

Meeting of the sub-group on the welfare of pigs

Sixth meeting, 17 October 2022
(Videoconference)

– MINUTES –

Attendance

Independent expert	Anna Valros Anne-Claire Berensten
Civil society organisations	CIWF
Business and professional organisations	COGECA FVE UECBV
Member States	Denmark Germany Italy Sweden
European Commission	DG SANTE G3
Guest	European Reference Centre for the Welfare of pigs External contractor for IA study on kept animals

Discussions on *animal welfare indicators*

1. Context by the Commission

The Commission presented the context of the discussion on animal welfare indicators (ABIs) explaining in particular, the relevant parts of the Inception Impact Assessment (problems to be addressed and different options).

2. Presentation by Italy

Italy presented the different types of indicators, relevant characteristics (sensitivity/specificity/feasibility) and their various uses, namely i) assessment of welfare ii) compliance/enforcement of legislation iii) improvement of farm practices through feedback to farmers iv) collection of macro level data and v) policy support. Italy elaborated on the general challenges associated with the use of indicators: i) lack of understanding by farmers/vets ii) evaluation of indicators is costly as it is time consuming iii) possibility of conflict of interest (when farm vet interprets the ABIs) iv) non-uniformity of ABIs between farms and animals v) uncertainty on whether they reflect the real animal welfare status vi) difficulty to find the most effective indicator to demonstrate the situation of an animal.

The Italian experience involves the introduction of ABIs in the national action plan to prevent tail docking, requesting that farm veterinarians fill in checklists that contain 10 indicators for fattening pigs, 9 for sows and gilts and 13 for weaners. In parallel, Italy introduced ABIs for official vets, using 5 indicators for all the above categories of pigs. The use of indicators is not mandatory but the official veterinarian may use them to confirm suspicion of non-compliance. Both channels (through farm and through official vets) use the same scoring

system with three scoring levels (insufficient, approved - legislation level, optimal - beyond legislation) and thresholds. To familiarize farm and official vets with ABIs, Italy produced national guidelines. The number of indicators for farm vets is higher, in order to better illustrate the situation.

In addition, Italy has put in place the Classyfarm system, which evaluates all the farms in its territory based on different areas, among which, animal welfare. The system can provide both overview data and data at farm level.

3. Discussion on Italy's experience

Members posed questions to Italy that clarified several issues as shown below:

On thresholds, Italy informed that the thresholds of 'insufficient' level of animal welfare are based on parameters included in the legislation and not in the guidelines. Therefore, the checklist to be completed by farm vets is based on legislation.

The thresholds were taken from the welfare Quality project and slightly adapted by the Italian Reference Centre, to be simpler and understandable by all parties involved.

Regarding the thresholds for tail lesions included in the checklist of farm vets, there is a slightly higher threshold for farms that keep undocked pigs.

As regards the role of the farm veterinarian, Italy explained that he/she signs a declaration that what happens in the farm is recorded professionally and is done in accordance with legislation and ethics. The checklist for farm vet has proven very useful as a guide to check the farm. If a farm is found insufficient as regards animal welfare, the farm vet must declare the truth, photograph the situation and load the info in the national database. He/she has to show the indicators to the farmer and the farmer has to verify the critical factors in order to prevent tail biting.

Another member shared its own experience, explaining that if the farm vet finds out the farm is not complying with the law, he/she first gives some time to the farmer to take corrective actions (e.g. 2 days). If the situation does not improve, the farm vet registers the checklist in the database. In general, farm vets work together with the farmers as well as with the officials. In the few cases when the farmer is reluctant to comply, the farm vet informs the official vet and guides him/her by giving information regarding the situation on the farm.

A member pointed out the risk of the farm vet being fired by the farmer, if the farm vet reports bad welfare on the farm. Private vets in Italy play a purely advisory role, having no possibility to sell veterinary medicines and therefore, they build a good collaboration to achieve good results, even beyond the legislation. There are few private vets that do not wish to join the system. However, the farmer cannot escape solving the problem, as an official vet will eventually inspect the farm.

Another member is of the opinion that farm vets are hired to improve the farm situation and not to control the farmers and therefore, in the occasion of reporting to the authorities, the farm vet would be replaced.

The role of official vet is to verify everything in the database before he/she visits the farm, i.e. the actions of the farm vet and the improvement measures the farmer puts in place. The guidance of the farm vet is very useful as it is him/her who knows well the farm and its situation, which is not static but evolving. Official vet might use documentation if he/she sees major discrepancies.

On the comparison of data provided by farm and official vets, Italy replied that the evaluations are similar. Usually, the overall score of a farm is not more than 1-2% different between the reports of farm and official vets. It is important to have both vets working on welfare.

On the progress observed towards an 'optimal' level of animal welfare at farm, Italy responded that the Covid crisis slowed down the process and currently, the welfare level is recorded as intermediate. Italy reflects on adopting a more intensive inspection program in order to compensate for the delay.

Another member shared own experience saying that at the beginning of the process, many farms did not comply with the law. Nowadays, although the collective data may not show improvement, there are many more individual farms growing pigs with intact tails.

On the procedure followed to phase out tail docking, Italy specified that farmers have to conduct a risk assessment, put in place the appropriate measures and subsequently, make trials to raise pigs with intact tails. In case they find this is not possible, farmers have to communicate their inability to the official vets, in order to be granted a derogation to raise docked pigs. There is no limitation regarding the time allowed for repetitive trials to raise intact pigs, or any other time frame. However, Italy estimates that the derogation will not be in place permanently. On the time the farmer should be given to apply measures that allow for raising intact pigs, a member replied it is difficult to set a fixed time, depending on the nature of corrective measures, i.e. refurbishment of the building is time consuming, while management measures can be put in place easier.

On the minimum frequency of checks by the farm veterinarian, Italy clarified that when the controls started (2018) there was a requirement of one evaluation per year, after which a time schedule was fixed to improve the farm situation within six months or one year. Nowadays, the checklist is registered usually every three months to one year. However, the completion of the check list is a decision of the farm vet that may register it whenever deemed appropriate, even once a month, not only for negative but also for positive developments. Farm vets have a contract with farmers for a fixed fee and this work is included in the services. They also complete checklists for biosecurity and antibiotic use. Farm vets usually visit the farms once or twice per week for reasons of animal health and production, therefore, it is easier to follow the situation. Today, also slaughterhouses require the farm evaluation.

As regards the frequency of checks by the official vet, Italy informed that an average farm gets inspected from an official vet once every 3-5 years, unless there is another reason to be inspected. The percentage of pigs with intact tails has to be high.

Regarding access to the Classyfarm system, farmers can see their results and the average provincial, regional and national score but not the results of other pig farms. The official vets have access to all information, regional vets at regional level and the central competent authority, at national level.

A member noticed that Italy has not required official vets to perform an evaluation of indicators related to the behaviour of animals, assuming that this is due to the time consuming nature of this type of evaluation (in contrast, other types of indicators can be easily assessed). Indeed, if someone enters a pigs' establishment, he/she gets all the attention of the animals and it takes time before animals start acting the way they would if nobody was present.

Concerning the indicators' performance, Italy has noticed that indicators do not always work, e.g. there have been farms with very dirty pigs but the environmental conditions were excellent and all pigs had intact tails. There are also farms not compliant with legal requirements but pigs can be healthy and free of injuries. Also, Italy has observed a diversity of indicators' measurements among farms of different geographical areas. Another member agreed that indicators can come out differently e.g. according to the number of pigs, climatic conditions etc.

4. Animal welfare indicators vs resource based indicators

A member suggested that there should be minimum requirements for living conditions of animals and animal based indicators should be used on top of this, to target more specific issues. Another member was of the opinion that welfare indicators are more important than requirements for living conditions, for example, it is more important if a pig is happy than if the pig lives in 1, 2 or 3 m² of space allowance.

5. Mandatory vs voluntary monitoring of Animal welfare indicators (ABMs)

The registration of tail biting is already a requirement in EU legislation. It was pointed out that if the new legislation requires the mandatory use of ABMs, it is important that farmers and the farm veterinarians can

see a good reasoning for that, namely an improvement of animal welfare and a higher level of productivity. Otherwise, there is a risk of monitoring becoming an unnecessary administrative burden, which could lead to poor data quality.

A similar situation can be expected for monitoring ABMs at slaughter. There has to be a financial benefit for the farmers and slaughterhouses to install a monitoring system, so that slaughterhouses or cooperatives decide to jointly invest in it.

6. Animal welfare indicators (ABMs) monitored at farm level

There is already monitoring of animal based indicators at farm level, in particular mortality. Farmers are interested to have the highest welfare possible, as this increases profitability. Farmers work together with their farm veterinarians to improve welfare.

Several members consider that animal based indicators should be **monitored at farm level**, given the **below advantages**:

- If the ABMs are measured at the farm, seeing progress in welfare might be more encouraging for the farmer rather than receiving infrequent visits by inspectors who check whether the legislation is complied with.
- Monitoring welfare at farm helps farmers to identify problems. Finland developed a farm application to score tail lesions on farm. Farmers gave a positive feedback saying that the application made them start to observe differently. The monitoring practice itself can improve welfare.
- It is essential to monitor every step of the production cycle. If a lesion is found in the slaughterhouse, it is not certain at which phase of the production it has occurred. Without knowing where the problem lies, one cannot remedy the issue and improve welfare. Reversely, it is possible to miss a welfare problem since the production cycle lasts for months i.e. pigs are slaughtered from around 5 months and in certain cases, up to 9 months of age. Therefore, lesions that have occurred earlier in the procedure, might pass unnoticed. Several members supported that to improve welfare on farm, the monitoring on farm is indispensable.
- Apart from welfare related reasons, there might also be other grounds to seek knowledge of the exact phase where a welfare problem occurs. In Finland, all pigs are undocked, therefore, any tail found damaged in the slaughterhouse is bitten. Building on this situation, Finland is planning to incentivise farmers towards good welfare by providing a subsidy based on the percentage of intact tails reaching the slaughterhouse. To do so, Finland needs to know exactly the point where any damage has taken place, otherwise farmers may be deprived from the subsidy without having any responsibility for the welfare problem. Fattening farms which finally take pigs to slaughter may bear the condemnations and abscesses, while having no responsibility for them. On the other hand, sow farms responsible for tail biting in the weaning unit are not incentivised to work towards addressing risk factors, since they do not bear any consequences of the problem.
- Current rules on fitness for transport of animals prevent the compromised animals to reach the slaughterhouse, therefore cases of bad welfare will never reach the slaughterhouse to come to light.
- Cull animals may also never reach the slaughterhouse, i.e. sows may be culled or die at farm, so they should be monitored more at farm level. In some cases, farmers may prefer to slaughter the animals at farm under emergency procedures rather than letting them die, as the on farm mortality should stay limited.
- Monitoring ABMs at farm gives the opportunity to act earlier than monitoring the ABMs at slaughter. As farm vets already know the situation at farm level, there is no reason to wait to gather data from the slaughterhouse. Moreover, the farmer and farm veterinarian are better motivated to monitor ABMs at farm level, as animals are going to live at the farm for a long period.

On the negative side, the monitoring of ABMs at farm level poses the **below challenges**:

- According to some members, monitoring indicators at farm is not appropriate for controlling compliance with legislation, either because it is complicated to show whether welfare rules are respected or because indicators may show differently in different farms or because resource based indicators are better suited for this purpose.

- The evaluation of behavioural ABMs requires that pigs calm down first and therefore it is time-consuming and costly.
- Although the farm vet is best positioned to make this evaluation, there are currently not enough vets to evaluate ABMs in all farms.
- Before applying such a monitoring, there must be knowledge on which are the best checking points for each ABM at farm level. For example, checking after mixing or mating may reveal more injuries. Also, farmers may choose a checking time when there is no incidence of ABMs, e.g. lameness.
- Harmonization of monitoring ABMs at farm level is more challenging than monitoring at slaughterhouse level, as different people give different interpretations.
- Although from an animal welfare point of view, monitoring ABMs at farm level is preferable, from a resource point of view, it is not possible that every animal is checked on the farm.

7. Animal welfare indicators (ABMs) monitored at slaughterhouses

In slaughterhouse, all pigs are inspected by the competent authority before going to human consumption. In general, data coming from slaughterhouses is targeting more the food safety and animal health area and not animal welfare.

Lesions found in animal carcasses are recorded. The farmers receive a report explaining all the findings/lesions and any revenue withheld due to the rejection of carcasses or parts thereof. Farmers may also receive detailed information like the number of pigs with short tail length and tail lesions, lung lesions and infected joints (Sweden). Farmers appreciate getting informed about carcass quality as it affects their profitability.

It is foreseen already in EU legislation that the official vet checks animal welfare at the slaughterhouse (Official Controls Regulation, art.1.2.f, 21.1 and 17.c and d (iii)) and communicates to the farm vet the results regarding animal welfare issues found at slaughter (Commission Implementing Regulation (EU)2019/627, art.39).

The existing system of monitoring pig carcasses in slaughterhouses may have room for improvement, provided that specific indicators are selected to target animal welfare.

Several members consider that animal based indicators should be **monitored at slaughter**, given the **below advantages**:

- It is possible to monitor ABMs on each individual animal, which is hardly possible to do at farm level.
- Less people are needed to do the scoring at the slaughterhouse than inspectors going at farm, which would be extremely difficult to harmonise.
- Advanced technology is available nowadays, providing automatically trained systems to identify problems equally to what an assessor can see by eye. Automation makes the monitoring consistent over time.
- Automated monitoring at slaughter is quick and easier to use, increasing the frequency of monitoring to routine level. Every time a batch of pigs is delivered for slaughter, one can monitor changes in the output as a result of the actions the farmer has taken.
- The degree of sensitivity that can be achieved by monitoring at slaughterhouse is much greater than incidental checks on the farm or few eye checks in the slaughterhouse by an inspector. Automation guarantees the same way of looking all the batches delivered all over the year which is completely different from what a human observer can ever achieve.
- The monitoring of progress of a farm is easy especially if a farmer supplies his/her pigs to the same slaughterhouse all the time. Progress or lack of progress on that individual farm is recorded by comparison of the latest with previous findings in the slaughter house.
- Monitoring ABMs at slaughterhouse level can be more easily standardised and harmonised compared to monitoring at farm level by individual people. Farm conditions may be even more diverse than slaughterhouse conditions.

- ABMs measured at slaughterhouses represent the most reliable and harmonised way for benchmarking purposes and legislation or other official schemes, as they allow setting thresholds that are comparable and fair across EU countries and farms.

On the other side, the monitoring of ABMs at slaughter poses the **below challenges**:

- If the outcome is used for legislative purposes, slaughterhouses are less likely to offer this service, as they are commercial enterprises and know that their customers are going to be concerned about the result of monitoring and they might send their pigs to other slaughterhouses. Therefore, it is likely that slaughterhouses will be reluctant to invest if data have to be handed to the competent authorities, in particular in countries that still practice tail docking. Therefore, several members consider that for measuring ABMs at slaughter, the purpose should be only to give feedback to farmers to improve welfare at farm. It is important that slaughterhouses support this activity in their premises, as competent authorities cannot organise themselves independently in the slaughterhouse.

- The size of slaughterhouses plays a role on how easily they can undertake the monitoring of indicators. Big slaughterhouses can better adapt to the monitoring than small ones.

- Although the results from monitoring ABMs at slaughter can be easily interpreted by farmers and farm veterinarians, the competent authorities may find difficulties to interpret ABMs, as they lack the context and history of each farm, i.e. the reasoning behind a finding (e.g. a short tail may be due to tail biting, mycotoxins in the feed, problem at the nursery unit etc., factors known to the farm vet but not to the official vet).

- The harmonisation of a monitoring system across slaughterhouses in EU is a challenge that needs to be addressed before ABMs monitored at slaughterhouses are used for enforcement of legislation. There needs to be clearly defined indicators, scoring system and thresholds to measure the seriousness of any case, so that official vets can report back serious animal welfare cases at slaughter (it should not be up to each competent authority to define the criteria). For legislative purposes, participation of all slaughterhouses is indispensable, as otherwise the farmers might choose to take their pigs to non-participating slaughterhouses.

Member States' experience

Swedish experience: In Sweden, the competent authorities have an agreement with the slaughterhouses to collect tail lesions. Slaughterhouses own the data but competent authorities are allowed to receive the results when needed, including when providing data to the Commission. The system has worked well for a long period. Both the industry and competent authorities wish to expand the system to more ABMs than tail lesions, as the aim is to detect the problems as soon as possible. Official veterinarians working in slaughterhouses report to control authorities and when needed, inspectors pay a visit to farms.

Finnish experience: In Finland, the situation is similar to Sweden. The meat inspection data is owned by the slaughterhouses and not by the competent authorities. Meat inspection is done by competent authority (not working for the slaughterhouse) and the data collected from slaughterhouses can be used for many different purposes, including legislative measures and helping farmers to improve welfare. The same data is used for a national subsidy. Also, some of the slaughterhouses pay farmers higher prices if they provide good quality carcasses. The slaughterhouses are in favour of developing these measures because they wish to have good quality carcasses¹. Data is only sent to the farmer and the farm veterinarian. Current legislation stipulates that if the amount of tail lesions or shoulder ulcers (in sows) in a batch of pigs is double than the average, a report is sent to the official vet inspector that goes to the farm to check the situation. Therefore, the data is already used for legislative purposes and also feeds health recording schemes.

¹ Bad carcass quality slows down the work and is expensive when there are a lot of abscesses which need to be removed. High through output slaughterhouses in Spain and Portugal frequently do not lose time to clean the carcass - even if the lesion is small, the whole carcass is rejected.

8. Who monitors Animal welfare indicators at farm

Several members are of the opinion that the farm vet is the most appropriate person to monitor welfare at farm, as the farmer is present on the farm continuously and lacks the fresh impression of a person that visits the farm occasionally.

In Sweden, there already exists a checklist for the farm vet linked to each farm. It covers legislative requirements such as cleanliness and use of medicinal products, for which the farm vet signs that they are complied with. This information is kept by vets and farmer holds a copy, but if a problem occurs the farm vet can give it to the competent authority.

9. Proposed Animal based indicators (ABMs)

Members proposed the following indicators according to category of pigs, for possible use both at farm and slaughter (where applicable):

Rearing pigs: tail condition (already requirement in legislation), lameness, bursitis and skin lesions.

Sows: shoulder ulcers, lameness, bursitis and body condition score.

All categories (sows, suckling piglets, weaners, rearing pigs): mortality at farm.

Monitoring of lameness at farm is very important because it cannot be detected at the slaughterhouse, as lame animals will never arrive there. One can observe different results in different animal categories of the same farm.

As regards slaughterhouse ABMs, a member is of the opinion that the existing system of ante and post mortem inspection is largely sufficient as it allows the competent authority to report negative welfare findings, e.g. tail biting, lame pigs, dirty pigs etc. this is why I have a difficulty to identify good indicators that we could use on top of the system we already have. According to this member, the only indicator that would have an added value on top of the existing system would be the tail length for countries that continue to tail dock, in order to assess the progress towards non tail docking.

10. Databases

Some members were of the opinion that there should be a database to collect available data on animal welfare indicators to be able to analyse them or use them for benchmarking. Significant data is already collected by farmers but not gathered and managed together. Often indicators are monitored in different ways and not always transparent and usable. The EU legislation could require Member States to establish national databases to serve this goal.

A system similar to the Italian Classyfarm could gather data for all indicators (including from slaughterhouses) and summarise the situation on farms. The owner of the data should be the farmer, who has access to all the data. Other professionals connected to the system, such as the farm and the official veterinarians are allowed to see their own part of the data. This kind of database could measure the progress in the farms as well as be used by the competent authorities.

In particular mortality could be collected and put in a central database according to different age groups (e.g. suckling piglets, weaners, fatteners) and for certain periods of time, in order to steer the risk based controls of the official veterinarian.

11. Possible derogations

No member supported that there should be derogations for small establishments for the monitoring of ABMs. Small and backyard farms are defined differently among Member States, but they are still farms and should respect welfare and biosecurity rules.

A member pointed out that whatever the measures, legislation should take into account the needs of small slaughterhouses as they are expected to make investments and should not be affected negatively.

12. Policy indicators

Policy indicators can measure the progress of policy objectives over the years. This is relevant for the tasks of national competent authorities and Commission.

Members suggested the following indicators that could serve policy objectives:

- a) Number of pigs with intact tails (which can be easily measured at the slaughterhouse).
- b) Number of farms that do not confine the sows in sow stalls and around farrowing (ban of cages). Although this may be a requirement in the new animal welfare legislation, it could serve as an indicator during the transitional period.
- c) Number of farmers that subscribe to higher welfare standards, i.e. organic farming, animal welfare labelling, would demonstrate the uptake of the overall objective of the Farm to Fork Strategy to improve animal welfare. This would be independent of the compulsory or voluntary nature of animal welfare labelling. However, it could be complicated for countries that do not have animal welfare labelling schemes but have high welfare standards, i.e. Finland.
- d) Number of farms that have higher national requirements (stricter welfare rules), e.g. on space allowance or other, than EU minimum requirements.

A member pointed out that indicator a) can be instantly implemented, as it has to do with farm management. On the contrary, indicators such as b) having to do with housing conditions, need investments and therefore long transitional periods which could complicate the follow-up of policy uptake. It was also mentioned that the policy uptake may be affected by other EU policies, i.e. the environmental rules on emissions that limit the possibility of farmers to extend their farm space to accommodate loose farrowing or higher space allowances.

13. Training on indicators

All interventions expressed very positive views regarding the training of farm staff.

A member proposed that the new legislation should build on the existing provision of Council Directive 98/58/EC that already requires that staff should possess the appropriate ability, knowledge and professional competence, by adding that keepers should be also aware of ABMs.

Other members underlined that training farmers on animal welfare as a whole, and not only on animal welfare indicators, is the basis of good management. The training provides to farmers an understanding of the reasoning of different provisions and motivates them to inspect legislative requirements and improve welfare.

Several members supported the mandatory training of all involved people, i.e. the owner, stocking people and veterinarians. Several members were of the opinion that farm veterinarians should be the first target group of training on ABMs, as they constitute the most appropriate professionals to bring the knowledge to farmers.

Continuity and frequency of training emerged as very important, as well as coverage of different topics. Frequency should be at least yearly (or even more often in clever ways e.g. in the form of short videos projected during lunch time and accompanied by questions).

The development of guides for the organisation of farm level trainings in different areas would be also helpful.

14. Discussion

The members had distinct views as regards the end goal of monitoring animal welfare indicators for farm welfare.

Most views expressed supported the idea that ABMs can serve as a tool to achieve progress in welfare. In particular, regular monitoring at the slaughterhouse of what happens at farm level can show whether a strategy e.g. for reducing the level of tail biting, is successful or not. Any changes on the farm (e.g. management procedures, diet, use of different breeds etc.) would be assessed for their effect on welfare through the frequent monitoring of specific indicators. However, there were few members questioning the

value of establishing a monitoring system in slaughterhouses with the purpose of improving welfare. In addition, most views expressed supported the idea of monitoring ABMs at farm level, as this type of monitoring is able to detect welfare issues non-reachable by monitoring at slaughter, thus contributing to welfare improvement.

As seen under the detailed chapters, the purpose of using ABMs for the enforcement of legislation was discussed more extensively in the frame of monitoring ABMs at slaughter. Some members argued that monitoring ABMs is not appropriate for enforcement of legislation, while others see no obstacles in this regard.

Some members find that both purposes can be combined and served by the monitoring of ABMs at slaughter. A member underlined that the legislative thresholds will be set in a totally different level from those used to motivate farmers to improve welfare. In this regard, the worst farms will be caught by the legislative threshold but all farms will benefit from receiving feedback.