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**

The report describes the outcome of an audit of Ireland performed from 23 November to 2 December 2020. The objective of this audit was 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 they and the agri-sector use animal welfare indicators to measure the severity, extent and permanence of animal welfare problems. This audit, which was included in DG SANTE’s work programme for 2020, was performed remotely.

The competent authority’s approach to setting objectives, planning and reporting of official controls is strategic. The animal welfare unit is, since October 2020, a stand-alone division and this demonstrates the commitment of the competent authority to address animal welfare issues and initiate improvement on the animal welfare standards. The competent authority has a systematic, focussed, evidence and risk-based approach in organising and delivering the official controls on animal welfare at the farm level. In addition, the availability of a wide range of tools, the technical knowledge, staff training and awareness, cooperation and the innovative and inclusive approach (interaction with stakeholders (research institutes, private quality assurance schemes, farmers associations)) support the system and can enhance its effectiveness.

A system for the measurement of animal welfare with the use of indicators is under development. The audit included broiler, pig and cattle sectors within its scope and at this stage there is an established indicator only for the broiler sector (footpad dermatitis).

The competent authority has not translated the objectives set out in the Multi Annual National Control Plan into operational objectives. The objectives set out in the annual business plans are not well developed and there are no clear objectives nor targets at the level of the official controls. This means that the competent authority misses the opportunity to use a measurement system to demonstrate the level of compliance with animal welfare legislation, and to determine whether they are meeting their objectives and achieving demonstrable animal welfare improvements at farm level.

There are certain shortcomings reducing the impact of the official controls in ensuring compliance with welfare requirements:

- the prioritisation of official controls does not take into account all relevant risk factors and does not define regular and appropriate frequency for the controls,
- absent and/or inconsistent documented procedures,
- inadequate enforcement of legal requirements (e.g. stocking densities on pig farms),
- lack of arrangement in place to ensure that actions are taken as a follow-up of monitoring at the slaughterhouse (broiler sector)

The report contains recommendations to the competent authority to address the shortcomings identified.
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### Abbreviations and Definitions Used in This Report

<table>
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<tr>
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<tr>
<td>AFIT</td>
<td>Agriculture Field Inspection and Testing (DAFM computer system)</td>
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<tr>
<td>AHI</td>
<td>Animal Health Ireland</td>
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<tr>
<td>DAFM</td>
<td>Department of Agriculture, Food and the Marine</td>
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<tr>
<td>DG SANTE</td>
<td>Directorate General for Health and Food Safety</td>
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<td>EU</td>
<td>European Union</td>
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<tr>
<td>FPD</td>
<td>Footpad Dermatitis</td>
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<td>MANCP</td>
<td>Multi-Annual National Control Plan</td>
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<td>PDCA</td>
<td>Plan-Do-Check-Act cycle</td>
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<td>RVO</td>
<td>DAFM Regional Veterinary Offices</td>
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1 INTRODUCTION

This audit of Ireland took place from 23 November to 2 December 2020 as part of the planned work programme of the European Commission’s Directorate-General for Health and Food Safety (DG SANTE). This audit was carried out by remote means and did not involve on-site assessments. The audit team held an opening meeting with the competent authorities on 14 September 2020. At this meeting, the audit team confirmed the objectives of, and agenda for the audit and requested additional information necessary for the satisfactory completion of the audit.

The SANTE team comprised three auditors from DG SANTE and was joined throughout the audit by representatives from the competent authority, the Department of Agriculture, Food and the Marine (DAFM).

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 European Union (EU) requirements and 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\(^1\) 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 both the agri-food sector and the competent authorities accept such indicators.

The main audit criteria are from EU legislation, which is listed in Annex 1 and specific references are provided at the start of each of the findings sections 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 Multi-Annual

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National Control Plans (MANCPs) and were developed by the MANCP network of officials from national competent authorities who meet regularly, under the chair of, and facilitated by, DG SANTE to exchange experiences in preparing, implementing and reporting on MANCPs.

The following virtual meetings were held:

<table>
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<tr>
<th>Meetings with Competent Authorities</th>
<th>Comments</th>
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<tr>
<td>Competent authority</td>
<td>Central</td>
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<td></td>
<td>Local</td>
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</table>
| Meetings with representatives of organisations contributing to the animal welfare at farms | 3 | • Animal Health Ireland (AHI);  
• the Agriculture and Food Development Authority (Teagasc);  
• the Irish Food Board (Bord Bia). |

3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation and in particular Articles 116, 117 and 119 of Regulation (EU) 2017/625 of the European Parliament and of the Council. Annex 1 contains the full legal references. Legal acts quoted in this report refer, where applicable, to the last amended version.

4 BACKGROUND

The EU's Strategy for the Protection and Welfare of Animals 2012-2015\(^2\) 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\(^3\) 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 space 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 (EU) 2017/625 requires competent authorities to plan their controls, carry out the controls according to documented procedures, verify their effectiveness and review them, as appropriate. These are essentially the same elements as prescribed in modern quality management systems, i.e. the Plan-Do-Check-Act (PDCA) cycle. When a competent authority implements these elements, we consider they are following quality management principles.

Legal requirements
Articles 5, 9, 12, 109 and 110 of Regulation (EU) 2017/625.

Findings

1. At the beginning of October 2020, DAFM enhanced its efforts to address animal welfare issues by establishing a stand-alone division/unit working solely on animal welfare (used to be a quarter of animal health division).

2. In line with the requirements of Articles 109 (1) and 110 (1) of Regulation (EU) 2017/625, the thesis for animal welfare is at the heart of the DAFM’s strategy, the MANCP. The (2018-2022) MANCP, section 1.2, includes the National strategic objectives with two of these objectives being relevant for animal welfare:

   - Objective 2: The enforcement of food and feed law, animal health and animal welfare rules and plant health rules.
   - Objective 4: The co-ordination of official controls, to ensure effective and efficient implementation at national, regional and local level official controls are carried out regularly, on a risk basis and with appropriate frequency, impartiality, quality and consistency of official controls

In addition, in section 4.1, it describes the specific objectives for animal welfare:

   - Ensure compliance with EU and national legislative requirements
   - Improve the health status of farmed animals
   - Ensure the welfare of animals on farm
There is no further description of how to achieve those objectives (by means of breaking them down to operational objectives) and how to demonstrate the extent of meeting those objectives. The authorities have not set baselines to measure the outcomes for animal welfare objectives in the MANCP. It also does not detail how the prioritisation of official controls and allocation of resources reflect those objectives contrary to the requirement of Article 110 (2) of Regulation (EU) 2017/625.

3. Despite the limitations described above, there is a well-established methodology that sets objectives and indicators in the division annual business plan. It includes a further developed set of objectives and indicators but it does not link to MANCP objectives, it does not detail how objectives will be met and objectives do not relate to official controls. In some cases, those set are not objectives but planned actions. Nevertheless, the business plan lays down a suitable methodology to set operational objectives and follows the PDCA cycle.

4. DAFM aims at ensuring consistency and quality of official controls. There is a regular training scheme for veterinary inspectors that covers animal welfare of different farm animal species, risk assessment and regulatory issues. The training arrangements comply with the requirement of Article 4(a) of Regulation (EU) 2017/625.

5. DAFM has appropriate procedures, including working instructions and checklists for the staff performing official controls on animal welfare. There are also guidelines for official inspectors and farmers on animal welfare for different sectors. This is in line with the requirements of Articles 5 and 12 of Regulation (EU) 2017/625. The inspection forms include an assessment of the species-specific welfare requirements in relevant legislation. The purpose of this documentation is to ensure that official veterinarians carrying out inspections have a good working knowledge of the animal welfare requirements and to ensure that inspections follow a consistent approach.

6. DAFM introduced a new checklist for broiler inspections that focusses on legal requirements related to footpad dermatitis (FPD). Whilst this is very comprehensive for FPD, it does not cover all the legal requirements of Council Directive 2007/43/EC e.g. mortality. This means that it cannot fully serve as the tool to ensure compliance by checking and identifying different animal welfare issues at broiler farms. In addition, there is currently no instruction/procedure in place for the performance of official controls on broiler welfare at the farms. The available material for inspectors is a training presentation dating back to 2012, which means that apart from this not being a procedure, several essential points are outdated or missing contrary to the requirements of Articles 5 and 12 of Regulation (EU) 2017/625.

7. DAFM introduced a new checklist for pig farm inspections that focusses on legal requirements related to tail docking. This too does not cover all the legal requirements of Council Directive 2008/120/EC and therefore cannot serve as a tool to ensure compliance with animal welfare requirements.
8. The competent authority has put in place a methodology to base its controls on risk. The planning process differentiates between species and it prioritises based on risks deployed by the competent authority. The central level issues lists of flocks/herds for targeted welfare inspections to DAFM’s Regional Veterinary Offices (RVOs) on an annual basis. The majority are selected on a risk basis. The parameters they use to assess risk include for example:

- Herd/flock size;
- Movement/birth/mortality rates;
- A Cross Divisional Animal Welfare Report for that herd/flock (a system identifying a herd/flock at an animal market, slaughter plant, assembly centre, etc. as a welfare risk and reporting the flock to the relevant RVO for follow up);
- Local knowledge and compliance history;
- Presence of a specific welfare indicator e.g. tail docking in pigs, FPD in broilers.

Identifying farms with a heightened risk of non-compliance and determining the reasons behind the deficiencies at farms is an evidence-based process. The available information reflects the picture at the farms and can support informed decisions on planning of official controls. However, the risk prioritisation of controls does not consider all relevant factors described in Article 9(1) of Regulation (EU) 2017/625 for risk basis of official controls. In addition, DAFM has not defined what the regular and appropriate frequency of controls is.

9. DAFM does not take into account checks carried out by the operator or those carried out by existing private quality assurance schemes. However, DAFM liaises closely with Bord Bia to include animal welfare provisions in their quality assurance standards e.g. in relation to the new Sustainable Pig Assurance Scheme which is currently being drafted.

10. The Cross-compliance Section (performing checks for the allocation of EU common agricultural policy funds) selects farms for its animal welfare cross-compliance checks based on farm mortality (calves and general farm welfare requirements) and herd size (pigs). They have produced guidance documents to assist inspectors weighing the non-compliances detected. This regularly takes into account the factors of severity (including the intent), extent and duration of the non-compliance.

11. DAFM classifies animal welfare non-compliances in three groups: minor, medium and major. For every field in the inspection checklist, guidance documents provide examples for each group of non-compliance. These examples sometimes take into account one or more of the three factors used for cross-compliance. DAFM indicated that cross-compliance inspectors report the detected animal welfare non-compliances to them. Similarly, DAFM reports the major welfare non-compliances detected to the cross-compliance inspectors. DAFM also indicated that cross-compliance inspectors could rely on their support during their controls, if necessary.
12. Bord Bia is a semi state agency under DAFM whose remit is to market and promote Ireland's food, drink and horticulture industry in Ireland and abroad. They also have the remit to write and implement quality assurance schemes and carry out the functions of a certifying body for the production of primary food products including poultry, pig and dairy products. Those standards do not use numerical indicators related to animal welfare at this stage.

13. The competent authorities (central and regional level) supervise the performance of official controls. To date, none of the audits or supervision activities (or other means of verification e.g. analysis) have assessed the system for setting objectives and indicators (measurement system) and its performance. The supervision activities lack a control verification procedure, contrary to the requirement of Article 12 (2) of Regulation (EU) 2017/625. A draft procedure for the verification of effectiveness of official controls is currently under internal consultation. DAFM officials described a challenge in ensuring consistency of official controls with a meaningful example: finding many non-compliances might mean a more thorough inspection, and/or a problematic farm. On that, each inspection report must be reviewed and signed off by the supervising officer.

In addition to the provision of training, veterinary inspectors from the Central Competent Authority will on occasion accompany RVO inspectors during welfare inspections in order to verify the correct implementation of inspections. There have been numerous on-site training/verification sessions for these inspections, the Pig Tails Pilot, Dairy Herds, FPD Visits and pre-registration of pig holdings inspections, to ensure consistency in application of new regulatory methods.

14. There is good communication and coordination between the competent authority and academic institutions and federations of the farming sector. DAFM deems consultation and collaboration with stakeholders a key to achieving animal welfare goals. Actions to ensure that farmers have good knowledge of welfare issues is consistently applied through dissemination of documentation, meetings, discussions and presentations. In addition, there is a wide range of national projects and initiatives in place that are relevant to the overall objectives for animal health and welfare set out in Ireland’s MANCP as well as in DAFM’s specific strategies. They include both DAFM led projects and those implemented by private or semi-private organisations with the support of DAFM. Included are projects and initiatives that relate directly to animal welfare as well as animal health under the one health one welfare approach.

Conclusions on management of official controls

15. The animal welfare unit is, since October 2020, a stand-alone division within DAFM. This indicates the commitment of the organisation to better focus on animal welfare issues and optimise the impact of official controls on this area. It follows a strategic approach to the setting of objectives and planning of official controls. The system for establishing measurable objectives and indicators is at an early stage of development. The business plan lays down a suitable methodology to set operational objectives and follows the PDCA cycle and thus it can serve as the tool for setting measurable objectives.
objectives and indicators and to follow-up on those.

16. DAFM has not translated its objectives into operational objectives and there is no indication on how the prioritisation of official controls and allocation of resources reflect those objectives. With this, DAFM misses the opportunity to demonstrate the level of compliance with AW legislation ensured, whether they are meeting their objectives and achieving demonstrable animal welfare improvements at farm level.

17. There is sufficient technical knowledge, staff training and cooperation within DAFM and with stakeholders. The availability and development of documented planned arrangements empower the system and provide a basis for an effective implementation of controls. In some areas, however, there is a lack of a procedure (broiler, control verification procedure), or procedures are inconsistent, as they do not consider all relevant legal requirements.

18. The evidence and risk-based prioritisation system for official controls is systematic and focussed but it does not consider all necessary factors and has not defined the regularity and appropriate frequency of the official controls. Therefore, they might use wrong or incomplete assumptions when selecting the farms to control.

19. The official controls could benefit from a similar methodology to that used by cross compliance inspections as regard conclusions on severity, extent and permanence of non-compliances detected as this would give a better overall impression of animal welfare conditions on farm.

5.2 REPORTING OF CONTROLS

Under EU requirements, and until 2019, Member States had to submit three different types of reports addressing animal welfare: a report on the implementation of the MANCP; a report on inspections carried out to verify compliance with Directive 2007/43/EC (the "Broiler Directive") and, as required by Commission Decision 2006/778/EC, a report of inspections at farm level. From 2021, Commission Implementing Regulation (EU) 2019/723 replaces these reports, by a standard model form including information and data on the welfare of animals kept for farming purposes. It also requires the Member State to analyse the major non-compliances detected, prepare an action plan, and an overall conclusion on the level of compliance achieved. There may also be internal or national requirements for other reports that the competent authority has to satisfy. These reports have slightly different purposes and therefore, their contents are different. However, they share one common objective: to describe whether the Member States achieved their animal welfare objectives during the reporting period.

Legal requirements

Findings

20. The Agriculture Field Inspection and Testing database (AFIT) is a DAFM computer system used to record all inspections carried out by DAFM staff, including outcomes of inspections. AFIT records the details of the inspection, and in cases of non-compliances, the findings, the type of non-compliance, and its drivers, its severity and the follow-up action taken. The structure of AFIT presents certain challenges in the reporting of data as envisaged for the MANCP report under Regulation (EU) 2017/625; the system was originally developed to provide the reports required by Commission Decision 2006/778/EC. The authorities need to review and update AFIT required to facilitate reporting as part of the MANCP Annual Report. DAFM plans to complete this during 2021.

21. DAFM provides the Commission with an annual report (most recent was for 2019) on the implementation of the MANCP as required under Article 113(1) of Regulation (EU) 2017/625. None of these annual reports has included an assessment of the extent to which the country achieved the objectives it set.

22. Currently, DAFM does not use the data in AFIT to calculate national average scores (e.g. FPD). They plan to analyse the available information to determine trends and identify patterns of deficiencies and reflect the overall national status of animal welfare at farms. For that, AFIT needs to be upgraded to support the measurement system for welfare indicators. However, DAFM has at their disposal a wide range of electronic data that cover the farms and give clear picture of certain animal welfare related aspects (e.g. stocking densities).

23. In this respect, the system follows the use of an evidence-based approach by making use of the existing statistics, administrative data and the proposed monitoring framework. Reporting of welfare issues found in the broiler slaughterhouses provides an informational basis for the RVOs that receive it. However, to be effective, this aspect requires clear guidance and an appropriate follow-up mechanism so that in certain cases farms that present a certain degree of animal welfare deficiencies undergo closer monitoring and if needed inspections and further enforcement. The lack of arrangements in this respect and the non-binding nature of the reports forwarded from slaughterhouses means that DAFM does not take corrective actions based on these reports. This is not in line with the requirements for follow-up described in Annex III to Directive 2007/43/EC and reduces the impact of the official controls.

24. Similar to the broiler sector (finding 23), DAFM does not always ensure that pig holdings comply with the requirement laid down on Article 3(1) of Council Directive 2008/120/EC on stocking densities, as, on the basis of the data presented, there is strong evidence of overstocking on pig farms.

25. Most recently introduced (November 2020), the Intact Tails Programme aims to address the issue of routine tail docking in Irish pig farms. Nearly all commercial herds in Ireland rear pigs with docked tails contrary to the requirements of Directive
2008/120/EC. A new ante mortem/post mortem system will provide data for herds presenting pigs with docked tails for slaughter. DAFM envisage that in the future, these data will inform the risk-based approach applied to regulatory visits. At the moment, since the number of commercial pig herds in Ireland is not large, a randomised, area-based approach is used for selecting herds for Intact Tails visits.

26. A new Dairy Cow Inspection Programme rolled out in the end of 2020 uses Animal Identification and Movement (AIM) data on births and movements as welfare indicators. The goal is that these data shall provide a robust method of identifying welfare risk in Dairy Herds. These programmes are designed to provide sufficient baseline data to allocate targets and goals in these key areas of animal welfare.

Conclusions on reporting of controls

27. DAFM has put in place a range of tools and developed methodologies in order to gather information and report the results of the official controls internally and to the stakeholders, including the EU Commission. Reporting does not fully support the development and use of indicators, which means that DAFM misses the opportunity to integrate the available data and tools in order to reflect the overall status of animal welfare at farms and improve it.

28. The inadequate enforcement of certain legal requirements (pig stocking densities, routine tail docking in pigs) and the lack of arrangements to ensure that actions are taken as a follow-up to monitoring at the slaughterhouse (broiler sector) reduce the effectiveness of the official controls.
5.3 ANIMAL WELFARE INDICATORS

A Commission funded project: "Welfare Quality", has developed principles and indicators for assessing the welfare of farm animals\(^4\). 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 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

Point 8 of Chapter I of Annex I to Directive 2008/120/EC

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


Findings

29. Recently, DAFM has begun to focus on specific welfare indicators in the pig and broiler sectors, particularly FPD (since 2017) and tail docking in pigs (November 2020). They have developed specific inspection forms and procedures to assess welfare deficits associated with these indicators.

30. The FPD Programme for broilers uses slaughter plant data since 2017 and is designed as follows:

- Each incidence over 50% FPD in a slaughter cohort triggers a welfare notification that is received centrally. Previously, the cut-off point was 70% but it was amended reflecting improvement of the recorded performance.

- This notification is collated in a database to generate a league table of flocks or houses. At RVO level, they choose the flocks or houses at the top of the league—i.e. the ones with more problems. The officials open a FPD "Case" for the flock/house identified. The Case is followed with a regulatory visit and either the farm takes effective measures to address the welfare deficits identified or the officials close the house until the operator submits an action plan dealing with the outstanding welfare deficits.

- Following an FPD visit, the farmer is informed of the observations made and the welfare deficits identified. If the officials raise observations on three visits then

they identify the flock house as non-compliant. In this way, the number of houses that are persistently associated with FPD will decrease over time. Thus, a baseline of FPD incidence has been established.

- The current target is to achieve the elimination of 5-10 flock houses each year from the top of the league table.

The described methodology is not formalised in a procedure nor is FPD referred to in the MANCP or linked to a strategic objective.

31. Animal Health Ireland (AHI) described the use of benchmarking and relevant communication to farmers as a means of informing and at the same time motivating them to improve the animal welfare status at their farms. This approach has worked well in animal health related issues. As regards dairy cattle, based on the results of the AHI mastitis project, somatic cell count could be used as an indicator.

32. The Animal Welfare Division is developing new approaches to the regulatory challenge. As outlined above, these are designed around the use of tools for specific welfare issues. This approach is further enhanced by determining each visit event as part of a “Case” in the case of the Intact Tails Programme and FPD Programme for example. Each Case comprises of up to four visits, each the same as the previous one. In this way of appraisal, specific welfare deficits are observed and recorded. Progress is identifiable and poor compliance is subject to time limits. This multifactorial approach across a broad but focussed range of potential welfare deficits will be central to delivering on measurable goals for welfare.

33. DAFM veterinary inspectors described a wide range of indicators (beyond FPD) that are relevant to broiler welfare at the farm. They highlighted the number of dead birds that remain in the shed without being removed, dirtiness score and avoidance distance test indicator.

34. DAFM discussed the main challenges they face in developing and implementing policies and objectives related to animal welfare controls. Brexit has been the greatest priority for Ireland so resources are heavily directed to this. Consequently, DAFM cannot develop its IT systems for animal welfare as quickly as they would like, nor redirect the required human resources to the animal welfare sector. The main issues are:

- Availability and use of resources necessary to carry out the controls and for the entire process of analysis of the data resulting from these controls. This would also contribute to a better definition of animal welfare indicators, as well as to a closer and continuous monitoring of farms.
- Improvement and further development of IT tools that support recording, analysing and processing data.
- The challenge of achieving progressive, meaningful engagement and uptake of schemes aimed at improving animal welfare on farms, particularly by the pig sector.
The need to ensure sufficient resource to achieve effective implementation of the requirements of Regulation (EU) 2017/625 and Implementing Regulation (EU) 2019/723.

Conclusion on animal welfare indicators

35. The measurement system mainly covers the broiler (FPD is an already established indicator) and pig sectors and it is still under development. The competent authority has not yet used indicators as a strategic tool or set objectives to decrease unsatisfactory scores. If the competent authority develops the system further and implements it properly, it is likely it could use it to improve the effectiveness of the official controls.

6 Overall Conclusions

DAFM’s approach to setting objectives, planning and reporting of official controls is strategic. The animal welfare unit is, since recently (October 2020), a stand-alone division and this demonstrates the commitment of the competent authority to address animal welfare issues and initiate improvement on the animal welfare standards. The competent authority has a systematic, focussed, evidence and risk-based approach to organising and delivering the official controls on animal welfare at the farm level. In addition, the availability of a wide range of tools, the technical knowledge, staff training and awareness, cooperation and the innovative and an inclusive approach (interaction with stakeholders (research institutes, private quality assurance schemes, farmers associations)) support the system and can enhance its effectiveness.

A system for the measurement of animal welfare with the use of indicators is under development. The audit included broiler, pig and cattle sectors within its scope and at this stage there is an established indicator only for the broiler sector (footpad dermatitis).

The competent authority has not translated the objectives set out in the Multi Annual National Control Plan into operational objectives. The objectives set out in the annual business plans are not well developed and there are no clearly set objectives nor targets at the level of the official controls. This means that the competent authority misses the opportunity to use a measurement system to demonstrate whether compliance with animal welfare legislation is ensured and to determine whether they are meeting their objectives and achieving demonstrable animal welfare improvements at farm level.

The impact of the official controls is reduced due to the following shortcomings:

- the prioritisation of official controls does not take into account all relevant risk factors and does not define regular and appropriate frequency for the controls;
- absent and/or inconsistent documented procedures;
- incomplete coverage of legal requirements (e.g. stocking densities on pig farms);
- lack of arrangements in place to ensure that actions are taken as a follow-up of monitoring at the slaughterhouse (broiler sector).
The report contains recommendations to the competent authority to address the shortcomings identified.

7 CLOSING MEETING

At the closing meeting on 1 December with representatives of the competent authority, the SANTE team presented the main findings and conclusions of the audit. The competent authority accepted the audit findings and offered additional information.

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:

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<th>No.</th>
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<tr>
<td>1.</td>
<td>To ensure that the prioritisation of controls and allocation of resources for animal welfare reflect the objectives of the Multi-annual National Control Plan (MANCP) as required in Article 110(2)(a) of Regulation (EU) 2017/625. Recommendation based on conclusions: 16 Associated findings: 2, 30</td>
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| 2.  | To ensure that, in accordance with the requirements of Article 5 and Article 12(1),(2) of Regulation (EU) 2017/625, they have:  
  - procedures and/or arrangements to ensure the impartiality, quality and consistency of official controls and other official activities at all levels;  
  - procedures and/or arrangements to ensure the effectiveness and appropriateness of official controls and other official activities; and  
  - control verification procedures. Recommendation based on conclusions: 16, 27, 28 Associated findings: 6, 7, 13, 23, 30 |
<p>| 3.  | To ensure that the prioritisation of official controls considers all risk factors and defines the regular and appropriate frequency of official controls in line with Article 9(1) of Regulation (EU) 2017/625. Recommendation based on conclusion: 18 Associated finding: 8 |
| 4.  | To ensure the findings from monitoring of broiler welfare at the slaughterhouses are properly follow up at farm level, in line with Annex III to Directive 2007/43/EC. |</p>
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<tr>
<td></td>
<td>Recommendation based on conclusion: 28</td>
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<td></td>
<td>Associated finding: 23</td>
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<tr>
<td>5.</td>
<td>To ensure that the stocking densities of pig holdings comply with requirements laid down in Article 3(1) of Council Directive 2008/120/EC and that farmers comply with the provision of the same Directive on the prohibition of routine tail docking.</td>
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<td></td>
<td>Recommendation based on conclusion: 28</td>
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<td>Associated findings: 24, 25</td>
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</table>

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

## ANNEX 1 – LEGAL REFERENCES

<table>
<thead>
<tr>
<th>Legal Reference</th>
<th>Official Journal</th>
<th>Title</th>
</tr>
</thead>
</table>