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HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL  
Directorate F - Food and Veterinary Office

DG(SANCO)/8522/2002 – MR Final

**FINAL REPORT OF A MISSION**  
**CARRIED OUT IN GREECE**  
**FROM 10 TO 14 JUNE 2002**  
**CONCERNING ANIMAL WELFARE ON PIG, CALF AND LAYING HEN**  
**HOLDINGS**

*Please note that factual errors in the draft report have been corrected in bold, italic type. Clarifications provided by the Greek Authorities are given as footnotes, in bold, italic type to the relevant part of the report.*



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## ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

CA	Competent Authority
CCA	Central Competent Authority
DG SANCO	Directorate General for Health and Consumer Protection ( <i>Santé et protection des Consommateurs</i> )
EEC	European Economic Community
EC	European Community
EU	European Union
FVO	Food and Veterinary Office
OV	Official Veterinarian
PVS	Prefectural Veterinary Service

## 1. INTRODUCTION

The mission took place in Greece from 10 to 14 June 2002. The mission team comprised three veterinary inspectors from the Food and Veterinary Office (FVO).

The mission was undertaken as part of the FVO's planned mission programme. The inspection team was accompanied during the whole mission by a representative of the Central Competent Authority (CCA) and/or Prefectural Veterinary Service (PVS).

At the opening meeting held on 10 June 2002, the objectives of the mission were confirmed by the inspection team and the role of the CCA in relation to animal welfare checks on farms was explained.

## 2. OBJECTIVES OF THE MISSION

The objective of the mission was to evaluate the system of animal welfare inspections on holdings with pigs, calves and laying hens. The current mission is the last in a series of missions to all Member States to evaluate control systems and operational standards regarding checks of animal welfare in these three livestock sectors.

In pursuit of this objective, the following sites were visited:

VISITS			Comments
Competent Authorities	Central	2	Opening and closing meetings
	Regional	2	Meetings were held with the responsible services in Thessaloniki and Imathia.
Pig holdings		2	During each visit, an inspection was carried out by a local inspector.
Calf holdings		1	
Holdings with laying hens		3	

## 3. LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation and in particular:

Article 9 of Council Directive 91/629/EEC<sup>1</sup> of 19 November 1991 laying down the minimum standards for the protection of calves.

Article 9 of Council Directive 91/630/EEC<sup>2</sup> of 19 November 1991 laying down minimum standards for the protection of pigs.

Article 7 of Council Directive 98/58/EC<sup>3</sup> of 20 July 1998 concerning the protection of animals kept for farming purposes.

Article 9 of Council Directive 88/166/EC<sup>4</sup> of 7 March 1988 laying down minimum standards for the protection of laying hens in battery cages.

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<sup>1</sup> OJL 340, 11.12.1991, p. 28;

<sup>2</sup> OJL 340, 11.12.1991, p. 33;

<sup>3</sup> OJL 221, 08.08.1998, p.23;

Commission Decision 98/139/EC<sup>5</sup> 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.

## **4. BACKGROUND TO THE CURRENT MISSION**

### **4.1 Previous missions**

A previous FVO mission to Greece DG(SANCO)/1133/2000 from 28 February to 10 March 2000, included visits to farms with laying hens. This report concluded that the supervision of farms was not effective. The full report of this mission is available at:

[http://europa.eu.int/comm/food/fs/inspections/vi/reports/greece/vi\\_rep\\_gree\\_1133-2000\\_en.pdf](http://europa.eu.int/comm/food/fs/inspections/vi/reports/greece/vi_rep_gree_1133-2000_en.pdf)

The recommendations made in this report to the CCA, which are relevant to the current mission are summarised as follows:

To ensure effective supervision of the implementation of 88/166/EEC.

To consider issuing clear guidelines or instructions in order to standardise checks.

### **4.2 Livestock sectors**

According to the official website of the CCA <http://www.minagric.gr>, there were 580,000 cattle, 1 million pigs and 28 million poultry in Greece in 2001. The CCA stated that in Greece, calves are not reared for the production of white veal meat. There were approximately twice as many holdings with pigs and calves and five times as many holdings with laying hens in Thessaloniki compared with Imathia, which was the other region visited during this mission.

## **5. MAIN FINDINGS**

### **5.1 Competent Authority**

The report of a mission on animal welfare during transport carried out from 20 to 24 November 2000 provides information on the structure of the Competent Authority. This report is available at:

[http://europa.eu.int/comm/food/fs/inspections/vi/reports/greece/vi\\_rep\\_gree\\_1060-2000\\_en.pdf](http://europa.eu.int/comm/food/fs/inspections/vi/reports/greece/vi_rep_gree_1060-2000_en.pdf)

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<sup>4</sup> OJL 074, 19.03.1988, p. 83;

<sup>5</sup> OJL 38, 12.02.1998, p. 10;

A summary of the functions of the different levels of the CA is provided in the following table:

Level	Functions relevant to this mission
Central	Transposing EU legislation into Greek legislation. Providing guidance, instructions and training to <i>Prefectural</i> Veterinary Services (PVS).  Compiling the information from PVS for transmission to the Commission every 2 years.
<i>Prefectural</i>	There are 54 PVS one in each region. The PVS are accountable to the Prefect and are paid from the budget of the regions, but act on technical instructions from central level.
Local	There are 250 operational local offices, here the official veterinarians are responsible for implementing checks of animal welfare on farm. They are under the supervision and co-ordination of the PVS.

There is currently one veterinarian responsible for animal welfare at the central level. In addition to animal welfare on farms, this official is also responsible for animal welfare during transport and at slaughter and for welfare of laboratory and pet animals.

In Imathia, there was one official working at the *prefectural* level on the implementation of these issues. There were five local offices in this region, each with one official veterinarian who was responsible for carrying out checks for public health, animal health and animal welfare in his/her area. There were seven milk processing plants and one high throughput slaughterhouse in this region. The official veterinarians at a local level worked on a weekly rotation at the slaughterhouse.

In Thessaloniki, there were reportedly 48 veterinarians working at the *prefectural* level, but it was unclear whether there was anyone specialising in animal welfare issues. There were 13 local offices in this region with between two and seven veterinarians working in each office.

During the mission, several OVs complained that the number of inspectors was insufficient to allow them to meet their workload.

## 5.2 Applicable legislation in Greece

The following table indicates the national Greek legislation which transposes the EU legislation relevant to this mission.

Council Directive	Greek legislation transposing EU requirements
91/629/EEC (as amended)	Presidential decree n°. 179/98
91/630/EEC	Presidential decree n°. 139/95
86/113/EEC <sup>6</sup>	Ministerial Decision n°. 361986/87
98/58/EC	Presidential decree n°. 374/2001

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<sup>6</sup> OJL 095, 10.04.1986, p. 45

A check of the legal transposition was not carried out. However, Council Directive 86/113/EEC on the protection of laying hens kept in battery cages was annulled by the judgement of the European Court of Justice in Case 131/86. Council Directive 88/166/EEC should have been subsequently transposed into Greek legislation. In addition, Council Directive 99/74/EC<sup>7</sup> on the protection of laying hens should have been transposed before 1.1.02. This has not been done yet and a representative of the CCA reported that the proposed Greek text was with the Superior Court, which was the final stage before publication.

Presidential decree n°. 374/2001 provides a legal basis for sanctions by referring to an earlier Law on the protection of animals 1197/81, which gives general provisions for animal welfare. Possible sanctions include either imprisonment or a fine of 10 to 30€.

### 5.3 System of supervision

#### 5.3.1 Previous inspections

The PVS, in both regions visited, had sent summaries of the results of previous inspections to the CCA, but these did not indicate that inspections had been carried out each year. Article 7 of Council Directives 91/629/EEC and 91/630/EEC requires a statistically representative sample of holdings to be inspected each year. The last report of checks from PVS of Thessaloniki to the CCA was in 1998. In Imathia, the PVS failed to make a report in 1998, but did so in 1999 and 2000. The most recent report from the CCA to the Commission on the results of inspections throughout the country was in 1999. This report indicated that deficiencies had been detected on 10.7% of 2636 calf holdings inspected and 22.7% of pig holdings. As the CCA is required to provide a report to the Commission every two years, the report for 2001 is overdue.

Veterinary service policy has been to carry out checks at the same time as checks for other purposes and to provide advice when deficiencies were detected. There were no written reports of the actual inspections in the *prefectural* or local offices in either Thessaloniki or Imathia. The procedures for imposing sanctions had not been used in either of the two regions.

#### 5.3.2 Current system of training and inspection

On 28 March 2002, the CCA issued standard checklists for carrying out checks and on 9 April 2002 provided guidance on the system of reporting. The CCA also gave guidance during training seminars organised for *prefectural* and local services, which take place every 2 months. The most recent seminar in April 2002 had been attended by two veterinarians working at the *prefectural* level in Thessaloniki and by veterinarians working at the local level in Imathia. The objective of the CCA is to train all the veterinary inspectors in stages. In both the regions visited those who had attended the seminar had provided a briefing for their colleagues on their return.

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<sup>7</sup> OJL 203, 3.08.1999, p. 53;

## 5.4 Farms visited during the mission

All farms were selected by the competent authority. During the farm visits, an official from the local services carried out an inspection. All of the OVs had carried out a previous inspection of the farms visited. In most cases, the OVs had used the standard checklist issued by the CCA when carrying out the previous check.

### 5.4.1 Pig holdings visited

One holding with 200 sows, 17 boars and their offspring was visited in Thessaloniki and a second holding with 500 sows was visited in Imathia. Following an inspection of the farm in Thessaloniki, several weeks before the mission, the OV had recommended:

- (1) the creation of hospital pens,
- (2) mortality and medical records to be kept,
- (3) the installation of an alarm to indicate failure of the ventilation system and
- (4) a back-up system in the event of such a failure.

The records and the alarm were in place at the time of the mission visit and the farmer reported that he was in the process of addressing the other two issues.

On the farm visited in Imathia, the OV had indicated the most serious deficiencies regarding the state of repair of some of the pens during previous visits but had not established a plan for rectifying this situation. The lack of an alarm had also been identified by the OV but no clear deadline had been established for its installation.

The following table indicates the criteria checked by the OV during the visits in Thessaloniki (TK) and Imathia (IT). The level of performance of the check is also indicated. Areas which were either not sufficiently checked or which were not the subject of sufficient action by the OV are indicated.

Evaluation of checks on pig holdings			
Criteria	Level of check <sup>8</sup>		Comments
	TK	IT	
Daily inspection of livestock by farmer <sup>9</sup>	NC	NC	
Space allowance	+	+	There was systematic overstocking in 25% of pens with finishing pigs on one farm and the OV indicated that this problem must be rectified the same day.
Weaning age	+	+	
Floors and fixtures	+	+	Although both OVs identified problems with the poor state of repair of several buildings, the action taken varied. In one case, the OV asked that pigs be removed from the worst pen the same day, whereas on the other premises no clear deadline was established by the OV for the necessary repairs.
Environmental enrichment	IC	IC	Apart from some chains fitted to some of the pens, there was a lack of materials to satisfy the behavioural needs of pigs on both farms and the issue was raised by the OVs. It was, however, not clear what action the farmer should take to remedy this deficiency.
Mutilations	IC	IC	Questions were asked in relation to mutilations, but a justification for carrying out tail-docking was not sought.
Access to feed	+	+	
Feed quality	+	+	
Access to water	+	+	
Light	+	+	

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<sup>8</sup> + = Checked, IC = Inconsistently Checked, NC = Not Checked.

<sup>9</sup> *In their response to the draft report the Greek authorities noted that the checklists used by their inspectors included the criterion “inspection frequency of farm animals”.*

Evaluation of checks on pig holdings			
Criteria	Level of check <sup>8</sup>		Comments
	TK	IT	
Air quality	+	+	The OV expressed reservations about the high environmental temperature in one newly built house for finishers. This was ventilated by natural ventilation only.
Back-up systems	+	+	Back-up system in event of failure of ventilation still not in place following recommendation of OV during earlier inspection.
Alarm system	+	+	Present on one farm and lacking on the other with no deadline established for its installation.
Care for sick or injured animals	IC	IC	On both farms pens had been designated for sick or injured pigs. These pens, however, had the same features as the remainder of the pens in the building and lacked any form of bedding, as required by point 4 of the Annex of Council Directive 98/58/EC. On one farm, following an earlier inspection, the OV had requested that proper hospital pens be created. None had yet been created. Several pigs which were not in optimal health had been accommodated together in an overcrowded pen. On the second farm more generous space allowances had been provided for this category of pig, but the OV had not required a more comfortable lying area for injured animals.
Medicine records	+	+	On one farm, these records had been kept since requested to do so by the OV at a previous inspection several weeks earlier.
Mortality records	+	+	
Euthanasia	IC	+	There was a wide variation between the 2 regions regarding killing animals on farm. On the farm in Thessaloniki, the OV mentioned that weak animals must receive greater care, but did not discuss appropriate methods for killing moribund piglets. On the second farm, in Imathia, a member of farm staff was permitted to kill injured animals on farm.

On both pig farms, the farmers had not been aware of the legal requirements prior to an inspection of their farm several weeks before this mission. On

one farm the mission team had to remind the inspector to check the premises with dry sows and boars.

#### 5.4.2 Holdings with calves visited

The following table indicates the criteria checked by the OV during the inspection of calves on a dairy holding in Thessaloniki. It is also indicated whether the criteria were checked in a satisfactory manner. Areas which were either not sufficiently checked or which were not the subject of sufficient action by the OV are indicated.

Evaluation of checks on calf holdings		
Criteria	Level of check <sup>10</sup>	Comments
Daily inspection of livestock by farmer	+	
Space/ social contact	+	OV was not clear what transitional periods were available for the renovation of older accommodation.
Tethering	+	Calves were tethered for the first 60 days. OV clearly pointed out that immediately following this inspection calves must not be tethered. Farm manager stated that prior to an inspection some weeks earlier he had not been aware of this or other legal requirements relating to calves.
Floors and bedding	+	Calves less than 2 weeks of age were accommodated in wooden crates without bedding. OV indicated that bedding must be supplied.
Cleaning and disinfection	+	
Feed quality	+	Home mixture of ground maize, soya and wheat bran fed to calves during first 60 days. OV unsure if this met the legal requirement for fibrous food.
Access to water	+	
Air quality	+	
Back-up system	+	
Alarm system	+	
Care for sick or injured animals	+	
Medicine records	+	
Mortality records	NC	

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<sup>10</sup> + = Checked, IC = Inconsistently Checked, NC = Not Checked.

### 5.4.3 Holdings with laying hens visited

There were approximately 9000 birds in each of the holdings visited. The following table indicates the criteria checked by the OV during the visits in Thessaloniki (TK) and Imathia (IT). The level of performance of the check is also indicated. Areas which were either not sufficiently checked or which were not the subject of sufficient action by the OV are indicated.

Evaluation of inspections of holdings with laying hens in battery cages.			
Criteria	Level of check <sup>11</sup>		Comments
	TK	IT	
Daily inspection of livestock by farmer	+	+	
Space allowance	+	+	25% overstocking on the second farm visited. OV stated that this had to be corrected the same day.
Floors	NC	NC	Neither OV had a method for measuring the slope of the floor.
Access to feed	IC	+	Overstocked cages on one farm did not provide sufficient trough space. On second farm, 7.5% of cages did not fulfil this requirement. Here the OV did not indicate that this did not meet the requirements of current legislation and instead emphasised that the cages would not meet the space requirements applicable from 1.1.2003.
Access to water	+	+	
Light	+	+	On one farm, the length of the dark period was 7 hours and the OV commented that this should not be less than 8 hours.
Air quality and temperature	+	+	The temperature on one holding was 30°C. OV indicated that this was at the upper limit acceptable. However, in the opinion of the mission team this was too hot.
Back-up ventilation system	+	+	
Alarm system	+	+	The OV identified the lack of alarm on one holding, but did not lay down a deadline for rectifying this deficiency.
Facility for isolation or treatment	NC	IC	One OV did not raise this subject the second OV did not verify the answer given by the farmer.

<sup>11</sup> + = Checked, IC = Inconsistently Checked, NC = Not Checked

Evaluation of inspections of holdings with laying hens in battery cages.			
Medicine records	+	NC	OV did not verify that records existed when the farmer indicated this.
Mortality records	+	NC	OV did not verify that records existed when the farmer indicated this.
Euthanasia	IC	NC	On one farm the owner stated that birds were always found dead.

In addition to the two farms with laying hens in conventional cages, an inspection was also carried out on birds in an alternative system. Here the birds had a littered area, an area of slatted floor and a nesting area. The OV carried out a methodical inspection of the facilities and noted that no perches were available for the birds. He also remarked that 21% was a high mortality rate for the current batch of birds (previously a mortality rate of 13 and 14% had occurred) and attributed this to the lack of beak trimming. The mission team suggested that the lack of perches for the birds, which would have provided aerial security, may also have contributed to the level of cannibalism and the high mortality rate.

## 6. CONCLUSIONS

### 6.1 Applicable legislation in Greece

Council Directive 99/74/EC has not yet been transposed into Greek legislation, which is already six months late. The other relevant Directives have been transposed into corresponding Greek legislation. Although Greek Presidential Decree transposing Council Directive 98/58/EC is now in force, this was also transposed more than one year after the deadline laid down in this Directive.

The sanctions, which can be imposed on persons who fail to respect the legal requirements, are not proportional to the many of the commonly occurring offences.

### 6.2 Competent Authority

Taking into account their other responsibilities, one official at the central level is insufficient to deal with issues relating to animal welfare on farms. At *prefectural* and local level there are insufficient resources to ensure that an adequate number of inspections are performed each year of the quality carried out during the mission.

### 6.3 System of supervision

There is a major difference in the system of checks of animal welfare on farm before and after March 2002. The previous policy whereby the CA gave advice on animal welfare issues while carrying out other checks and without any clear method for doing so was an ineffective system of surveillance. Farmers were unaware of their legal requirements due to the lack of information given. The system of checks introduced since March 2002 ensures that the majority of criteria are checked and during the inspections seen, suitable advice was generally given.

Before March 2002, reports from Greece to the Commission to fulfil the requirements of Article 7 of Council Directives 91/629/EEC and 91/630/EEC were based on unreliable and incomplete information. In addition, a system to fulfil the reporting requirements of Commission Decision 2000/50/EC was not in place to meet the deadline of 31.4.02. The procedures adopted since March 2002 will enable the CCA to have access to more reliable information on animal welfare on farms through a better system of reporting.

During the inspections seen, the OV's carried out methodical inspections and detected the major deficiencies present. The inspections followed the method described in the recent CCA instructions and in most cases, clear instructions were given to the farmer to rectify the problems detected. However, the following areas were not adequately addressed:

#### *6.3.1 Inspections of pig holdings*

There was a lack of emphasis on the care of sick or injured pigs (Point 4 of the Annex of Council Directive 98/58/EC), killing of animals on farm (Article 12 of Council Directive 93/119/EC), environmental enrichment for pigs (point 16 of chapter I of Council Directive 91/630/EEC) and justification for tail-docking, which was accepted as a routine mutilation (point 4 of part III of chapter II of Council Directive 91/630/EEC). The design of the checklist used may not ensure that all categories of animals on a large intensive pig unit are checked.

#### *6.3.2 Inspections of holdings with calves*

The lack of a clear definition of "Fibrous food" in point 11 of the Annex of Council Directive 91/629/EEC gave problems with interpretation. The transitional periods to allow time to refurbishment of older buildings to comply with the latest space allowances gave rise to some confusion.

#### *6.3.3 Inspections of holdings with laying hens*

There was sometimes a lack of verification of the reply given by the farmer. There was no method for measuring the slope of cages.

### **6.4 Overall assessment of the competent authority**

The system in place before March 2002 was inadequate. The inspection and reporting regime introduced since March 2002 if adequately enforced, could provide a good system of surveillance of animal welfare on farm. Continued efforts with training and implementation will be required to ensure that this level of inspection is maintained and becomes established throughout the country. The number of personnel involved at a central level is inadequate, and it could be difficult for the *prefectural* and local services, with current resources, to sustain the level of inspection seen during the mission.

## **7. CLOSING MEETING**

A closing meeting was held on 14 June 2002 with representatives from the central competent authority, The Greek Ministry of Agriculture. At this meeting, the main findings of the mission were presented by the inspection team. The representatives of the central competent authority indicated that major efforts were being made to improve the performance of the authorities at all levels through recruitment and training.

## **8. RECOMMENDATIONS**

### **8.1 To the competent authorities in Greece**

The competent authorities are requested to inform the Commission Services of the actions taken and planned to address the following recommendations and to provide a timetable for the completion of these actions. This should be done within one month of the receipt of the final mission report.

1. To transpose Council Directive 99/74/EC into Greek legislation.
2. To ensure that the level of sanctions applicable for the commonly occurring deficiencies of the relevant EU legislation is proportionate to the offence.
3. To ensure that adequate resources are in place at all levels for effective inspections of a statistically representative sample of holdings each year (Article 7 of Council Directives 91/629/EEC and 91/630/EEC).
4. To continue to ensure that training of official veterinarians includes the inspection of animal welfare on farm. The requirements not adequately checked during the inspections seen during this mission should be emphasised.
5. To ensure that the reporting requirements of Commission Decision 2000/50/EC are met.

## **9. ADDENDUM TO MISSION REPORT DG (SANCO)/8522/2002**

### **Competent Authority response to the recommendations in the report**

In relation to the recommendations, the Central Competent Authority indicated:

1. Legislation transposing Council Directive 99/74/EC will be published during the first half of 2003.
2. Amendments to legislation are being proposed so that the level of applicable sanctions is proportionate to the offence.
3. CCA have requested administrations in the Prefectures to send them proposals on how they intend to meet this recommendation.
4. Training of veterinarians will continue in this field with courses scheduled for October and November 2002.
5. Commission Decision 2000/50/EC has been incorporated into national law and also the specifications have been included in the standard checklists used for carrying out inspections.