findings

The audit team noted that:

- The Farm Animal Welfare Council has had an important role in the production of Codes of Recommendations which are used by the UK authorities to assist in the enforcement of animal welfare provisions arising from CoE Recommendations. Its role as an advisory Non-Departmental Public Body ended on 31 March 2011. It was reconstituted as an expert committee (Farm Animal Welfare Committee (FAWC)) and has provided advice, to Defra and the Scottish and Welsh Governments on farm animal welfare issues since 1 April 2011. There is no change to the legal status of FAWC's output. Defra and the meat chicken industry in England, 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 2013²;
- CoE Recommendations for animal welfare in major farmed species are implemented in the UK through a combination of national legislation, FAWC welfare codes and industry-led non-mandatory quality assurance (QA) standards. The CA cites broader UK Government policy on "earned recognition" and "accepted good practice" as the reason for accepting accredited QA schemes as a suitable way to monitor welfare requirements in CoE Recommendations where UK legal provisions do not fully cover them;
- Most of the provisions of the CoE Recommendations on turkeys are covered by national legislation and the FAWC Code of Recommendations for Turkeys;
- However, certain provisions such as the ban on keeping turkeys in cages, at least twice daily inspections, specifications for light intensity, the provision of dimming periods for lighting, the requirements for a written veterinary health plan, certain record keeping provisions, an age limit for beak trimming and the requirement for veterinary performance of beak trimming or supervision of it when birds are older than 10 days are not covered in national legislation or the FAWC Code of Recommendations for Turkeys;
- Those provisions not covered by legislation are generally included as part of QA conditions. In many cases the provisions of the QA scheme give more detailed and higher minimum criteria than the statutory ones. However, in a few others their requirements do not always conform to the CoE Recommendations e.g. minimum lighting levels or the requirement for dimming of light and the age limits for beak trimming;
- Defra information suggests that approximately 94.5% of all year round turkey poults are reared under QA conditions. However, very few of the seasonal turkey producers comprising the remaining 5.5 % (approximately 5 to 600 producers with 1,000,000 birds per year) are members of a QA scheme and therefore there are large gaps in the application of CoE Recommendations to these holdings;
- No new legislation is planned to be drafted in the UK to meet CoE Recommendations. However, the CA intends to address these gaps with seasonal turkey producers in different ways such as via membership of farm or small producer organisations that could take on board certain of these requirements. The CA is aware of the legal gaps regarding CoE implementation in general and has, for instance, recently taken on board CoE Recommendations for meat chickens in the new draft of the Code of Welfare for meat

² *In their response to the draft report the Competent Authority noted that 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.*

chickens which is due for publication soon.

Conclusions

The UK CA has not fully implemented all the CoE Recommendations for major farmed species in legislation or through administrative measures such as the UK Welfare Codes of Recommendations but instead relies on commercial QA schemes to fill the legislative gaps.

With respect to turkeys the QA schemes often give greater guidance or prescriptive measures than those laid down in CoE Recommendations but they are not mandatory. The QA bodies do not carry out official controls and they are not audited by the CA. The CA's reliance on QA schemes to fill the legislative gaps does not provide an assurance that the whole sector complies with all legal obligations.

5.3 IMPLEMENTATION OF DIRECTIVE 2007/43/EC

5.3.1 Reporting of results of checks in poultry slaughterhouses

Legal Requirements

Annex III of Directive 2007/43/EC requires Official Veterinarians at poultry slaughterhouses to evaluate welfare indicators at *post-mortem* (PM) for flocks of densities higher than 33kg/m². In cases where the mortality rate or PM inspection results are consistent with poor animal welfare conditions, these have to be communicated to the keeper of the animals and to the CA for appropriate actions to be taken.

Findings

The UK authorities provided the following information on the operation of the trigger system:

- The system description below relates to GB but Northern Ireland is similar in application. GB has put in place a system (operational since July 2010) for the collection and communication of poultry slaughterhouse PM welfare indicators. High incidences of poor welfare indicators (triggers) are sent to AHVLA offices to investigate;
- The PM conditions monitored by the system were selected on the basis of published scientific evidence and discussions with representatives from the relevant CAs and industry. The conditions are: ascites/oedema; cellulitis and dermatitis; dead on arrival (DOA); emaciation; joint lesions; septicaemia/respiratory issues; total carcass rejections; CDMR and Foot Pad Dermatitis (FPD) score using a scorecard agreed by industry, FSA and Defra.
- The meat chicken welfare trigger system involves two processes:
 - Process 1 aims to identify holdings where the rate of one or more PM condition(s) is exceptionally high (greater than 6 standard deviations (SD) above the mean), possibly indicating a specific on-farm welfare issue:
 - Trigger levels in use for Process 1 are listed in Table 1 below. AHVLA are alerted if the level of a post-mortem condition is exceptionally high (exceeds mean + 6SD):

Post-mortem condition	Process 1 trigger level (%)
Ascites/Oedema	2.02
Cellulitis & Dermatitis	3.00
Dead on Arrival (DOA)	1.51
Emaciation	0.67
Joint lesions	0.43
Septicaemia/Respiratory	9.28
Total carcase rejections (farm attributable)	11.76
Cumulative Daily Mortality	11.85
FPD score*	167

* The FPD score is not a percentage but is a score of the severity and extent of lesions (between 0 and 200) based on scoring 100 feet. It can be found at:

<http://archive.defra.gov.uk/foodfarm/farmanimal/welfare/onfarm/documents/fpd-key-card.pdf>

- Process 2 aims to identify holdings where CDMR is unusually high (greater than 3 standard deviations above the mean) and, additionally, the rate of 3 or more PM conditions is above the national average, possibly indicating a more generalised on-farm welfare issue;

Trigger levels in use for Process 2 are listed in Table 2 below. AHVLA are alerted if the CDMR is unusually high (exceeds mean + 3SD = 7.37%) and, additionally, the rate of three or more post-mortem conditions is high (exceeds the mean).

Post-mortem condition	Process 2 trigger level (%)
Ascites/Oedema	0.21
Cellulitis & Dermatitis	0.20
Dead on Arrival (DOA)	0.12
Emaciation	0.04
Joint lesions	0.02
Septicaemia/Respiratory	0.49
Total carcase rejections (farm attributable)	1.11
FPD score*	60

- FSA officials within GB slaughterhouses carry out *ante-mortem* (AM) and PM inspections on all batches of meat chickens. Specifically trained plant staff (Poultry Inspection Assistants PIAs) can carry out PM inspections in certain abattoirs. Condition cards are used to increase the accuracy and consistency of recording PM findings. PM inspection results and details of CDMR, breed/hybrid and stocking density, provided on the (FCI) form submitted with the birds are entered onto the dedicated IT software. The system operates across all GB slaughterhouses and data are uploaded to a central FSA database every 24 hours. The trigger system operates within this central database and monitors the inspection results recorded by all batches of conventionally reared meat chickens. The system generates a trigger report for any batch of birds that exceeds the set threshold trigger levels;
- Once generated, each trigger report is checked by a Veterinary Manager to ensure that there are no obvious discrepancies. Any discrepancies identified are followed up with slaughterhouse staff and rectified. All trigger reports are emailed to FSA staff at the abattoir, and if provided, the abattoir FBO, the broiler producer named on the FCI form, and in some

cases, where permission has been provided, to the producer's private veterinarian. Trigger reports are also emailed to the Broiler Directive team within the AHVLA Specialist Service Centre (SSC) in Worcester for follow-up by AHVLA veterinarians;

- Upon receipt, all trigger reports are assessed by a veterinary officer (VO). The majority are resolved immediately following this assessment, with typical outcomes being that upon contacting the keeper the VO finds that action has already been taken to resolve the problem or that the problem relates to an off-farm issue (e.g. DOAs that are attributed to transport conditions rather than to a pre-existing problem on the farm and have already been followed up), and this is followed up separately. In other cases, action may already be in place following a previous trigger report and the VO may consider this to be sufficient to resolve the issue(s) identified in the current trigger report. Where no action plan is in place the VO may request the producer to develop and submit one for approval, and in a small number of cases a visit is carried out. All VO actions taken at the regional level are fed back to the broiler Directive team so that the outcomes of individual trigger reports are tracked.

The audit team visited one large commercial poultry slaughterhouse processing meat chickens and noted that:

- The trigger system functions as described and in a generally satisfactory manner to address the requirements of Annex III of Directive 2007/43, with some reservations detailed below:
- Not all batches of birds are routinely checked for FPD since February 2011. There are no specific instructions on what frequency or level of sampling to perform: this is left to the individual discretion of OVs which was stated to lead to inconsistent implementation between different slaughterhouses and OVs;
- There are two different types of reporting from slaughterhouses: normal reporting using information supplied by the FBO (including FCI) which is then collated and analysed by the FSA and may or may not lead to trigger reports, and exception reporting when the OV or PMI notes specific incidences of serious welfare conditions at AM or PM and then investigates;
- In exception reporting, the OV would be informed of potential cases of FPD or other conditions by the PMIs. If the level of FPD is judged 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. 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. This would then be sent directly to the AHVLA office where the farm was located for immediate follow up action. 26 such exception reports (since 2010), where serious welfare issues such as severe FPD, or high incidences of breast-blisters had been noted in the slaughterhouse visited and incident reports were sent to the relevant AHVLA offices for follow up. The OVs had never received any feedback from AHVLA on the 26 exception reports that they had sent for follow-up;
- The audit team followed three such exception reports which had also generated separate trigger reports and found that VOs in AHVLAs had contacted the keepers and private veterinarians to discuss the findings of the OVs report in two cases and had completed documentation to record this. No visits were carried out to the premises concerned as the birds were no longer on site and the VOs were satisfied with the explanations given and the actions put in place by the private veterinarians and the keepers. Assessment of these exception reports and trigger reports in general is not based upon the seriousness of the initial lesions but upon an assessment of the reasons for the PM findings, any actions already

taken and actions proposed by the owner and/or veterinary practice to rectify it after the event;

- FSA instructions for the exception reporting of welfare conditions from slaughterhouses to the regional AHVLA office was via email or fax. The ensuing delays noted in the transmission of these reports to the relevant VO meant that they could not react in sufficient time to any particular problem issue at slaughterhouse as the birds had usually been slaughtered by the time the reports were received³;
- Figures for daily mortality rates were not available on the FCI documentation seen at the slaughterhouse: CDMR records were available. Defra indicated that it had not implemented this requirement of their own legislation as it was deemed to be too burdensome on industry;
- The trigger system has been actively reviewed since its inception and a number of suggested changes have been put forward to improve its operation and resource implications such as: raising the indicator thresholds to limit the number of trigger report issued; suggestions to report on house rather than batch basis, collating multiple premises trigger reports and analysing seasonal data for trends;

Enforcement

- For GB there were 4016 process 1 and 792 process 2 trigger reports in 2012. Some of these reports will be for multiple batches sent from the same house on the same day;
- Enforcement action resulting from trigger reports is left mainly to the discretion of local VOs. There have been many hundreds of action plans requested since the system started operating in March 2010;
- Some frustration with the perceived heavy administrative procedures for assessing action plans was relayed to the audit team. To counter this and progress some longstanding chronic cases, meetings with poultry breeding companies, poultry veterinarians and keepers had been arranged as an initiative of certain VOs and had been well received by all involved and improvements in welfare conditions on certain farms had been noted as a result;
- Enforcement escalation advice is provided by the AHVLA Broiler Directive policy team when each trigger report is sent for action to the relevant AHVLA office. A more prescriptive escalation system introduced in May 2012 grades trigger reports into 5 options:
 - The first 3 options relate to notification of fewer than 3 trigger reports in the last 3 months; cases in this category can have any number of trigger reports generated prior to the preceding 3-month dataset;
 - Options 4 and 5 are where there are more than 3 and 10 trigger reports respectively in the last 3 months which require that either a visit should be considered (option 4) or should be carried out (option 5);
- 11 farms in GB were identified as Option 5 premises i.e. having more than 10 trigger reports within a 3 month period in 2012. This resulted in 10 advisory visits from an AHVLA VO though no full inspections using the WF 82 checklist were completed⁴;
- From a sample of holdings in one area visited, certain holdings had been the subject of over 90 trigger reports since March 2010 but no advisory visits had been carried out on them. In

³ *In their response to the draft report the Competent Authority stated that they had put in place a revised procedure for the reporting process for suspected breaches of animal welfare on the farm or during transport. The Competent Authority included a revised flowchart illustrating this procedure with their comments on the draft report.*

⁴ *In their response to the draft report the Competent Authority stated that these data are provisional and are subject to change following final collation of the 2012 data set.*

the same area, there had been 5 advisory visits to premises arising from trigger notifications in 2012 from 706 notifications, and 4 visits in 2013 from 203 notifications. During advisory visits VOs in the two areas did not always fill in a checklist or measure or assess owner's records of environmental parameters effectively to ensure they comply with the requirements in the Directive;

- There have been three welfare escalation investigations conducted into broiler farms since the trigger system came into operation in GB. One resulted from a heat stress situation that is currently being assessed by the local authority; the second related to a potential overstocking above the 39kg/m² limit which turned out to be a technical error in document processing. The third case which resulted in a successful prosecution under the Animal Welfare Act and the Welfare of Animals During Transport Order was based on PM findings of severe pododermatitis detected at slaughter and confirmed on farm;

Conclusions

The UK has put in place a well conceived and generally well implemented system for assessing and reporting on welfare indicators found at *post-mortem* in poultry slaughterhouses. Improvements in the welfare of chickens reared for meat are being targeted through the development of actions plans at farm level and graduated enforcement action. The system has been continually under review and development in order to refine its enforcement characteristics and simplify administrative procedures for those operating it.

It is not clear yet whether the system has been effective at raising the level of welfare on meat chicken farms but it has certainly generated enough information for the CA to be in a position to move more quickly in this direction. However, actions taken in response to exception reporting of severe welfare conditions found at slaughter noted by the audit team did not merit any visits or escalated enforcement action or feedback of information to the reporting OVs in the slaughterhouse visited and were therefore not fully effective.

5.3.2 Checks on 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. Such inspections shall be carried out on an adequate proportion of animals kept within each Member State, in accordance with the relevant provisions of Regulation (EC) No 882/2004, and may be carried out at the same time as checks for other purposes.

Article 4 of Directive 2007/43/EC requires training to be available for keepers of chickens bred for the production of meat.

Findings

- The UK implemented Directive 2007/43/EC through national legislation, which, for England can be found at following website (similar links exist for the devolved administrations in Scotland, Wales and Northern Ireland: http://www.legislation.gov.UK/U.K.si/2010/3033/pdfs/U.K.si_20103033_en.pdf

The national legislation for GB sets a stocking density limit of 39kg/m². The limit is set at 42kg/m² in Northern Ireland, though no premises are currently stocking at this rate;

- A series of workshops were delivered by the Agricultural Development Advisory Service

(ADAS) across the UK in the lead up to the implementation of Directive 2007/43/EC to inform meat chicken keepers of the new requirements. The UK also provided guidance to keepers on how to comply with the Directive including a dedicated webpage;

- Approximately 90-95% of industry keepers and staff made use of the UK's provision to use the principle of grandfather rights as laid down in Article 4(4) of Directive 2007/43. For those newer staff or keepers and owners not able to avail of this provision, there are extensive training opportunities available throughout the country and the provision of the courses and qualifications are overseen by the UK National Training and Proficiency Council. Satisfactory documentation of training for keepers and staff was provided during farm visits and staff met were competent in their tasks;
- VOs were trained in the lead up to implementation of the Directive requirements with seven training events held in 2009 and 2010. Senior veterinary Defra policy staff, ADAS specialists and AHVLA animal welfare veterinary leads provided training to approximately 100 VOs, about half of all VOs. Since then there has been local cascade and mentoring training. Both VOs met had received the training and were knowledgeable and competent in carrying out the inspections (notwithstanding the findings noted above);
- This training material has been made available to all AHVLA staff via the *Network of Expertise*: an internal AHVLA repository of information which also hosts interactive groups on various sectoral issues where problems can be discussed. There was a productive active discussion group on the meat chicken Directive and issues relating to its implementation, much of it relating to the trigger system;
- The preparation of the planned inspection programme for farm animal welfare (including for chickens reared for meat) was similar to that seen during the last FVO animal welfare audit in 2009 and as required in Article 3(1) of Regulation 882/2004 is based upon a system of risk prioritisation. As a result of research commissioned by Defra, membership of a QA scheme is now included as a criterion in the risk prioritisation which will reduce the likelihood of a premises being inspected;
- The frequency of all animal welfare checks is set to check 1% of single farm payment claimants with livestock. These farms are selected at central level for stand-alone welfare cross compliance inspections and are given various risk scores. 80% of these comprised the claimants with the highest risk scores and 20% were randomly selected⁵;
- The centrally selected farms are then notified to the regional AHVLAs to carry out inspections over the course of the year. In the two regions visited the number of premises inspected as a result of programmed inspections was in the order of 1%: i.e. 5/476 farms inspected in 2012;
- In addition, a number of targetted controls based upon the results of a well developed trigger system are carried out nationally. High incidences of poor welfare indicators collected by the Food Standards Agency (FSA) at slaughterhouses (trigger reports) are sent to AHVLA offices to investigate. More information on the trigger system is given above in Section 5.3.1.;

5 *In their response to the draft report the Competent Authority stated that 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.*

The audit team visited two large commercial broiler premises, one in each region and chosen by the CA, where VOs carried out inspections using the inspection checklist (WF 82). Both farms had previously been the subject of trigger reports on some batches of birds sent for slaughter. The audit team noted that:

- The inspection checklist covers all the requirements of Directive 2007/43/EC. However, questions on environmental parameters on gasses and relative humidity requiring the input of readings have no reference to the requirements of national legislation and whether any measured results comply;
- The requirements of Annex 1 point 7 of the Directive in relation to minimum lighting periods for birds were not met after the flocks had been thinned out in either of the premises visited but this had not been noted by the inspecting VOs until pointed out by the audit team. When asked about this, the keeper of the first farm erroneously cited QA requirements on light intensity and measurements of other environmental parameters. AHVLA acknowledged that this could be an industry wide issue which they will investigate;
- The feathering, alertness and movement of the birds and the environment of the first farm visited were reasonable. However there was evidence of widespread mild to moderate foot pad dermatitis (FPD);
- The levels of relative humidity on this farm regularly exceeded those laid down in national legislation (which mirrors the requirements of Annex II Point 3 of the Directive). This was not considered to be of any significance until the audit team pointed it out to the VO. The VO indicated that a letter would be written to the owner about the lighting issue but stated that the environmental issues could not be practicably rectified. The owner indicated that he was not willing to address the non-compliance on relative humidity for economic reasons. The levels of relative humidity were measured on a daily basis on the second farm and were recorded as satisfactory;
- On the second farm visited the VO observed that the birds were very uneven in size and the litter quality was poor in the house visited;
- The VO addressed the issue of inadequate lighting levels detected in the second premises and stated that a letter would be written to the keeper. Documentary evidence of the calibration of environmental measuring equipment was requested on site. Equipment was present on farm to measure NH₃ and CO₂ levels which were monitored twice a month to comply with QA standards;
- Defra guidance to VOs on suitable frequencies for monitoring environmental parameters by keepers suggests taking measurements of CO₂ and NH₃ levels when these agents pose maximum risk (usually during brooding and at maximum stocking densities respectively). Measuring frequencies for environmental parameters seen on the two farms visited did not provide adequate assurance (once a month, sometimes twice) that the requirements relating to these environmental parameters in Annex II point 3 of the Directive were effectively met. Instructions for action plans arising from trigger reports and examples seen made no reference to these requirements of the Directive set down in national law even though discussions on ventilation were seen as a critical point in the majority of action plans;
- Bearing in mind that 5 scheduled visits to broiler premises were made in 2012 (with 2 full checklists completed) and an additional 12 advisory visits (with no checklists completed) and that there are 468 premises in the areas visited and the regular production cycles throughout the year in the broiler industry of approximately 6 to 7 flocks per year, the CA has very little concrete information about the situation on the farms or in the sheds themselves. Article 7 of the Directive does require that inspections shall be carried out on an

adequate proportion of animals kept within each Member State;

- Daily mortality rates (DMR) had been calculated on the premises visited but not sent in the food chain information (FCI) records accompanying birds to slaughter. The requirement to send information on DMR is clearly indicated in national legislation (and in point 1(1) of Annex III to the Directive) but is not a requirement for submission in FCI records, though FBOs are required to indicate mortality rates at 14 days;

Conclusions

The CA has a well developed and generally satisfactory system of official controls to implement the meat chicken Directive which targets the majority of premises by risk analysis both at the initial selection of farms for cross compliance inspections and then as a result of information (triggers) received from slaughterhouse checks. However, the absolute numbers of inspection visits arising from each of these risk targeting processes is relatively low in relation to the scale of production and the number of animals involved.

Environmental parameters are not being adequately controlled due to the relatively low number of visits (and insufficient evidence obtained therefrom) and also because action plans (produced in response to PM trigger reports) make no reference to these requirements of the Directive set down in national law. Bearing in mind the regular ongoing discussions of ventilation as a critical point in the majority of action plans seen by the audit team, the opportunity to remind, include and enforce these legislative requirements is not being effectively and fully exploited.

Sufficient training for keepers of meat chickens, of a recognised standard, and provided within a national proficiency framework, is available to address the requirements of Article 4 of Directive 2007/43/EC.

5.4 CHECKS ON TURKEY FARMS

Legal requirements

Council Decision 78/923/EEC concerning the conclusion of the European Convention for the protection of animals kept for farming purposes and Council Decision 92/583/EEC on the conclusion of the Protocol of amendment to the European Convention for the Protection of Animals kept for Farming Purposes have approved the Convention on behalf of the EU. The Recommendations adopted under the Convention must be applied in national legislation and/or other administrative arrangements.

Findings

The system for planning and selection of premises for carrying out animal welfare visits to turkey farms is the same as that which has already been described in section 5.3.2 for broilers. The audit team noted that:

- In the two regions visited, the number of premises inspected in 2012 as a result of programmed inspections was very low. In the two regions, which together account for a large percentage of turkey production in the UK and have 541 premises (343 + 198), there were 4 and 0 visits respectively carried out in 2012: three cross compliance programmed inspections and one complaint. AHVLA also visited, in 2012, 19 turkey farms in the first region and 2 in the second to verify compliance with animal welfare at slaughter requirements;
- The UK Veterinary Public Health Association, in conjunction with a number of partners and the turkey industry, has produced a DVD for turkey producers and veterinarians on the

health and welfare of turkeys from farm to fork.

The audit team visited one all year round commercial turkey farm with 18 houses and approximately 200,000 birds.

- The audit team observed a competent and in-depth inspection carried out by a trained VO;
- Based on a sample of the two houses inspected, the general condition of the birds and the environment on the premises was satisfactory;
- The checklist (AWF1) used for inspections on turkey farms is general and while it does cover the requirements of Directive 98/58/EC it does not cover all the requirements of the CoE Recommendations on turkeys. However, the VO effectively extrapolated certain of the requirements of the meat chicken Directive and applied them to the inspection of the premises;
- VOs can access a database to view whether farms are listed as a member of a QA scheme. There is no CA requirement to assess any QA reports of the farm. However the VO did discuss the results of QA audits while not examining the reports in detail;
- Verification of animal welfare standards on turkey farms is a relatively low priority for Defra/AHVLA due to evidence from previous reports of a low level of perceived welfare risk.

Conclusions

The CA is carrying out a satisfactory standard of official controls on turkey farms, using general welfare procedures followed by trained staff which address the requirements of Council Directive 98/58/EC. However, the scope of checklists and official procedures does not fully cover the CoE Recommendations for turkeys and these are therefore not being effectively verified on farms.

5.5 VERIFICATION OF FARM INSPECTIONS

Legal requirements

Article 8 (3) states that CAs must have procedures in place to verify the effectiveness of official controls, to ensure effectiveness of corrective action and to update the documented procedures for carrying out official controls where needed.

Findings

- AHVLA has carried out a quality review of its work processes in 2012 and concluded that in a number of areas, including:
 - Reviewing instructions and procedures;
 - The assessment and review of field skills and
 - Assessment of competence, both initial and ongoing;

the systems in place do not fully meet the requirements of Article 4 of Regulation 882/2004. AHVLA intends to introduce a system for quality assurance with which it aims to address these findings through the development of audit processes;

- With respect to the implementation of Directive 2007/43 specifically, there is a system in place to verify the effectiveness of some aspects of official controls and additional ad-hoc actions have also been taken; these are described below:

- An ongoing documentary review by the AHVLA technical veterinary services manager of 10% of action plans generated as a result of trigger reports. In addition, those cases chosen for escalated enforcement action are all reviewed by the same person;
 - A review of the first year of operation of the trigger system has been produced which identified and made proposals for system revision;
 - A teleconference between policy officers and implementing lead regional veterinary officers on the implementation of the Directive, specifically focussing on intervention levels, enforcement and perceived low frequencies of farm inspection visits;
 - The Network of expertise discussion groups which is a useful forum to put forward suggestions for improvement and revision of procedures and receive responses on policy questions;
 - A research study being carried out by the University of Bristol to assess the impact of all aspects of the Directive including training of keepers, the slaughterhouse monitoring and feedback of welfare indicators and AHVLA enforcement activity.
- There are no procedures for verification of the effectiveness of how official controls are carried out on farm.

Conclusions

The CA has put in place satisfactory actions to date to effectively monitor the implementation of most of the requirements of Directive 2007/43/EC even if these are not always systematic and there are some gaps in their scope.

The CA has identified these non-compliances and proposes to address them by introducing audit capabilities, but it has not put forward any actions for systematic ongoing verification of the effectiveness of official controls at all levels.

6 OVERALL CONCLUSIONS

The UK has not fully implemented all the CoE Recommendations for major farmed species in legislation or through administrative measures such as the UK Welfare Codes of Recommendations but instead relies on QA schemes to fill the legislative gaps.

With respect to turkeys, which was the sector that was dealt with in some depth during this audit, the QA schemes often give greater guidance or prescriptive measures than those laid down in CoE Recommendations but these are not mandatory. The QA bodies do not carry out official controls and they are not audited by the CA. The CA's reliance on QA schemes to fill the legislative gaps does not provide an assurance that the whole sector complies with all legal obligations.

The UK has put in place a well conceived and generally well implemented system for assessing and reporting on welfare indicators found at *post-mortem* in poultry slaughterhouses. Improvements in the welfare of chickens reared for meat are being targeted through the development of actions plans at farm level and graduated enforcement action.

It is not clear yet whether the system has been effective at raising the level of welfare on meat chicken farms but it has certainly generated enough information for the CA to be in a position to move more quickly in this direction. However, actions taken in response to exception reporting of indications of severe welfare conditions found at slaughter noted by the audit team did not merit any visits or escalated enforcement action or feedback of information to the reporting OVs in the slaughterhouse visited and were therefore not fully effective.

The CA has a well developed and generally satisfactory system of official controls to implement the meat chicken Directive on farm which targets the majority of premises by risk analysis, both at the initial selection of farms for cross compliance inspections, and then as a result of information (triggers) received from slaughterhouse checks.

However, the absolute number of inspections visits arising from each of these risk targeting processes is relatively low in relation to the scale of production and the number of animals involved. Environmental parameters are not being adequately controlled due to the relatively low number of visits (and insufficient evidence obtained therefrom) and also because action plans (produced in response to post- mortem trigger reports) make no reference to these requirements of the Directive set down in national law.

Sufficient training for keepers of meat chickens, of a recognised standard, and provided within a national proficiency framework, is available to address the requirements of Article 4 of Directive 2007/43/EC.

7 CLOSING MEETING

A closing meeting was held on 1st March 2013 with representatives of the CCA. At this meeting, the main findings and preliminary conclusions of the mission were presented by the FVO team. The representatives of the CA did not express any major disagreement with these but provided a number of clarifications to the audit team team which were duly noted.

8 RECOMMENDATIONS

The competent authorities are invited to provide details of the actions taken and planned, including deadlines for their completion ('action plan'), aimed at addressing the recommendations set out below, within twenty five working days of receipt of this specific audit report.

N°.	Recommendation
1.	The CA should continue with measures to achieve full implementation of the Recommendations concerning farming of additional relevant species as laid down in the European Convention for the Protection of Animals kept for Farming Purposes, including the provision of suitable checklists and official procedures to fully cover the Council of Europe Recommendations.
2.	The CA should take measures to ensure that: the environmental parameters specified in Annex 1 point 7 of the Directive in relation to minimum lighting periods for birds, gas parameters laid down in Annex II point 3 of Council Directive 2007/43/EC, and the requirements for records of daily mortality rates to accompany consignments of birds to slaughterhouses as required in point 1(1) of Annex III to the Directive, are effectively monitored and enforced in the application of national measures to ensure the welfare of chickens reared for meat in the UK.
3.	The CA should take measures to ensure that, as required in Article 8(3) of Council

N°.	Recommendation
	Regulation (EC) No 882/2004, sufficient procedures and processes are put in place to guarantee the effectiveness and appropriateness of official controls on all areas of the production of chickens reared for meat.
4.	The CA should take measures to ensure that, as required in Article 4(3) of Regulation (EC) No 882/2004, there is effective communication between OVs and AHVLA VOs in the transmission and feedback of information relating to exception reporting of indications of severe welfare conditions found in birds at slaughterhouses.

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=2013-6822

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
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. 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. 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
Dec. 2006/778/EC	OJ L 314, 15.11.2006, p. 39-47	2006/778/EC: Commission Decision of 14 November 2006 concerning minimum requirements for the collection of information during the inspections of production sites on which certain animals are kept for farming purposes
Dec. 92/583/EEC	OJ L 395, 31.12.1992, p. 21-21	92/583/EEC: Council Decision of 14 December 1992 on the conclusion of the Protocol of amendment to the European Convention for the Protection of Animals kept for Farming Purposes
Dec. 78/923/EEC	OJ L 323, 17.11.1978, p. 12-13	78/923/EEC: Council Decision of 19 June 1978 concerning the conclusion of the European Convention for the protection of animals kept for farming purposes