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Comments to draft report Sante F audit 2017-6123

I hereby send you the Danish Veterinary and Food Administrations (DVFA) and the Danish Agricultural Agency (DAA) comments on the draft report and the translated draft report from Sante F audit 2017-6123, to evaluate Member State activities to prevent tail-biting and avoid routine tail-docking of pigs.

Comments

In the whole report (English version) please change SEGES to Pig Research Centre (PRC) as this is the correct English name.

Executive summary

Second paragraph, second and third line:

The DVFA suggests that "better compliance with the provisions of the directive with regard to the avoidance of routine tail-docking in pigs" is replaced by "a reduction in the number of tail-docked pigs". The justification for this amendment is that the objective of the action plan on better pig welfare is to reduce the number of tail-docked pigs. Furthermore, it is the opinion of the DVFA that in general routine tail-docking is not carried out. The provision in Directive 2008/120/EC has from a legal point of view so to say two "legs". The first states that tail-docking can be carried out only where there is evidence that injuries to pig's tails have occurred. When the farmer can give this evidence/documentation, tail-docking can be carried out, and this can't be regarded as routine tail-docking. This is typically the case in a control situation, also when the issue of export of weaner pigs is taken into account. If the farmer can't give evidence/documentation that injuries to tails have occurred, a sanction will be given, and this was the case for one herd in 2017. The second "leg" requires that measures have been taken to prevent tail-biting. If it during a welfare control in a pig herd is assessed that the measures taken by the farmer are not sufficient, e.g. insufficient access to suitable enrichment material, sanctions will be given.

Fourth paragraph, last line:

The DVFA suggests that "fattening farms" is replaced by "herds with slaughter pigs" to be in accordance with current Danish terminology, according to which "fattening pigs" are now called "slaughter pigs". Furthermore, "herds" instead of "farms", cf. the comment to the first paragraph in chapter 4 Background. This comment applies *every time "fattening farm(s)" occur in the document.*

Fifth paragraph, first line:

The DVFA suggests that "piglets" is replaced by "weaner pigs", as it is weaner pigs that are exported.

Last paragraph, first line:

In accordance with the comment to the second paragraph above the DVFA suggests that the word "routine" is deleted.

Last paragraph, third line:

The DVFA suggests that the following "or another type of" is inserted after "more". It may not only be a question of quantity of enrichment material, but also of the type of enrichment material. The same comment applies to the *third line of the last paragraph in chapter 6 Overall Conclusions*.

Last paragraph, fourth line:

The DVFA suggests that "piglets" is replaced by "weaner pigs", cf. the comment above.

4 Background

First paragraph, first line:

The number (3300) of farms (in Danish "bedrifter") mentioned here, is the number given by Statistics Denmark. This reflects an economic entity /business, and may include a number of herds (in Danish "besætninger") on different locations. As it is herds that are selected for animal welfare controls, the number (8675) given in finding no. 41 is larger. To be consistent with this the DVFA therefore suggests that "farm(s)" is replaced by "herd(s)" and that "on farm" is replaced by "in the herd" in the rest of the document, including the recommendations and the annex. The DVFA also suggests that this is explained in a footnote.

Second last paragraph, last line:

No footnote 5 has been inserted.

5 Findings and Conclusion

5.1 Implementing Measures

Finding no. 2, third and fourth line:

The DVFA suggests that "Order no. 1462 of 7th December 2015" is replaced by "Order no. 1324 of 29th November 2017, as the order has been amended. The amendment doesn't affect the part about tail-docking.

Finding no. 4, last line:

The DVFA suggests that "the animal welfare Act no. 50 of 11th January 2017" is replaced by "Order no. 20 of 11th January 2018, which codifies the animal welfare Act". The animal welfare Act has been amended to include a legal basis for the minister to issue legislation on education.

Finding no. 5, second line:

According the Country Profile (page 28) enforcement notices include both injunctions (indskaerpelse) and prohibitions (paabud/forbud). The most common sanctions are injunctions, but also a few prohibitions are given. Therefore the DVFA sug-

gests that "enforcement notices (indskaerpelse)" is replaced by "enforcement notices (injunctions (indskaerpelse) or prohibitions (paabud/forbud))".

Finding no. 6, first line:

The DVFA suggests that "routine tail-docking" is replaced by "number of tail-docked" as the national strategy is a part of the action plan for better pig welfare, cf. the comment to the second paragraph in the Executive Summary.

Finding no. 8, second line:

The DVFA suggests that "the organisation groups" is replaced by "DOSO (the organisation ... groups", as DOSO is the most commonly used in Denmark.

Finding no. 8, fifth and sixth line:

The DVFA suggests that "Meat products" is replaced by "Meat", as meat products could first be labeled by December 2017.

Finding no. 8, last line:

The DVFA suggests that "the lowest (one heart) level has already achieved a share of 25 % of the national marked" is replaced by "labelled meat has already achieved a share of 25 % of the national marked, with the largest increase in meat from the lowest (one heart) level", as this will better reflect the actual situation.

Finding 11, third line:

The DVFA suggests that "harmonise the implementation" is replaced by "exchange experience and as far as possible harmonise enforcement" as this would better describe the objectives of the group.

Finding no 12, first paragraph, last line:

The DVFA suggests that the words "or other consultant" is inserted after "veterinarians", as there may be a need to consult others, e.g. in case of ventilation problems. The same comment applies to *conclusion no. 30*.

Finding no. 13, third line:

The Association of Danish Pig Producers has joined the group; the DVFA therefore suggests that this association is mentioned.

Finding no. 13, last line:

The DVFA suggests that practicing veterinarians are mentioned together with farmers, as it is the intention that the information campaign should also target them.

Finding no. 18, third line:

The DVFA suggests that "the one heart level of" is inserted after "in", as this would reflect the current situation.

Finding no. 20, first line:

The DVFA suggests that "SEGES research institute and" is deleted, as the Pig Research Centre did not participate in this study.

Findings no. 25, last sentence :

The DVFA suggests that "(VETREC)" is substituted with "VetReg", as this is the correct name.

Conclusion 30, last line:

The DVFA suggests that "routine" is deleted; cf. the comment to the second paragraph of the Executive Summary.

Conclusion 32, first line:

The DVFA suggests that "piglets" should be replaced by "weaner pigs".

5.2 Economic factors

Finding number 33:

The DAA suggest to delete "50% of funding is from the EU Rural Development Programme." as the Green Development programme is a purely nationally funded programme and is not part of the Danish Rural Development Programme.

Conclusion 35:

Please note that neither the Danish Agricultural Agency nor the Danish Environmental Agency, provide EU funding to promote pig welfare within the scope of the audit. The conclusion should be modified accordingly.

Conclusion no. 36, first line:

The DVFA suggests that "routine" is deleted; cf. the comment to the second paragraph of the Executive Summary.

5.3 Official controls

Finding no. 39, third line:

It is the opinion of the DVFA that the guideline on animal welfare controls in pig herds gives sufficient guidance on mixing of pigs in chapter 5.3.10. Examples are given on possible measures to prevent fighting, including on how pigs should be given a possibility to escape and hide from other pigs. The DVFA therefore suggests that no. 5 is deleted.

Finding no. 41, second last line:

The DVFA suggests that for clarity of the text "number of inspections carried out by" is inserted in front of "the Region/unit", which should be replaced by "Veterinary Inspection Unit".

Finding no. 46, last line:

The DVFA suggests that "breeding farms" is replaced by "Sow herds" both to avoid confusion with the "real" breeding herds (zootechnical), and cf. the comment to the first paragraph of chapter 4 Background. The same comment applies to *the third line of recommendation no. 3.*

Finding no. 47, fifth line:

The DVFA suggests that "health" is deleted, it is a superfluous word.

Finding no. 48, first and third line:

In order to specify who send the data, the DVFA suggests that "by the business operator" is inserted in front of "sent".

Conclusion no. 51, third line:

The DVFA suggests that "routine" is deleted, cf. the comment to the second paragraph of the Executive Summary.

6 Overall Conclusion

First paragraph, second and third line:

The DVFA suggests that "better compliance with the provisions of the directive with regard to the avoidance of routine tail-docking in pigs" is replaced by "a reduction in the number of tail-docked pigs.", cf. the comment to the second paragraph of the Executive Summary.

Fifth paragraph first line:

The DVFA suggests that "piglets" is replaced by "weaner pigs".

Last paragraph, first, second and fourth line:

In the *first line* the DVFA suggests that "routine" is deleted, cf. the comment to the second paragraph of the Executive Summary. In the *second line* that "fattened" is replaced by "reared" to be in accordance with current terminology, and in the *fourth line* that "piglets" is replaced by "weaner pigs".

7 Closing Meeting

Last line:

The DVFA suggests that "new working groups" is replaced by "a new working group", as only the group mentioned in finding no. 13 is new.

8 Recommendations

Recommendation no. 2, third line and recommendation no 5, eighth line:

The DVFA suggests that "routine" is deleted. This suggestion is made both with a reference to the comment to the second paragraph of the Executive Summary, and as one of the objectives of the action plan for better pig welfare is to reduce the number of tail-docked pigs as such.

ANNEX 2, In the column on Danish national legislation

Re. no. 1:

The DVFA suggests that "Act 4, 9) is replaced by "(Act 49,9) to give the correct reference.

Re. no. 2:

The DVFA suggests that "323, 12-2)" is deleted, as this order has been repealed, and that "(Act 56, 1)" is replaced by "(Act 56, 3,1)" to give the correct reference.

Re. no. 3:

The DVFA suggests that "(Act 104,4)" is replaced by "(Act 56, 4)" to give the correct reference, that "'misting" is replaced by "sprinkling" as the same word should be used for the same device, and that "(Act 56, 8)" should be replaced by "(Act 49, 8)" to give the correct reference.

Re. no. 6:

The DVFA suggests that "risk" is inserted after "possible".

ANNEX 2, in the column on compliance criteria

Re. no. 3: It is a misunderstanding that the Veterinary Inspection Units do not avail of a device to measure ammonia. This may be caused by the fact that inspectors does not use this as a routine during inspections, but assess the air quality on a sensory basis and by looking at the pigs. A measurement can, however, be used to support a sanction in case of inadequate air quality. The DVFA therefore suggest that "The CA does not avail of a device to measure ammonia levels" is replaced by "The CA does not as a routine measure ammonia levels".

Re. no. 4:

The DVFA suggests that the sentence "Inspectors use a table to assist in calculation of available space" is deleted. The DVFA is not aware of any table, maybe there is some confusion with the table used in connection with transport.

Below are in Danish the DVFA comments to the translated report:

All comments to the English version of the draft should be reflected in the Danish version. Furthermore the DVFA has the following comments:

I hele rapporten skal "SEGES" ændres til "SEGES Svineproduktion", da det er det korrekte navn.

2 Formål og anvendelsesområde

Skemaet

I skemaet under bemærkninger ændres "private aktører" til "praktiserende dyrlæger".

4 Baggrund

Første afsnit, første linje:

På dette sted er det korrekt at oversætte "farms" til bedrifter, øvrige steder oversættes "farm(s)" og "herd(s)" til besætninger, jf. bemærkningen til det engelske udkast.

Første afsnit, anden og tredje linje:

FVST foreslår, at "fravænnede grise" ændres til "smågrise", da det er en mere korrekt betegnelse for grise på ca. 30 kg.

Andet afsnit, anden og tredje linje:

FVST foreslår, at "holdningspapir" ændres til "positionsPapir", da det er den terminologi, der anvendes om det papir. Dette gælder også for resultat nr. 6.

5 Resultater og konklusioner

Resultat nr. 3, anden linje:

FVST foreslår, at oversættelsen af "flooring" ændres fra "gulvbelægning" til "gulvtype", da der henvises til fast eller drænet gulv.

Resultat nr. 5, 1. linje:

FVST foreslår, at "indskærpelse" ændres til "indskærpelse og påbud/forbud", da der ikke umiddelbart findes et dansk ord for "enforcement notices".

Resultat nr. 7, tredje linje:

FVST foreslår, at "rearing pigs" oversættes til "avls- og slagtesvin" i stedet for "avls-/fedesvin".

Resultat nr. 9, fjerde linje:

FVST foreslår, at "opfølgingsgruppen" ændres til "følgegruppen", da det er den danske betegnelse for denne gruppe.

Resultat nr. 12, andet afsnit, tredje linje:

FVST foreslår, at "chockstrøm" ændres til "vagabonderende strøm", der er den danske betegnelse for dette fænomen.

Resultat nr. 26, femte linje:

FVST foreslår, at "en privat dyrlæge" ændres til "den praktiserende dyrlæge".

Resultat nr. 27, overskriften samt første og tredje linje:

FVST foreslår, at "Landbrugsrådgivningen", "Landbrugets Rådgivningscenter" og "Rådgivningscentret" ændres til "DLBR", der er den nutidige betegnelse.

Resultat nr. 40, første linje:

FVST foreslår, at "Landbrug & Fødevarers" ændres til "Fødevarestyrelsens", jf. den engelske tekst.

Resultat nr. 42, sidste linje:

FVST foreslår, at "rodemateriale" ændres til "beskæftigelses- og rodemateriale" da sanktionerne kan omfatte en af delene eller begge.

Resultat nr. 43, anden og tredje linje:

For at gøre teksten mere klar, foreslår FVST, at "Disse blev anset for at være i overensstemmelse" ændres til "Disse forhold blev anset for at være rettet".

Resultat nr. 47, næstsidste linje:

FVST foreslår, at "til" ændres til "fra", jf. den engelske tekst.

Resultat nr. 48, næstsidste linje:

FVST foreslår, at "får også fremlagt de gennemsnitlige karakterer" ændres til "har også adgang til de gennemsnitlige fund", da det er dette, der er tale om.

8 Henstillinger

Henstilling nr. 4, første og anden linje:

FVST foreslår, at "private dyrlæger" ændres til "praktiserende dyrlæger".

BILAG 2

Kolonnen med overholdelseskriterier, nr. 1:

FVST foreslår, at "skal være manipulerbart" ændres til "kunne fungere som rodemateriale".

Kolonnen med overholdelseskriterier, nr. 2:

FVST foreslår, at "gylle" ændres til "gødning" da det er den danske oversættelse af "manure".

Kolonnen med overholdelseskriterier, nr. 3, næstsidste linje:

FVST foreslår, at "står" ændres til "ligger", da ligger er indeholdt i det engelske ord "huddle".

Kolonnen med overholdelseskriterier, nr. 11, første linje:

FVST foreslår, at der indsættes et "ikke" efter "indeholder" for at bringe den danske tekst i overensstemmelse med den engelske.

Please let me know if you have any questions or need further information.

Yours sincerely



Per S Henriksen
Chief Veterinary Officer