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Directorate F - Food and Veterinary Office

DG(SANCO)/7544/2005 – MR Final

**FINAL REPORT OF A MISSION  
CARRIED OUT IN PORTUGAL  
FROM 14 TO 18 FEBRUARY 2005  
CONCERNING ANIMAL WELFARE ON FARMS  
AND DURING SEA TRANSPORT**



## EXECUTIVE SUMMARY

*This report provides the outcome of a mission carried out by the Food and Veterinary Office (FVO) in Portugal between 14 and 18 February 2005.*

*The objective of the mission was to evaluate the implementation of EU requirements regarding the welfare of pigs and laying hens and to follow-up on certain actions undertaken in response to previous FVO missions on animal welfare, in particular regarding sea transport of bovine animals.*

*The report concludes that although there is a system of control agreed between central level and the regions, a satisfactory methodology for inspections of farms has not yet been fully adopted. The inadequate legal basis for requirements for pig farms in particular confounds the controls taking place and the system for imposing sanctions is not effective in ensuring that requirements are respected.*

*Regarding sea transport from the Azores islands, further progress has been made; however, actions have not been sufficient regarding adequate protection against sea and weather.*

*The report makes a number of recommendations addressed to the Portuguese competent authorities, aimed at rectifying those shortcomings identified.*



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## ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

Artt.	Articles in legislative texts
CA	Competent Authority
CCA	Central Competent Authority
CPSIPA	Co-ordination Committee of the Animal Protection Integrated System ( <i>Commissao Permanente do Sistema intergrado de Protecção Animal</i> )
DGV	Veterinary Directorate General ( <i>Direcção Geral de Veterinária</i> )
DIV	Veterinary Intervention District ( <i>Divisão de Intervenção Veterinária</i> )
DRA	Agriculture General Direction ( <i>Direcção Regional de Agricultura</i> )
Dry sow	Breeding female pig from the time piglets are weaned until the subsequent farrowing.
EEC	European Economic Community
EC	European Community
EU	European Union
FVO	Food and Veterinary Office
Lux	Unit of illumination
VI	Veterinary inspector



## 1. INTRODUCTION

The mission took place in Portugal from 14 to 18 February 2005, as part of the planned mission programme of the Food and Veterinary office (FVO).

The mission team comprised two inspectors from the FVO and one national expert, and was accompanied during the whole mission by a representative from the central competent authority (CCA), the Veterinary Directorate General (*Direcção Geral de Veterinária-DGV*) of the Ministry of Agriculture.

An opening meeting was held on 14 February with the CCA as well as representatives of the regions to be visited during the mission. At this meeting, the objectives of, and itinerary for, the mission were confirmed by the inspection team, and additional information required for the satisfactory completion of the mission requested.

## 2. OBJECTIVES

The objective of the mission was to evaluate the implementation of EU requirements regarding the welfare of pigs and laying hens and to follow-up on certain actions undertaken in response to previous FVO missions on animal welfare, in particular regarding sea transport of bovine animals. In pursuit of this objective, the following meetings were held and sites visited:

VISITS			Comments
Competent authority	Central level	2	Opening and closing meetings
	Regional level	2	The regional offices of <i>Ribatejo Oeste</i> and <i>Beira Litoral</i> . Reports were selected among those with deficiencies during years 2003 and 2004.
	District level	1	The District office responsible for sea transport controls.
Farms		4	One caged holding for laying hens in <i>Beira Litoral</i> . Three breeding and fattening farms for pigs were selected from the list of farms inspected in 2004.
Port		1	Where cattle from the Azores arrived after transport by sea.

## 3. BACKGROUND

Previous FVO missions on animal welfare in Portugal were carried out on pig farms in 1999 and on transport in 2001 and 2003<sup>1</sup>. The CCA did not provide a response, as requested, to the recommendations in report 1022/1999 or 3311/2001. In response to a further recommendation in report 9039/2003, the CCA indicated that training concerning fitness for transport and handling of animals before and during the journey was planned for farmers sending livestock from the Azores and that controls at the place of departure were to be enhanced. In 2004, the FVO was also informed that an inspection procedure for pig holdings had been agreed with the regions.

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<sup>1</sup> See report DG(SANCO)/1022/1999, DG(SANCO)/3311/2001 and DG(SANCO)/9039/2003 [http://europa.eu.int/comm/food/fvo/index\\_en.htm](http://europa.eu.int/comm/food/fvo/index_en.htm), hereafter: reports 1022/1999, 3311/2001 and 9039/2003.

#### 4. LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation, in particular Artt. 9 of Directives 99/74/EC<sup>2</sup>, 91/630/EEC<sup>3,4</sup>, Article 10 of Directive 91/628/EEC<sup>5</sup>, Article 7 of Council Directive 98/58/EC<sup>6</sup> and Commission Decision 98/139/EC<sup>7</sup>.

#### 5. MAIN FINDINGS

##### 5.1. Legislation

National legislation (Decree 135/2003) transposing the amendments to Directive 91/630/EEC was slightly delayed: 28.6.2003 instead of 1.1.2003. There was a major delay in the transposition of Directive 99/74/EC into national legislation (Decree 72-F/2003): 14 April 2003 instead of 1.1.2002, and Directive 2002/4/EC on the registration of establishments keeping laying hens, was also transposed in this text. Although a comprehensive check of the legislation was not carried out, it was noted that:

- Decree 135/2003, which transposes Directive 91/630/EC, applies to intensive breeding and fattening of pigs instead of confined pigs (as laid down in Article 1 of 91/630/EEC). “*Intensivo*” is the word in the Portuguese translation of Directive 91/630/EEC and consequently holdings with less than 20 sows or less than 200 fattening pigs are excluded from the scope of national requirements. The English version of Directive 91/630/EEC applies to pigs confined for rearing and fattening and does not restrict this to intensive production systems.
- Decree 135/2003 provides space allowances only for holdings built or rebuilt after 28.6.2003, whereas Article 3, 1(a) of 91/630/EC provides requirements applicable to all holdings.

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<sup>2</sup> Council Directive 99/74/EC laying down minimum standards for the protection of laying hens: L 203, 3.3.99, p. 53.

<sup>3</sup> Council Directive 91/630/EEC laying down minimum standards for the protection of pigs, OJ L 340, 11.12.1991, p.33-38, (hereafter: Directive 91/630/EEC).

<sup>4</sup> Legal acts quoted in this report refer, where applicable, to the last amended version.

<sup>5</sup> Council Directive 91/628/EEC on the protection of animals during transport: OJ L 340, 11.12.1991, p. 17.

<sup>6</sup> Council Directive 98/58/EC concerning the protection of animals kept for farming purposes: L 221, 8.8.98, p. 23.

<sup>7</sup> Commission Decision 98/139/EC of 4 February 1998 laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in the Member States OJ L 38 of 12.02.1998, p. 10.

## 5.2. Competent Authority

The structure of the CA is described in previous mission reports. The Animal Health section of the DGV is the central level responsible for the registration of holdings, including requirements of Directive 2002/4/EC<sup>8</sup>.

In the context of the current mission, the Co-ordination Committee for Animal Welfare (*Comissao Permanente do Sistema Integrado de Proteccao Animal* or CPSIPA) has provided instructions and guidelines on animal welfare inspection.

Twice during 2003 the CCA provided a one week training course on protection of farm animals for inspectors of the regions. Animal welfare was also a topic of one of the modules of six hygiene inspection courses of 2003 and 2004. The CCA also provided training to the "Nature and Environment" division of the police (*Guardia Nacional Republicana*) which can perform inspections in the field of animal protection.

## 5.3. Information to the pig and laying hen sectors

The CCA is working with farmer associations to produce a manual on pigs, hens and transport welfare. The CCA organised seminars with egg producer associations in 1999 and 2002 on the new legislation for laying hens and the registration of farms.

A protocol for co-operation between the CCA, the National Institute of Agriculture Research and the National Association of Egg Producers for a study on laying hens in enriched cages is in preparation. The CCA indicated that if the outcome is positive, something similar will be started in relation to pigs, with the aim of producing an integrated management system.

Although the CAA instructed the regional inspectors to assess the extent of training undertaken by farmers, this was not emphasised during the visits. In addition, the inspection team noted that structured training courses for stock persons (Article 5a of 61/630/EC) were not available.

In *Beira Litoral* the regional CA provided information on pig welfare through articles published in sector association magazines in 2000 and 2001. A further publication is foreseen on the impact of the new requirements in the pig breeding sector, in particular the group housing of sows. A leaflet on handling of free range pigs was also published and two seminars, partially concerned with animal welfare, were held in 2001 and 2002. In *Ribatejo Oeste* a representative indicated that they have not provided any information to farmers.

A representative of the CCA indicated that, as the sector producers association did not recommend it, no pig farms were built or rebuilt after 1.1.2003. However, there was no system of surveillance to ensure that this deadline was respected. A representative of the regional CA was not clear that stalls cannot be brought into service on refurbished holdings.

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<sup>8</sup> Commission Directive 2002/4/EC of 30 January 2002 on the registration of establishments keeping laying hens covered by Directive 99/74/EC: OJ L 30, 31.1.2002, p.44.

A CCA representative indicated that egg producers were informed that the installation of unenriched cages after the deadline is not permitted; the check list also mentions that installation after 14.04.2003, which is the date in national legislation, is prohibited.

#### **5.4. Inspection programme**

In response to recommendations in report 9039/2003, the CCA indicated that they will carry out quality controls of the work of veterinary inspectors (VIs) and technicians and that the outcome of this assessment would be submitted quarterly to the Co-ordination Committee and to the regional CAs. A CCA representative indicated that they supervise the checks in the regions, performing inspections on their own or jointly with the regional CA. Although quarterly reports were not made, the outcome of inspections are discussed at the Co-ordination Committee meetings and included in their yearly reports.

The target for inspections, which is set in national legislation, is 5% for pig farms and 10% for laying hen farms. Following agreement from the Co-ordination Committee, guidelines and checklists have been provided and the holdings to be inspected are selected by this Committee every year. Farms are mostly chosen on a random basis but are also targeted on the basis of previous problems or suspicion of non-compliance. A new computerised database to record the outcome of inspections is not fully in place due to budgetary restrictions, but computer compatible check lists have been produced and should be in use in 2005.

Except for checks of pig farms in *Ribatejo Oeste*, targets were achieved in both regions in 2003 and 2004. The shortfall arose as staff had to deal with controls on nitrofurans and confirm herd records following the death of animals in forest fires.

The inspection team noted that:

- Quality control of the work of VIs and technicians, which was the action indicated in response to a recommendation in report 9039/2003, has not taken place.
- As national legislation only applies to pig farms which are considered to operate intensive production systems, the smaller pig farms are not included for a possible inspection. The selection for inspection is therefore based on 15% of farms in *Ribatejo Oeste* and 10% of farms in *Beira Litoral*, whereas the requirements of Directive 91/630/EC are applicable to all holdings where pigs are confined for rearing and fattening

#### **5.5. Checks of holdings with pigs**

The CCA indicated that a new check list form (in accordance with Decree 135/2003) is in use since the end of 2003 and an instruction summarising the issues to be checked was issued in 2005. The current check list and instruction sets limits for environmental conditions such as levels of ammonia and humidity.

The inspection team noted that:

- In *Ribatejo Oeste* deficiencies were found in four out of nine farms inspected in 2003 and warning letters were issued but no sanctions imposed. Only one report

of these four farms with deficiencies was available at the regional office. Contributions from this region to the report required by Decision 2000/50/EC<sup>9</sup> were not available. In *Beira Litoral* 25 farms were inspected in 2004. Deficiencies found mostly related to mortality records, medical treatment books, back-up system for ventilation and general state of repair and cleaning.

- An inadequate previous check list, which did not include recent requirements, was used on several occasions at the end of 2004. Although the amended check list allows recording of dates of construction or reconstruction, which is essential information in relation to which requirements apply, in most cases this was not filled in.
- On one farm the CA indicated that before 1.1.2006 sows tethered in single stalls must be relocated into new stalls or group housing.
- In all pig farms visited there were some improvements in relation to the previous year's visit, although some deficiencies remain to be corrected as this was still within the deadline imposed by the CA. On the three farms, two overstocked pens were detected and a third pen, although overstocked, was not noticed by the local inspector. Restriction of some sows, in particular with movable bars at the back of the farrowing crate, was similarly not detected. Point 7 of the Annex of Directive 98/58/EC requires that the movement of the animals must not be restricted in such a way as to give rise to unnecessary suffering or injury.
- The openings and slats of new concrete floors of a farm were not measured to check if they complied with the new requirements (Article 3, (2)(b) of 91/630/EEC) as the CA considered that the new requirements did not apply.
- The CCA did not respond to a recommendation in report 1022/1999 asking them to actively encourage farmers to find ways of reducing the need to tail dock piglets. Although the guidance from 2005 asked for an investigation of this issue, there were no further details on the requirements surrounding this issue and the farmer was consequently not asked to provide a justification for this practice during the inspections (Directive 91/630/EEC, Annex, Chapter I, 8).
- Although the checklist does refer to the provision of enrichment material, deficiencies in relation to this were not pointed out to the farmer. The CCA representative indicated that this is difficult to implement, due to hygiene and economic considerations. The provision of fibrous food for dry sows was similarly included in the checklist but not raised with the farmer.
- Presence of bedding in sick pens was not routinely checked and in one particular was not sought as a measure to reduce aggression between pigs, which were not fully healthy and which had been grouped together in a sick pen (point 3 of Chapter II, D of Directive 91/630).

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<sup>9</sup> Commission Decision 2000/50/EC of 17 December 1999 concerning minimum requirements for the inspection of holdings on which animals are kept for farming purposes: OJ L 19, 25.01.2000, p. 51

## 5.6. Checks of holdings with laying hens

To complete the registration of holdings (Directive 2002/4/EC), farmers provided the necessary information, including the maximum capacity, in a self declaration to the Animal Health Section of the DGV. The CA verifies the stocking density when the holding is inspected. Although the CCA indicated that 95% of the 200 registered holdings in Portugal have been inspected at least once, the number inspected according to 99/74/EC requirements was unavailable.

The Co-ordination Committee issued guidelines for inspections according to 99/74/EC in 2004, including drawing of technical requirements for cages. The CCA indicated that they have performed 101 inspections of laying hen holdings on their own or together with the regional services in 2003 and 2004. Most deficiencies in 2004 concerned overstocking of cages, lack of records of mortalities and medical treatment, and lack of claw shortening devices.

The inspection team noted that:

- A holding in *Ribatejo Oeste* installed non enriched cages after both the EU and the national deadline. Due to several problems including overstocking, which were detected in August 2003, legal proceedings had already been initiated against this farmer, but not yet concluded. Subsequent to this infringement, a new and a rebuilt house were brought into operation without a licence and unenriched cages had been installed. Another infringement procedure was launched. A representative of the CA indicated that no other punitive measure (e.g. withdrawal from register, refusal of permission to repopulate) is possible until such legal procedures are finished.
- At the end of 2004 a check list with only the old space requirement was used. Another check list was also used which indicated both new (550 cm<sup>2</sup>) and old (450 cm<sup>2</sup>) space allowances<sup>10</sup>. In *Ribatejo Oeste* overstocking was found in 28% of farms inspected in 2003 and in *Beira Litoral* overstocking was found in 11% of farms in 2004. Overstocking was a repeated finding in inspection reports for one particular holding in both 2002 and 2004. On the farm visited, overstocking had been previously detected, but the farmer had not been notified of this deficiency. During the inspection marginal overstocking was found, but the CCA accepted the justification that this surplus of 1.1% was to make up for deaths in transport. Obstacles in the cages were not taken into account in measuring cage height.
- Forced moulting was performed in one farm visited. The flock-keeper explained that the procedure takes 30 days in total: feed is removed for 15 days and is given back gradually; no water is given for the first three days and is again gradually re-introduced. Light is also reduced until the birds stop laying and the dark period extends for a few days. When eggs production resumes, light is increased gradually and high energy feed is given until normal production is achieved.

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<sup>10</sup> In their comments on the draft report, the CA indicated that these checklists were prepared during a period of transition in legislative requirements and there were some flocks had been in production for more than one year when it was permissible for birds to be provided with 450 cm<sup>2</sup> each.

## 5.7. Checks on sea transport

Regarding transport by sea, some progress was seen between mission 3311/2001 and 9039/2003. At the time of the last mission certain deficiencies persisted, particularly concerning provision of adequate water and foodstuffs, protection against the weather, and that containers were clean and adequately bedded. In response to the recommendations in report 9039/2003 the CA indicated that:

- They organised training sessions for the CA from the Azores islands and the transporters in March 2004. Farmers there also undertook a course, which is mandatory in order to get subsidies, and included a module on animal welfare.
- They issued instructions and check lists, of which a new electronic format is under test. They maintain a list of licensed containers with identity number, date of authorisation and species allowed.
- CA technicians are always present at the place of departure and check the fitness of the animals for transport, documents and loading densities of containers.
- The most common deficiencies were wet bedding and sporadic cases of slight overstocking. Deficiencies are notified to the Azores CA, who collect the information and send this to the CCA for a decision on the appropriateness of a sanction.

The inspection team noted that:

- In 2003, 71% of the inspections were documented and 18% of inspections had deficiencies, whereas in 2004, 32% of inspections were documented and 20% had deficiencies. Although the incidence of documented inspections was lower in 2004 than in 2003, the CA indicated that every ship was checked and in most cases it is possible to correct the deficiency immediately. No sanctions were imposed.
- There was systematic communication from the CAs of departure to the CA of destination so that the latter are aware of the details of arriving consignments. Official controls in place of departure have been enhanced with the use of standard inspection procedures indicating clearly the criteria to be checked.
- Provisions for feed (straw and hay) are recorded in the journey plan (“*plan de viagem*”) signed by the captain. Although the provision of feed and water was adequate, the time of departure and the total number of animals were not indicated in this document.
- During the visit, the VI found that not all the 21 containers were adequately protected from the weather, two containers had insufficient bedding and in another animals of different ages were mixed together. A representative of the CA explained that the captain would decide on the positioning of containers to take account of weather conditions. This was seen to be insufficient to ensure adequate protection for animals placed in containers facing the sea.

- Although the instrument for emergency slaughter was not on board the vessel, the captain indicated that such a device was already ordered.
- During unloading, containers were handled with care and trucks for bringing animals to their final destination were already at the port to avoid unnecessary delays.

## **6. CONCLUSIONS**

### **6.1. Legislation**

- 1) Although this has arisen from an error in the Portuguese version of Directive 91/630/EEC, the exclusion of holdings with less than 20 sows or less than 200 fattening pigs from the scope of national legislation does not comply with the English version of Directive 91/630/EEC.
- 2) Due to errors in the transposition of Directive 91/630/EEC space allowances are not applicable to holdings built before 28.6.2003, whereas certain requirements should apply to such holdings.

### **6.2. Competent Authority**

- 1) Initiatives by the CCA such as their involvement in studies on new technologies and the development of guidance for farmers, demonstrate a commitment to achieve better compliance. However, the CA has not ensured that appropriate training courses are available to farmers, which is a requirement in relation to pig stockpersons (Article 5a of 61/630/EC).
- 2) The methodology for inspections has improved significantly from the time of report 1022/1999, with all levels involved in their development and execution. However, a commitment given following report 9039/2003 to carry out quality control of the work of inspectors has not been implemented.
- 3) There has been continued progress with the co-ordination of activities between regional and central level. However, most of the protocols drawn up by this body are recent and are not yet fully implemented by the regions. In addition, these protocols do not cover all aspects of enforcement, in particular regarding follow-up actions, including sanctions where necessary.

### **6.3. Checks of holdings with pigs**

- 1) New requirements are not respected on holdings brought into service after 1.1.2003, as the CA did not apply requirements such as for concrete floors in refurbished buildings and there is confusion regarding the systems which can be used for dry sows.
- 2) Guidelines for inspections have improved; however, there is still not adequate instruction regarding the requirements for tail docking, which was also the subject of a recommendation in report 1022/1999.
- 3) Although issues such as environmental enrichment for all pigs and provision of fibrous food for sows are included in the instruction to inspectors, these were not adequately addressed on the spot, which further indicates the necessity of supervision, or quality control, of inspections.

#### **6.4. Checks of holdings with laying hens**

- 1) Enforcement of Directive 99/74/EC is not sufficient as there are recurring problems with overstocking and punitive measures are limited even where serious infringements occur such as the installation of unenriched cages after the ban.
- 2) Although guidelines and instructions have been improved, the methodology for inspections is not yet fully satisfactory with inappropriate check lists continuing to be used. The use of previous checklists could result in deficiencies such as overstocking not being detected.
- 3) Acceptance by the CA of forced moulting does not take account of Article 3 of Council Directive 99/74/EC and points 11, 14, 15 and 16 of the Annex of Council Directive 98/58/EC, which makes such a practice contrary to EU law.

#### **6.5. Checks on sea transport**

- 1) There has been further progress in obtaining better compliance with the requirements of 91/628/EEC regarding transport of cattle in containers by sea. In particular, improvements have been made with checking of feeding, bedding and control of space allowance and communication between place of departure and destination has been improved.
- 2) Actions have been inadequate to ensure an instrument for emergency slaughter is on board the sea vessel; although this should be easily solved. Adequate protection against weather and sea is an issue which requires further efforts on the part of the CA.

#### **6.6. Overall conclusion**

1. Although there is a system of control agreed between central level and the regions, a satisfactory methodology for inspections has not yet been fully adopted. The inadequate legal basis for requirements for pig farms in particular confounds the controls taking place and the system for imposing sanctions is not effective in ensuring that requirements are respected.
2. Regarding sea transport from the Azores islands, further progress has been made; however, actions have not been sufficient regarding adequate protection against sea and weather.

### **7. CLOSING MEETING**

A closing meeting was held on 18 February 2005 with representatives of the CA. At this meeting, the main findings and conclusions of the mission were presented by the inspection team. The representatives of the CA did not express any major disagreement with these and indicated that they would address the areas of non compliance as soon as possible. They also provided clarification on some of the issues discussed, and indicated forced moulting is not specifically banned by EU requirements and that there are different methods to achieve this.

## 8. RECOMMENDATIONS TO THE COMPETENT AUTHORITIES

The Competent Authorities are requested to take actions to address the following recommendations. This should include a timetable for the completion of these actions and should be done within 25 working days of receipt of the final mission report.

- 1) Amend legislation so that
  - a. The minimum standards apply to all pigs confined for rearing and fattening as laid down in Article 1 of Directive 91/630/EEC.
  - b. Article 1, 2(a) Annex, Chapter I, Section I of the Decree 135/2003 concerning the unobstructed floor area is applicable to holdings as laid down in Article 3, 1(a) of 91/630/EC.
- 2) To ensure that appropriate training courses are available to pig farmers as required by Article 5a of Directive 61/630/EEC.
- 3) To take measures to improve enforcement actions when deficiencies are detected. In particular, punitive measures need to be taken in a timely manner where inappropriate systems have been installed after the deadline of 1.1.2003 (Directive 99/74/EC, Chapter II Article 5, 2 and Article 3 of Directive 61/630/EEC) and where recurring problems such as overstocking are detected (Directive 99/74/EC, Chapter II, Art. 5, 1).
- 4) Take measures, such as implementing the previous commitment to carry out quality control of inspectors, so that all aspects of EU legislation are adequately inspected.
- 5) Regarding checks of pig holdings, take measures:
  - a. So that holdings built or rebuilt after 1.1.2003 meet EU requirements, in particular Article 3 (1b), (2), (4) and (5) of Directive 91/630/EEC.
  - b. So that, as previously recommended in report 1022/1999, requirements applicable to tail-docking and environmental enrichment are addressed (Directive 91/630/EEC, Annex, Chapter I, 4 and 8).
  - c. So that sick or injured pigs are dealt with appropriately (Chapter II, D of Directive 91/630 and point 4 of the Annex of Directive 98/58/EC).
- 6) Regarding checks of holdings with laying hens, take measures:
  - a. So that the appropriate space requirements are applied (Directive 99/74/EC, Chapter II, Art. 5, 1) and inappropriate checklists are taken out of use.
  - b. So that obstacles in the cages are taken into account when measuring cage height (Directive 99/74/EC, Chapter II, Art. 5, 4)
  - c. To prevent forced moulting which does not meet the requirements of Article 3 of Council Directive 99/74/EC and points 11, 14, 15 and 16 of the Annex of Council Directive 98/58/EC, and where such practices are found to be unsatisfactory, to apply appropriate punitive measures.

- 7) Regarding transport of animals by sea, and as previously recommended in reports 3311/2001 and 9039/2003, take steps to ensure:
- a. That there is adequate protection against weather and sea (point 18 Chapter I.D of the Annex of Council Directive 91/628/EEC);
  - b. That an instrument for emergency slaughter is available on board (point 23 Chapter I.D of the Annex of Council Directive 91/628/EEC).

#### **ADDENDUM TO MISSION REPORT DG(SANCO)7544/2005**

In their comments on a draft version of this report, the CCA provided the following initial reaction to the recommendations.

In relation to 1b, a proposal to amend legislation will be submitted for Government assessment and approval and it is estimated that this should be published before the end of the year. In the meantime, the necessary corrections will be distributed through associations in the sector and the Regional Directorates and recommendation 5 (a) also considered in this context.

In relation to 2, a request has been made to the certification body of the Ministry of Agriculture to define, in collaboration with the CCA, the structure, content and number of hours for these courses. In the meantime, we will continue to encourage the various bodies, particularly production associations, to organise training courses.

In relation to 3, this was already discussed in a meeting of the CPSIPA and the CCA and the methodology agreed and measures in this area will be stepped up.

In relation to 4, theoretical and practical training for inspectors and work to standardise criteria and procedures work will continue subject to the availability of human and material resources.

In relation to 5b, an information leaflet will be produced and furthermore, before the end of this year it is planned to publish a handbook of best practice for pig farmers in which these issues will be addressed in more detail.

In relation to 6a, once the computer application is operational, checks will no longer be made with reference to 450cm<sup>2</sup>/bird/cage.

In relation to 6c, methods which respect the provisions of Directive 98/58/EC will be encouraged.

In relation to 7a, all the relevant companies and authorities have been informed about this matter. Although ships masters have reported needing to stow containers, under certain circumstances, so that the stability of the vessel is not compromised, official veterinarians have also been instructed to prevent this type of stowage and initiate infringement proceedings as appropriate.

In relation to 7b, all ships are now equipped with a captive bolt gun.