



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and food audits and analysis

DG(SANTE) 2019-6593

FINAL REPORT OF AN AUDIT  
CARRIED OUT IN  
SWEDEN  
FROM 13 MAY 2019 TO 17 MAY 2019  
IN ORDER TO  
EVALUATE THE USE OF QUALITY CONTROLS AND INDICATORS FOR ANIMAL  
WELFARE

*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 took place in Sweden from 13 to 17 May 2019 to determine whether the authorities responsible for animal welfare on farms have a strategic approach to enforcement of European Union requirements, whether controls follow "quality management" principles and whether animal welfare indicators are used to measure the severity, extent and permanence of animal welfare problems.*

*The Ministry of Enterprise and Innovation strategy is based on prevention of animal welfare problems through compliance with the legislation, which in many regards is stricter than EU requirements. The Board of Agriculture has in turn set objectives to ensure good- risk based and fair controls and uses its Multi-Annual National Control Plan operational objectives to monitor the performance of the twenty one county administrative boards. By focussing on the delivery of the operational objectives, the Board of Agriculture has gone a long way to achieve fair and consistent controls throughout the country. However, the focus has been to ensure that county administrative boards operate in a correct manner, rather than checking if they are doing the correct thing, and the Board does not measure if the system as a whole meets higher level objectives. As a result all counties now use the Board's risk classification model, but the Board of Agriculture has not reviewed or evaluated the effectiveness or efficiency of this model, and hasn't assessed if the objective for "a good risk- based" control has been met.*

*Calibration exercises and a joint animal welfare control council help to achieve consistent controls and procedures for inspection are quite comprehensive. However there were two gaps in controls: a failure to communicate relevant findings from post-mortem inspections to the authority responsible for follow-up investigations, and inadequate data of mortalities in broiler flocks was sent with each flock to slaughter, as well as inadequate checking of this data.*

*The Board of Agriculture sends two reports on the results of inspections to the Commission annually, one on the basis of a specific reporting decision and one to satisfy a requirement of the official control Regulation. They also report to the Swedish Ministry of Enterprise and Innovation. These reports present a picture of each sector in terms of percentages of farms which were compliant/non-compliant on each legal requirement, and this data is compared with previous years. The authorities use animal-based indicators in their official controls to score the extent and severity of some of the more common problems encountered, such as dirty cattle and pigs. These scores stay at farm level and the degree of non-compliance is not reflected in reports at national level.*

*The system for cross-compliance with EU requirements includes an assessment of deficiencies according to their severity, extent, permanence and recurrence. This assessment gives a better picture of the significance of deficiencies than simply stating compliant/non-compliant. Again this information is not captured in national level reports, although it could be useful for analysing the seriousness of the animal welfare problems which are reported.*

*Regarding animal welfare measures under rural development programmes, a good practice was the use of data collected for other purposes, e.g. a quality assurance scheme, so that farmers could demonstrate the outcome of the measure. More generally, a lot of data based on animal-based indicators is collected for quality assurance schemes and official controls will need to take such schemes into account from 14 December 2019. Perhaps synergies similar to the case of the rural development programme and the use of quality assurance data can also be found for official controls.*

*The report contains recommendations to address the shortcomings identified regarding the risk classification model, the lack of access to post-mortem findings and the inadequate data accompanying broiler flocks to slaughter.*

## Table of Contents

1	Introduction .....	1
2	Objectives and scope .....	1
3	Legal Basis .....	2
4	Background .....	2
5	Findings and Conclusions .....	2
5.1	Management of official controls .....	2
5.2	Reporting of controls .....	6
5.3	Animal welfare indicators .....	8
6	Overall Conclusions .....	11
7	Closing Meeting .....	12
8	Recommendations .....	12

## ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

<b>Abbreviation</b>	<b>Explanation</b>
EU	European Union
MANCP	Multi-Annual National Control Plan
The Board of Agriculture	Swedish Board of Agriculture
The Ministry	The Ministry of Enterprise and Innovation

## 1 INTRODUCTION

This audit took place in Sweden from 13 to 17 May 2019 as part of the planned audit programme of DG Health and Food Safety. An opening meeting was held with the competent authorities on 13 May 2019. 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 auditors from the European Commission's Directorate General for Health and Food Safety and a national expert from The Netherlands.

## 2 OBJECTIVES AND SCOPE

The objective of the audit was to determine whether the authorities responsible for animal welfare on farms have a strategic approach to enforcement of EU requirements, whether controls follow "quality management" principles. The audit also considered the use of animal welfare indicators to measure the severity, extent and permanence of animal welfare problems.

Specifically the audit aimed to determine:

- Whether policy objectives, indicators and analysis are used to inform future actions to improve animal welfare.
- The reliability and relevance of reporting of official controls of animal welfare on farms<sup>(1)</sup> and whether this reporting allows authorities at different levels to have a clear picture of the animal welfare situation on farm.
- The use and suitability of animal welfare indicators to measure the severity, extent and permanence of animal welfare problems, and how well these are accepted by both the agri-food sector and the competent authorities.

The main audit criteria are from EU legislation, which is listed in the Annex and specific references are also provided at the start of each of the findings section in this report. Reference is also made to "network reference documents", which do not constitute an audit standard and are not legally binding. They provide guidance on the implementation of Regulation (EC) No 882/2004 of the European Parliament and of the Council and were developed by the Multi-Annual National Control Plan (MANCP) network of officials from national competent authorities who meet regularly, under the chairmanship of, and facilitated by, DG Health and Food Safety to exchange experiences in preparing, implementing and reporting on MANCPs.

---

<sup>1</sup> Reports required by Commission Decision 2006/778/EC concerning minimum requirements for the collection of information during the inspections of production sites on which certain animals are kept for farming purposes (OJ L 314, 15.11.2006, pp. 39–47) and reporting of inspections required by Council Directive 2007/43/EC on protection of chickens kept for meat production (i.e. "broilers").

### **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.

### **4 BACKGROUND**

The EU's Strategy for the Protection and Welfare of Animals 2012-2015<sup>(2)</sup> indicated that the Commission would consider the feasibility and the appropriateness of introducing science-based indicators based on animal welfare outcomes as opposed to welfare inputs which was largely the approach to date. EU legislation applicable to the welfare of broilers and welfare of animals at slaughter does include certain indicators and as part of the strategy it was necessary to build on the experience gained in those areas.

In 2018, the European Court of Auditors concluded in their special report<sup>(3)</sup> that EU actions on animal welfare have improved compliance with animal welfare requirements and have supported higher standards with a clear positive impact on animal welfare. However, certain weaknesses persist and there is scope for improving coordination with cross-compliance checks and the use of rural development support for animal welfare.

This audit therefore also included an assessment of the links between cross-compliance checks and official controls and the use of rural development support for animal welfare, in particular the use of animal welfare indicators for assessing the impact of such measures.

### **5 FINDINGS AND CONCLUSIONS**

#### **5.1 MANAGEMENT OF OFFICIAL CONTROLS**

EU legislation does not make explicit reference to quality management systems but Regulation (EC) No 882/2004 requires Competent Authorities to plan their controls, to carry out the controls according to documented procedures, to verify the effectiveness of those controls and to review the controls, as appropriate. These are essentially the same elements as prescribed in modern Quality Management Systems, i.e. the Plan-Do-Check-Act cycle. When a Competent Authority implements these elements, it can be considered as following quality management principles.

---

<sup>2</sup> [https://ec.europa.eu/food/sites/food/files/animals/docs/aw\\_eu\\_strategy\\_19012012\\_en.pdf](https://ec.europa.eu/food/sites/food/files/animals/docs/aw_eu_strategy_19012012_en.pdf)

<sup>3</sup> See report: "Animal welfare in the EU: closing the gap between ambitious goals and practical implementation" available at:  
[https://www.eca.europa.eu/Lists/ECADocuments/SR18\\_31/SR\\_ANIMAL\\_WELFARE\\_EN.pdf](https://www.eca.europa.eu/Lists/ECADocuments/SR18_31/SR_ANIMAL_WELFARE_EN.pdf)

## Legal requirements

Articles 3(1), 42(2)(a)<sup>(4)</sup> and (b) and 42(3) of Regulation (EC) No 882/2004.

## Findings

1. The Swedish model for animal welfare is based on stricter rules, prevention of problems, healthy animals and low use of antibiotics. The Swedish animal welfare act aims to ensure and promote good animal welfare and respect for animals. This is the context in which, each year, the Ministry of Enterprise and Innovation (hereafter the Ministry) sets the purpose of the work via a "letter of direction" to the Board of Agriculture and the county administrative boards.
2. The Ministry also has a strategy to promote Swedish food production. As part of this long term objective in which the strategy runs until 2030, the Ministry has given the Board of Agriculture an assignment aimed at animal welfare control. This task is to ensure that animal keepers have complied with the animal welfare rules and treated the animals well, which in turn will result in animals that are healthy and do not need to be treated against diseases.
3. The Board of Agriculture in turn has set the purpose of animal welfare inspection carried out by the county administrative boards: to ensure animal welfare and that breeders live up to their responsibility to comply with animal welfare legislation. The Board of Agriculture's role is to coordinate and harmonise animal welfare controls which are carried out by the county administrative boards and the official veterinarians working for the National Food Agency, so that inspections carried out by the 21 county administrative boards and the official veterinarians working for NFA are as comparable, effective and legally sound as possible.
4. In its MANCP, the Board of Agriculture aims to have good risk based and fair controls, which make it easier for companies to do the right thing. The MANCP also has operational objectives which include:
  - a. At least as many planned controls ("normal controls") to be carried out as controls carried out in response to information received of alleged animal welfare problems ("notification controls"). The aim is to avoid wasting inspection resources, and each county administrative board is expected to process allegations or external notifications so that no more than 20 % of the inspections subsequently carried out prove the allegation unfounded. The county administrative boards vary a lot in meeting this target, i.e. that no more than 20 % of the inspections subsequently detect no deficiencies, but in 2017 the target was met in the country as a whole.

---

<sup>4</sup> The MANCP network reference document "Developing Objectives and Indicators" states that the underlying principle behind these requirements and guidelines is that we cannot manage our control systems without setting clear objectives and monitoring progress towards those objectives. A strategic objective is a long-term objective, setting out what an official control system and its priorities intend to achieve. Strategic objectives usually relate to outcomes and impacts. Objectives should be Specific, Measurable, Attainable, Relevant, and Time-bound (SMART).

- b. Control reports to be sent out to the livestock owner within 21 days after the control.
  - c. To determine what basic skills are needed for animal welfare controls.
  - d. The risk classification model (SToRK) is used for prioritising controls. The goal is that each county administrative board assesses animal welfare risks using the same criteria. SToRK calculates a total risk-score from: type of production, species, size of holding, history of non-compliance (three modules), control frequency and kind of production. For example commercial broiler farms are always categorised as high risk based on the score for "type of production".
  - e. Calibration education programmes for different types of animals take place every other year.
5. The Board of Agriculture monitors whether the county administrative boards achieve these operational objectives. As a result of this monitoring, the Board of Agriculture stated that all counties now use the risk classification model. The county visited by the audit team used the risk classification model but pointed out several problems with the data provided and therefore they used their own local knowledge to some degree when selecting farms for controls. The Board of Agriculture have not evaluated how the risk classification model performs in practice and how effective it is in identifying risk.
  6. The Swedish Board of Agriculture has developed a quality assurance system in 2010 called Animal Welfare declaration (Djurskyddsdeklaration). Herd veterinarians in Sweden working in pig farms who can allow pig farmers the right to administer certain medicines, conditional on a visit every five weeks from their private veterinarian where this quality assurance system is used at farm level. These veterinarians have received training and make a declaration after every visit on compliance with certain animal welfare criteria. The Farm and animal health organisation (Gård & Djurhälsan) employs many such veterinarians. The farmer has to provide an action plan to address any deficiencies, and if the deficiencies persist then the veterinarian must notify the county administrative board. No cases were notified to the county visited. The county administrative board agreed that this was a potentially valuable source of information for risk based planning of official controls. However this lack of notifications presented a very different picture of the level of compliance compared to the result of official controls.
  7. Several initiatives support the higher objective to achieve comparable, effective and legally sound inspections. From 2012, the Board of Agriculture and the 21 county administrative boards have worked together in the Joint Council for Animal Welfare Control. There have also been calibration exercises every second year, each focusing on a different species.
  8. Procedures for controls were comprehensive, with two gaps identified by the audit team.
    - a. The National Food Agency procedures for official controls at broiler

slaughterhouses included a check of the number of broilers dead on arrival, and a threshold for action, i.e. inform the county administrative board when this is 1% or more. Official controls also took into account footpad dermatitis scores. However, the National Food Agency had not instructed official veterinarians to check that the daily mortality rates were sent with each flock and to check the plausibility of these mortality rates and the issue is not covered by the guidelines from the Swedish Board of Agriculture. Article 3(1) and Annex III 1 to Directive 2007/43/EC require this data to be sent and the official veterinarian to supervise the assessment of this data for flocks with stocking densities above 33kg/m<sup>2</sup>.

- b. Data for official controls did not include access to all *post-mortem* findings for domestic ungulates at large-scale slaughterhouses, consisting of 80% of slaughtered number of animals per year. There is total access to post-mortem findings for domestic ungulates and farmed game in small-scale slaughterhouses, consisting of 20% of slaughtered number of animals per year. There is total access to data of fresh meat (> 10 kg) declared unfit for human consumption as well as notifications sent to county officials concerning possible animal welfare problems arising in primary production from all slaughterhouses. Official veterinarians in all large-scale slaughterhouses for domestic ungulates did not have access to *post mortem* findings when sending a notification to a county administrative board to investigate a possible welfare problem in primary production. Official veterinarians indicated that post-mortem findings that do not result in a written declaration as unfit for human consumption (< 10 kg) was considered as the property of the Food Business Operator and they could not send this data with notifications to a county administrative board. Article 5, Section I Chapter II B 1 and C, and Section II Chapter I of Annex I to Regulation (EC) 854/2004 of the European Parliament and of the Council require the official veterinarian to verify compliance with EU and national rules on animal welfare and to take measures to communicate these results. The audit team reviewed a case where the official veterinarian found evidence of tail bitten pigs at a slaughterhouse. In this case only ante mortem findings were sent to the county administrative board responsible for the farm of origin. No *post-mortem* data was sent even though this potentially provides a more valuable insight into the severity, duration and extent of the problem.

## **Conclusions**

9. The Ministry's higher level objectives are based on the Swedish model for animal welfare, which is well renowned and understood by stakeholders and authorities. The Board of Agriculture's use of clear language in their MANCP objectives "*a good risk based and fair control, which make it easier for companies to do the right thing*" makes it clear what they aim to achieve and is relevant both for officials carrying out controls as well as operators who receive controls.

10. Both the Ministry and the Board of Agriculture work on the premise that the higher level objectives will be met if they ensure compliance with the legislation. The Multi-Annual National Control Plan also contains operational objectives which are specific and measurable and which the Board of Agriculture use to measure the performance of the county administrative boards. This has been successful in ensuring that the 21 county administrative boards work in a more consistent way; however, the evaluation has been more on doing things in the correct manner, rather than evaluating if the control system leads to doing the correct things. So although all counties now use the risk classification model, the objective for "a good risk based" control has not been measured as the Board of Agriculture has not reviewed or evaluated the effectiveness or efficiency of the implementation of the risk classification model.
11. The consistency of controls has been improved by calibration education programmes and the joint animal welfare control council<sup>5</sup> and as a result procedures for inspections are quite comprehensive. The two gaps in controls, the data accompanying broiler flocks to slaughter, and the use of *post-mortem* findings, both concern the interaction between the Board of Agriculture, the county administrative boards and the National Food Agency in relation to farm welfare controls. The communication of *post-mortem* findings may in particular have a significant impact on avoiding animal suffering, as such data may influence whether or not a follow up investigation is carried out.

## 5.2 REPORTING OF CONTROLS

Under the current EU requirements, the Member States submit three different types of reports addressing animal welfare: a report on the implementation of the MANCP; a report on inspections carried to verify compliance with Directive 2007/43/EC (the "Broiler Directive") and a report of inspections of production sites on which certain animals are kept for farming purposes, as required by Decision 2006/778/EC. There may also be internal or national requirements for other reports which the CA has to satisfy. These reports have slightly different purposes and therefore, their contents are different. However, there is one common objective for these reports: to describe whether the Member States' animal welfare objectives were achieved during the reporting period.

### Legal requirements

Article 44(1) of Regulation (EC) No 882/2004, Decision 2006/778/EC and Article 7(2) of Directive 2007/43/EC

---

<sup>5</sup> In their response to the draft report, the authorities indicated that in addition to calibration education programmes and the work of the joint animal welfare control council, consistency of controls has been improved by publishing national guidelines for each area of control or species of animals, and by use of a digital platform called "Ciceronen" where FAQ control issues are explained.

## Findings

12. The Board of Agriculture provides the Commission with an annual report, which includes results of inspections and an analysis of the results. This provides the number of checks and the numbers of non-compliances as required by Decision 2006/778/EC. For example there were 321 checks of 6,678 pig farms and 2285 checks of 36,373 cattle farms in 2017, with a similar scale and type of shortcomings in 2016 and 2017. A report on implementation of the MANCP, as required by Article 44(1) of Regulation (EC) No 882/2004, is also provided to the Commission and contains similar information.
13. The Board of Agriculture also reports to the Ministry each year on the outcome of official controls, including statistics and an analysis which includes comparisons with previous years. These include additional information on checks of the stricter rules of national requirements. Some national requirements are more animal-based than EU requirements, e.g. EU legislation requires buildings in which animals are kept to be clean, and Swedish legislation has the additional requirement that the animals must be clean. In the national guidelines, the Board of Agriculture has links to criteria (developed by among others The Swedish University of Agricultural Sciences) for assessing requirements such as body condition and cleanliness, and inspectors use these for the on farm assessment.
14. There are approximately 14,000 inspections every year as a result of notifications. These are targeted checks based on information received from a third party which indicate potential animal welfare problems, and include notifications regarding pets and horses. Overall, the inspections carried out as a result have a detection rate of 60% non-compliance. The cases relevant to farm animals are not included in the report to the Commission as these are not planned inspections and don't meet the criteria defined in Decision 2006/778/EC.
15. Inspectors also record non-compliances with EU requirements for the purpose of cross-compliance checks. The cross compliance system requires non-compliances to be indicated in terms of the extent, duration, severity and recurrence of the deficiency detected. However non compliances with national requirements are again not included, such as the assessments of body condition and cleanliness. Nevertheless, data from each cross-compliance does give additional information on severity, extent, duration and recurrence of animal welfare non-compliances, but there is no overview of this at national level, as the cross compliance system requires data to be aggregated to the number of deficiencies against each Directive.

## Conclusions

16. The report to the Commission contains the planned checks of EU requirements, which meets EU requirements. The report to the Swedish Ministry contains additional data, regarding Swedish requirements and the outcome of notifications of potential animal welfare problems. Both reports provide an analysis, as required, with percentages of farms found compliant/non-compliant on each legal requirement and comparisons with previous years.
17. The cross-compliance assessment potentially gives a clearer picture of animal welfare problems as conclusions are reached on the severity, extent, permanence and recurrence. However, not many of the requirements from EU Directives are animal based and so this assessment is not necessarily directed at assessing the animals.
18. Official control results are simply reported in terms of compliance/non-compliance. The lists of compliance/non-compliance for each EU requirement are compiled and analysed for the national report. Cross-compliance, however, is aggregated to non-compliances against the relevant Directive. The assessment of the severity, extent, duration and recurrence of non-compliances is not included in the overall analysis, and this is a loss of a valuable source of information which could potentially be useful at a national level for determining the most serious animal welfare problems.

## 5.3 ANIMAL WELFARE INDICATORS

A Commission funded project: "Welfare Quality", has developed principles and indicators for assessing the welfare of farm animals<sup>(6)</sup>. The Welfare Quality Principles require housing, feeding, health and behaviour to be included in any on-farm assessment of animal welfare. The project concluded that animal-based indicators are better for measuring animal welfare but resource and management-based measures should also be included, in particular, when animal-based indicators are not sensitive enough or are unsatisfactory in terms of validity, reliability, or feasibility. EU legislation on welfare of broilers includes certain animal-based indicators such as mortality rates of broilers and *post-mortem* findings. Requirements for animal welfare at slaughter include the use of indicators to detect signs of unconsciousness and consciousness or sensibility in the animals; as well as indicators to detect the absence of signs of life.

### Legal requirements

Article 3(5) and point 1(c) of Annex V to Directive 2007/43/EC

Point 2 of Annex III to Directive 2007/43/EC (in the context of controls under Regulation (EC) No 854/2004).

## Findings

---

<sup>6</sup> <http://www1.clermont.inra.fr/wq/index.php?id=protocol&prod>

19. The Board of Agriculture and the Food Agency have developed, in consultation with the industry and county administrative boards, scoring of the common recurrent problems (body condition scores, cleanliness). Animal based criteria are used for assessing these legal requirements. For example dirtiness of cattle is categorised depending on the degree by which the dirt penetrates the skin. The instruction indicates four categories for cattle, with cases with widespread contamination, evidence of hairless areas and/or manure/urinary burn categorised as "heavily contaminated".
20. Regarding the possible use of other indicators for cattle, Sweden is part of a Nordic Council Project "*Use of animal-based welfare indicators in official inspections at farms*", which has focused on inspections of cattle for the last five years. The aim of the project is to have a screening tool for an initial assessment during an official control, using simple and quick indicators which give consistent results. The approach in the Nordic project is to categorise each farm: green, yellow or red, using scores for animal-based indicators for cleanliness, body condition, lesions and lameness. A low score will allow a farm to be categorised as "green" i.e. acceptable, even if there are a certain number of deficiencies. The Board of Agriculture indicated, in answering a pre-audit question, that this approach is not considered suitable for their system of official controls. A Board of Agriculture representative further clarified that they aim for a preventive approach at the level of the individual animal, and that producers must follow the legislation which in turn will ensure that producers do not have animal welfare problems.
21. When official veterinarians in slaughterhouses have findings which may indicate a problem on the farm of origin, and they have to notify the county administrative board responsible for the farm, their guidance document asks them to indicate the severity and duration of the problem and also what may have been the cause of this animal welfare deficit. The information that goes to the county administrative board from the official veterinarian should normally also be provided to the relevant animal keeper (primary producer, carrier or slaughterhouse).
22. Business operators and authorities use footpad dermatitis scores as an indicator of the welfare of broiler flocks. Both parties agreed that it is a useful indicator for identifying welfare problems on farm.
23. The Board's rural development programmes are largely based on the provision of resources to the animals which are additional to the national requirements. A small number of animal-based indicators are also included in certain animal welfare measures:
  - a. Farmers who get subsidies via an animal welfare measure for cow welfare can use data from a private programme to demonstrate the outcome on their farm. 65% of cows in Sweden are in a hoof health programme where a third party collects data on a range of animal based indicators. This programme has been used by quality assurance schemes over a number of years and the data can be used to establish a baseline and demonstrate the impact of rural development spending.

- b. Measures for sow and sheep welfare also include the use of indicators. One such measure requires each farmer to assess the body condition score of their animals, using a protocol from the farm and animal health organization (*Gård & Djurhälsan*). Farmers provide a self-evaluation on the impact of the measure. A majority of farmers reported that the measures had improved animal welfare, with 40% of sheep farmers indicating that the scheme had no effect on sheep body condition score and 13-14% of sow farmers reporting that the measure had no effect. A representative of the Board of Agriculture indicated that self-evaluations by a large number of participants provide valuable information on the outcome, as even though there are always a percentage of farmers who are too lenient on themselves there is usually a percentage who are too stringent which provides a balance.
24. Several quality assurance schemes, e.g. in the dairy and poultry sectors, use a range of animal welfare indicators to assess animal welfare on farm. A third party carries out the assessments of the farms on behalf of the processor/company which is marketing such products with a label based on private standards.
25. Third party assessors have been scoring farms using animal welfare indicators for over a decade and can demonstrate that continuous improvement has been made, albeit with certain indicators showing greater improvement than others. For example hoof injuries and "bleeding" (white line disease) in dairy cows has decreased whereas digital dermatitis has stayed more or less the same. Data from throughout the life of each cow is available as it is collected four times a year. For adult cows the criteria are cow mobility; cleanliness; lesions; and Body Condition Score. A representative of the third party who carries out these assessments indicated that:
- a. Somatic Cell Count does not correlate 100% with scores of the other criteria but high Somatic Cell Counts do indicate the poor performers.
  - b. Progress is achieved by continual feedback to the farmer so that they are clear what issues are sub-optimal.
  - c. Several visual models are used to indicate the strengths and weaknesses of the farmer's performance. One uses a star where the points of the star are stretched to indicate any problem area. A second one uses a flower with the petals representing measured criteria. The better the animal welfare score, the bigger and more complete the flower. Such images help to present a clear picture of a complex issue, such as animal welfare, and allow those responsible for a quality scheme to communicate clearly with the farmer and to allow farmers to assess their performance against scores achieved nationally.
26. A Board of Agriculture representative indicated that official controls should not repeat assessments made as part of quality assurance schemes, but they will consider how these schemes could complement the system of official controls. Regulation (EU) 2017/625 requires competent authorities to consider such schemes as part of the risk basis for performing official controls from 14 December 2019.

## Conclusions

27. Certain Swedish requirements focus on animal-based outcomes whereas EU requirements are mostly focused on providing adequate resources for the animals. Animal-based requirements are more suitable than resource-based requirements for measuring the impact on animal welfare. For example the authorities score the extent and severity of common problems such as dirty cattle and pigs. The Swedish system with indicators for scoring the extent of footpad dermatitis in broilers is a good example of an animal-based indicator which meets the criteria for a relevant, accepted, credible, easy to monitor, and robust indicator. Article 3(1) and Annex III 2 to Directive 2007/43/EC require monitoring of abnormal levels of contact dermatitis but do not define any indicators or a scoring system for this monitoring.
28. The Board of Agriculture has used certain animal-based indicators for measuring the impact of rural development spending on animal welfare. By incorporating such indicators in their animal welfare measures, the Board of Agriculture can better demonstrate that the measures have achieved what they set out to achieve. Self-declarations may be less credible as an indicator than checks by a third party, but nevertheless provide useful information on the outcome of animal welfare measures.
29. The operators of quality assurance schemes, which are based on measurable animal welfare indicators and which work closely with each farmer on suboptimal issues, can demonstrate real improvements in animal welfare over a period of years. Such schemes are currently outside official controls, but have clear potential uses for identifying the risks for animal welfare, and possibly also indicators for measuring animal welfare.

## 6 OVERALL CONCLUSIONS

The Ministry's of Enterprise and Innovation strategy is based on prevention of animal welfare problems through compliance with the legislation, which in many regards is stricter than EU requirements. The Board of Agriculture has in turn set objectives to ensure good risk- based and fair controls and uses its MANCP operational objectives to monitor the performance of the twenty one county administrative boards. By focussing on the delivery of the operational objectives, the Board of Agriculture has gone a long way to achieve fair and consistent controls throughout the country. However, the focus has been to ensure that county administrative boards operate in a correct manner, rather than checking if they are doing the correct things, and the Board of Agriculture does not measure if the system as a whole meets higher level objectives. As a result all counties now use the Board's risk classification model, but the Board has not reviewed or evaluated the effectiveness or efficiency of this model, and hasn't assessed if the objective for "a good risk- based" control has been met.

Calibration exercises and a joint animal welfare control council help to achieve consistent controls and procedures for inspection are quite comprehensive. However there were two gaps in controls: a failure to communicate relevant findings from post-mortem inspections to the authority responsible for follow-up investigations, and inadequate data of mortalities in broiler flocks was sent with each flock to slaughter, as well as inadequate checking of this data.

The Board of Agriculture sends two reports on the results of inspections to the Commission annually, one on the basis of a specific reporting decision and one to satisfy a requirement of the official control Regulation. They also report to the Swedish Ministry of Enterprise and Innovation. These reports present a picture of each sector in terms of percentages of farms which were compliant/non-compliant on each legal requirement, and this data is compared with previous years. The authorities use animal-based indicators in their official controls to score the extent and severity of some of the more common problems encountered, such as dirty cattle and pigs. These scores stay at farm level and the degree of non-compliance is not reflected in reports at national level.

The system for cross-compliance with EU requirements includes an assessment of deficiencies according to their severity, extent, permanence and recurrence. This assessment gives a better picture of the significance of deficiencies than simply stating compliant/non-compliant. Again this information is not captured in national level reports, although it could be useful for analysing the seriousness of the animal welfare problems which are reported.

Regarding animal welfare measures under rural development programmes, a good practice was the use of data collected for other purposes, e.g. a quality assurance scheme, so that farmers could demonstrate the outcome of the measure. More generally, a lot of data based on animal-based indicators is collected for quality assurance schemes and official controls will need to take such schemes into account from 14 December 2019.

## **7 CLOSING MEETING**

A closing meeting was held on 17 May 2019 with representatives of the authorities, at which the main findings and conclusions of the audit were presented by the audit team.

## **8 RECOMMENDATIONS**

The Competent Authorities are invited to provide, within 25 working days of receipt of the report, an action plan containing details of the actions taken and planned, including deadlines for their completion, aimed at addressing the recommendations set out below:

<b>No.</b>	<b>Recommendation</b>
1.	<p>The authorities should review their risk classification model and ensure that it provides an effective and efficient risk basis for controls, as required by Articles 3(1) of Regulation (EC) No 882/2004.</p> <p>Recommendation based on conclusion: 10</p> <p>Associated finding: 5 and 6</p>
2.	<p>The authorities should ensure that official veterinarians monitor that daily mortality rates are sent with each broiler flock to slaughter and that the plausibility of this data is checked, as required by Article 3(1) and Annex III 1 to Directive 2007/43/EC.</p> <p>Recommendation based on conclusion: 11</p> <p>Associated finding: 8</p>
3.	<p>The authorities should ensure that when official veterinarians in slaughterhouses detect non-compliance with EU and national rules on animal welfare they take measures to communicate these results, as required by Article 5, Section I Chapter II B 1 and C and Section II Chapter I of Annex I to Regulation (EC) 854/2004, in particular to send relevant <i>post-mortem</i> inspection results.</p> <p>Recommendation based on conclusion: 11</p> <p>Associated finding: 8</p>

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

[http://ec.europa.eu/food/audits-analysis/rep\\_details\\_en.cfm?rep\\_inspection\\_ref=2019-6593](http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=2019-6593)

## ANNEX 1 – LEGAL REFERENCES

<b>Legal Reference</b>	<b>Official Journal</b>	<b>Title</b>
Reg. 882/2004 - Article 45 (MS)	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
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
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