

Meeting of the sub-group on the welfare of pigs

Seventh meeting, 07 November 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 Council Directive 2008/120/EC

1. Context by the Commission

The Commission explained that among other tasks, the subgroup was mandated to review of existing relevant EU legal provisions. In this meeting the subgroup examined the provisions of Council Directive 2008/120/EC.

2. Examination of Council Directive 2008/120/EC

The subgroup examined the provisions of the said Council Directive one by one, as follows:

A. Scope (Article 1)

Some members suggested that the scope should target pigs kept for farming purposes, as defined in Council Directive 98/58/EC. Others also proposed a reference to economic activities, to leave out pigs kept as pets.

B. Definitions (Article 2)

Members proposed the below changes:

‘Gilt’: a female pig from service until farrowing. This is because in the current legislation, ‘gilt’ is conflicting with the definition of ‘rearing pig’, resulting in having two different starting points for gilts.

‘Dry pregnant sow’ should be replaced by ‘dry sow’, as according to the definition, it is not pregnant all the time.

'Farrowing sow': it would be more accurate to replace with 'farrowing and lactating sow'.

New definition for enrichment material is needed to take into account the elements of Commission Recommendation (EU) 2016/336, e.g. that the material should be edible, chewable etc., so there is no ambiguity as to what is enrichment material. Some members prefer the term, 'manipulable' material instead of enrichment. Only one term should be used. Likewise approach for nesting material.

'Boar': it should be added that the pig may also be intended for heat detection, not only breeding. Many farms also keep teaser boars with this purpose.

Members also referred to the possibility of having a definition for 'farm', 'animal welfare indicators' and defining the age group to which the legislation is applicable.

C. Space allowances (Article 3 paragraph 1)

Some members suggested the legislation should incorporate the recommendation of EFSA and also expand the categories of pigs heavier than 110kg, given that slaughter weights tend to get larger over time.

Some members raised the issue of free access feeding and resting stalls. These are sow stalls or crates open at the back so the sow can enter and exit on her free will. The issue lies on whether this area can count as unobstructed floor area or not.

In Germany, only the inner space of the crate or stall may be calculated in the unobstructed floor area, but the space corresponding to the iron bars is deducted. Moreover, in Germany and Sweden, only if the sow can use the area for lying down freely can the area be considered as unobstructed (standing and eating is not enough).

Other members disagreed with this interpretation considering that this area is unobstructed as long as the sow can enter and exit on her will. In addition, a member recalled the debate around the preparation of this Directive in 2000, when there was agreement that this area can be calculated as free space. Also, these free access stalls are needed in farms that do not use electronic feeding systems.

Free access stalls offering in addition the possibility to close and open by the sow also exist. These prevent animals from being disturbed by conspecifics. However, if there are a lot of sows that lock themselves in the crates fearing to come out, then the area cannot be considered as unobstructed any more. Moreover, if the space is limited then the sows enter the free access stalls for safety and they do not use the whole area.

A member commented that if the area in the crate is counted as free, the space left behind the crates i.e. the group area, tends to be quite small. This may also include the aisles.

D. Flooring surfaces (Article 3 paragraph 2)

As regards the *size of the slats*, several members pointed out that the current figures for the openings of slats do not work with solid floor when straw is provided on it, given that the use of straw is very important in relation to the prevention of tail biting. However, the straw is inevitably moved in the slatted part of the floor and mixed with manure, forming clots that are not able to move through the slats of the current small sizes.

Regarding the *percentage of openings* that a solid floor should carry for drainage, several members are of the opinion that the current 15% of floor openings is high. A member mentioned that if the openings of a fattening unit with a fully slatted floor of 18mm width slats, is calculated the result will give 15% of openings. Therefore, the wording of current legislation is contradictory when saying that continuous solid floor must have a maximum of 15% of drainage openings. Also, a drained floor should have a lot less than 15% openings.

Some members expressed the opinion that terminology should be clarified to distinguish between solid, drained and slatted floor. They pointed out that there is no science to show how pigs perceive the current 15% of the floor openings and whether they feel the floor is solid or slatted.

Denmark has defined in its legislation openings of 10% for drained floors, based on practical experience showing that it can work with straw and at the same time, urine and water can be drained away from the floor.

Some members reported *other difficulties*, in particular to explain to veterinarians the notion of 'continuous' solid floor as described in the Directive. In addition, the expression 'concrete slatted floors' creates confusion as to whether the provision is applicable only to floors made of concrete or also to plastic and other types of materials.

Some members supported that it is very costly to change the flooring of farms, which was adopted to the requirements of current legislation in 2013. They also reported difficulties to use straw for rearing pigs, especially in the south of Europe. However, other types of manipulable materials may be used.

E. Freedom of movement (Article 3 paragraph 4)

As regards issues around *group housing and mixing* of sows, they will be discussed in a separate meeting of the subgroup. Some members already expressed their opinion that the use of free access stalls and crates entails the risk of fearful sows staying in the stalls, which would not be compatible with group housing.

Moreover, some members informed about the interest of farmers to group house sows in the farrowing unit, especially during lactation. This trend was spotted in Germany following the introduction of the national legislation on loose housing of sows in the farrowing unit. Farmers are enthusiastic as they think it requires less space. The future EU legislation may take this trend into account.

As regards *pen side*, a member recalled the relevant debate when this Directive was discussed in 2000. The 2,8m was meant as the length between the back ends of two rows of crates or the length between the back end of a row of crates and the walls. The intention of the Directive was to ensure that nowhere in the group housing pen should there be less than 2,8m free space, which was considered the space required for two sows to pass each other without being intimidated. Less space in group housing would bring severe problems of aggression among sows. The existing derogation concerns only farms that have less than 10 sows, because it can be difficult to apply group housing with so low number of sows.

Despite the above, when the legislation started to apply at the end of 2013, the length of 2,8m was considered the distance from wall to wall. This interpretation resulted frequently in having small aisles between the rows of crates. In general, the exact meaning of pen side is understood differently in the Member States.

Several members supported that the current 2,8m of pen side is rather small. The Danish legislation foresees 3m of pen side, based on practical experience for the avoidance of aggression between sows. Another member also recommended a 3 meters distance between the back end of two rows of crates. However, other members consider that a change of this value in legislation is not possible as it would require a relocation of walls and would have a high impact to farmers, who already rebuilt their farms in 2013.

With regard to the expression *turning around easily*, some members pointed out its meaning should be specified, as there may be different interpretations. In their opinion, the sides of the pen must be longer than the length of the pig, however some say that the pig may also bend itself to turn around.

F. Permanent access to manipulable material (Article 3 paragraph 5)

A member underlined that the provision addresses only sows and gilts, as it was designed for the transitional period from crating to group housing systems. However, it basically applies to all pigs so the legislation should contain a single provision saying 'all pigs shall have permanent access to suitable amount of manipulable material or enrichment'. Several members agreed with this suggestion, in addition to the idea of having a definition of manipulable material, to ensure it is functional. Nesting material should be approached in a similar manner.

A member underlined that the provision of enrichment in existing crates would be difficult but it will be essential for loose housing, where all animals should have permanent access. The transition from one system to the other will be challenging, as crates are not suitable for offering enrichment.

Also, permanent access to enrichment is very difficult in slatted floors, so solid floor is good. If straw racks are used, they should not be placed very high so the pigs can reach them and the distance between the bars of the racks should not be too narrow, as the pigs cannot get the straw out.

G. Provision of sufficient food (Article 3 paragraph 6)

Members are of the opinion that this provision should not apply to sows and gilts only, but to all animals, which should be offered sufficient food even in the presence of competitors. It is crucial for the avoidance of tail biting in weaners and fattening pigs and sometimes it proves even more important than the provision of straw. At the moment, this requirement is open and very differently interpreted in Member States.

Therefore, there is a need to establish a maximum number of pigs and a minimum length of trough, for different feeding systems - at least the most common - as well as a maximum number of pigs per drinker. Requirements for dry feeding, liquid feeding and individual feeding systems for sows (electronic), are considered reasonable. Requirements on feeding space are already applied in most countries that raise pigs with intact tails.

H. Feeding of pregnant sows and gilts (Article 3 paragraph 7)

In Germany, a fixed percentage applies for fibre content in the feed for sows. Some members have the opinion that this approach is not optimal, as pigs cannot be fully satisfied with this method of fibre provision. Therefore, pregnant animals should have unlimited access to roughage and of course, offered high energy ratio to provide for their needs. Farms can manage to balance the risk of overweight pigs by offering roughage of low energy.

Italian legislation foresees that roughage should always be present both in the ratio and in addition to it (separately). The results of this approach are considered positive.

A member referred to the high frequency of stomach ulcers in sows. Although the exact causes are not known, the provision of roughage separately from the feed can alleviate the problem. It is also very important to give roughage to the sows prior to farrowing, in order to enhance the motility of their gastrointestinal system. Therefore, roughage should be given to sows in all stages of pregnancy.

I. Individual pens (Article 3 paragraph 8)

Most members are of the opinion that there must be enough sick pens, also considering the need for the management of tail biting. In terms of quantity, several members suggested a fixed percentage (X %) of the number of animal places. A member questioned the purpose of setting a percentage, as it usually represents a minimum requirement which cannot reflect the conditions in all farms.

Some members also suggested soft bedding, as per Council Directive 98/58/EC, and 20% more space than a normal pen. A member proposed the subgroup has a separate discussion on the design and the space allowance of sick pens.

Regarding the exact number of sick pens, members shared their experiences as below:

- In Finland, at least 5% of the animal places should be allocated to sick pens. This is a recommendation that will soon come into force. A member regarded 5% as very high for sick animals other than those related to tail biting (1% could be enough for other causes).
- In Germany, there is a general recommendation for newly built farms to assign 3% of animal places to sick pens, in fatteners' and weaners' units. A 5% of animal places is asked for sows, through obligatory guidance.
- In Denmark, it is up to farmers to decide how many sick pens they need, but they should always have one space ready for a sick pig, in case it is needed. More than one animal is allowed in a sick pen and the space of the sick pen is double than that of an ordinary pen.
- Sweden has similar requirements to Denmark, complemented by a general advice to allocate one sick place per 25 animals, i.e. 4%.
- In Portugal, it is mandatory for new farms to have a small building, separated from the main one, which houses the sick animals. There are also 1-2 sick pens in the main building. A member disagreed with the idea of moving sick animals for a long distance, both for the sake of animals but also to not put burden to stock workers.
- In Italy, there is a requirement to use wired mesh in the gate of the sick pen, so pigs have visual contact with other animals. Also, inspectors check that the sick pens are marked as 'infirmary' or with a cross, which indicates that the farmer has acknowledged the requirement to have sick pens.
- European Reference Centre for pigs welfare recommends a 2,5% of animal places.

J. Training and competences of farmers (Article 6)

In general, members think that there should be adequate training - providing only instructions is not enough.

A member suggested the new legislation should be inspired by the 'broiler' Directive and adjust its provisions to pigs.

As regards *who is to be trained*, a member considers important that the person who has the daily responsibility of the animals has sufficient knowledge, through training and acquisition of a certificate of competence. The farmer or the owner are not necessarily that person. This person is expected to cascade the knowledge to other staff later on.

Some members consider that the training of handlers is more important than the training of the owners, however, very often the managers are trained instead of the workers. In addition, it is very important that all involved people are trained, including the vets and the trainers themselves.

In terms of *type and content of training*, it should not be only theoretical but also practical, given by a vet. In Portugal, the national pig farm association is building - in collaboration with a university - a farm with 500 sows to serve as a training center.

A member suggested to build a common agenda of topics that all farms must attend as a first step, followed by a training tailored to the needs of the farm. People working with animals should be able to understand their feelings, including for all pig categories, e.g. piglets, sows, fatteners. Training around the prevention of tail docking is very important, as the observation of the behaviour of the animals is time consuming and difficult to teach to workers.

Sweden and Denmark have specific requirements in legislation for training of people who carry out castration using an anaesthetic. It comprises of a half-day theoretical part followed by a test and an on-farm training with a vet. In Sweden, there are another two courses on administration of medication and biosecurity. Training around medication is considered also very important to ensure safe and correct use of medication and avoid medical treatment of animals by unknowledgeable people.

The scarcity of people seeking a job in the pig industry, usually results to workers having no experience with pigs. Therefore, farmers are asking for training targeting the workers. The language barrier is also a challenge, as many workers do not speak the local language. The pig sector in Denmark has produced material for the transfer of knowledge to other staff. These consist of voluntary, free, online courses in English and other languages, which one can follow also from the office/home. In Sweden, there are a lot of farm advisory courses but none really addresses animal welfare.

As regards the *frequency and duration of training*, a member proposed once per year, even every 6 months, if feasible. The training should be comprehensive and not just one day.

Denmark requires either completed studies in an agricultural school or a training course of 35 hours. In Italy, the owner of the animals has to have at least 5 or 10 years of experience of managing a fattening or breeding farm, respectively. Apart from that, the farmer has to hold a relevant degree e.g. in agriculture or pass a special training course, attested by a diploma. The farmer also has to ensure that the information is passed on to the handlers. Since 2019, the verification of training is part of a checklist that official vets use during inspections. To verify if the handlers have the necessary knowledge, inspectors check the attestation or can also interview them.

K. Reporting by Commission (Article 7)

This provision would not be necessary if the new legislation is a Regulation.

L. Inspections by Competent Authorities (Article 8)

A member pointed out that inspections should be carried out in all Member States, as the different level of respect of welfare rules by farmers creates a distortion of competition.

M. Imports from non-EU countries (Article 9)

Commission asked the members if this provision can be extended to products of animal origin (at the moment, it covers only animals).

A member highlighted the different cost of production in systems worldwide. As EU cares for animal welfare, it would be important that countries exporting to EU have the same level of welfare. Certification is a means of ensuring a similar level, but it is essential to define in detail how it must be done. Mutual inspections should also take place.

Other members pointed that the provision works for imported animals, as they are very few, mainly breeding pigs. However, if it is extended to cover products of animal origin, the impact will be different and therefore, the matter is largely political.

Most members agreed with the idea but questioned whether it is possible under the WTO SPS agreement.

N. Possibility of Member States to apply stricter rules (Article 9)

For Sweden, Germany and Denmark, the possibility of keeping this provision is important.

O. Environmental conditions (Annex I, Chapter I, points 1 and 2)

Some members were in favour of setting thresholds for environmental parameters.

As regards *noise levels*, several members find that 85db is high. It is very important for the animals to be able to hear each other, especially that sow can hear the piglets.

In Sweden, there is a limitation of 65db for mechanical noise which is allowed to reach 75db during hot temperatures, when the use of ventilation is necessary. A member suggested differentiating mechanical from pig noise, as pigs are quite noisy animals.

Regarding *light intensity*, several members agreed with the current threshold of 40 lux, but emphasised the need to require a daily (day-night) rhythm, i.e. 8 hours of continuous light.

Some members referred to certain animal welfare friendly systems as well as outdoor farming, where the lying area is accommodated in boxes darker than 40lux. Pigs like to rest in a darker area. Members proposed flexibility wording to allow for these cases.

Another particular case is the farrowing unit, as sows are frequently supervised late in the evening. Hence, it might not be possible to guarantee a continuous 8 hours darkness in this unit.

A member underlined that the 8 hours of light must be respected and farmers should not use darkness to avoid tail biting.

In terms of *gas concentration*, Sweden has established thresholds for NH₃ and Germany for NH₃, H₂S and CO₂.

P. Accommodation for pigs (Annex I, Chapter I, point 3)

Concerning *physical comfort*, some members find that it cannot be achieved in fully slatted floors and suggested that the legislation should set concrete rules on the issue, according to the EFSA recommendation. A member disagreed with this view, as solid floor without any drainage is difficult to be kept clean and dry. The problem will probably worsen under loose housing of lactating sows, although the design of the pen offers distinct pen areas for lying and dunging.

In terms of *thermal comfort*, some members emphasised it is not easily achieved in the south of EU during summer, where natural ventilation is normally applied. Under such conditions and with solid floor, pigs frequently decide to be covered with manure in an attempt to reduce heat stress. Such a condition is not owed to bad management or high stocking density. In addition, during hot periods, pigs choose to sleep on the slatted part of the floor.

With regards to *resting and getting up normally*, scientific evidence is quite old. Taking into consideration the space a sow needs to lie down and get up normally, without any hinder, some members are of the opinion that existing free access stalls are very small. Therefore, their dimensions should be discussed further. Farrowing crates present the same problem, but the new legislation will phase them out. For group housing of pigs, resting and getting up normally does not consist a problem.

Q. Examples of manipulable material (Annex I, Chapter I, point 4)

A member is of the opinion it is not necessary to give any examples, provided the new legislation clearly defines the material for manipulation and investigation activities, as discussed under Article 2 'Definitions'. Several other members supported the idea of a definition, some proposing that it should be rootable, chewable (better than edible) and destructible, others eatable and changeable. The term 'rootable' should be explained more, as it is not clearly defined in the relevant Commission Recommendation. In Finland, 'rootable' is defined as bedding-type material given in a quantity that makes it possible for pigs to root it into small piles. Although it is a vague definition, it gives an indication.

Drafting a list of suitable materials was considered difficult by some members, as it would be constantly debated. A member proposed to combine a definition with an open list.

In case a list is decided, a member proposed to add 'soft' wood so as to avoid the use of oak and other types of wood that do not fulfil the requirements of the relevant Commission Recommendation. Another member recalled that according to the said Recommendation, the material should be edible and therefore, wood and sawdust should be excluded from the list (non-edible) in the first place. In addition, soft wood would be a term open to interpretation. Other members disagreed with this view, supporting that wood should not be excluded. Pigs like fresh wood in several forms such as wood chips or branches, basically wood in small pieces that can be bitten and moved. Free range pigs are also interested in small trees. It is also a natural material.

A member suggested that mushroom compost should be also excluded as it presents microbiological risks as well as peat, since it is unwanted from an environmental point of view. Finally, according to that member, the acceptable materials are straw, hay and silage. Another member considers peat is a very good enrichment, as it comes in the right format.

On the possibility of assigning materials to different categories of pigs, e.g. for weaners, fatteners etc., members find that the age of pigs is not a relevant base for differentiation. However, the particle size of the material should be compatible with the mouth size of each pigs' category. Nest building material for sows should be described separately.

Members suggested the placement and location of the material is important, as pigs should be able to interact with it. Some members prefer the material is placed on the floor so it is reachable, while others accept also placing on a rack as long as it is possible that pigs pull it down on the floor.

Finally, a member is of the opinion there have already been many discussions on what manipulable material is and no change is needed in this regard.

R. General floor requirements (Annex I, Chapter I, point 5)

A member finds the ambition of this provision is low, as it focuses on the prevention of suffering, while it should aim at providing an environment to enable pigs perform the necessary behaviours.

Another member noticed that if EFSA's recommendation on solid floor is adopted in legislation, the above concern would be addressed and this provision would still be suitable. Moreover, there would be no need to define the width of openings discussed in previous provisions.

S. Frequency of feeding (Annex I, Chapter I, point 6)

A discussion took place around setting a maximum number of pigs per feeding space for different systems, length of feeding trough and number of sows per Electronic Sow Feeder (ESF). In addition, in group housing with ESF systems, sows should be protected from being prevented to eat, as there is always a lot of competition around feeding stations.

It was also proposed to set an animal feeding ratio, 1 to 1 for restricting feeding and 1 to 4 or 1 to 6 for ad libitum feeding (up to 1 to 12 also possible).

It was pointed out that partially ad libitum systems also exist (amount or time restricted), mostly applied in fattening units where the slaughter weight is high and there is a need to restrict the feeding of pigs above 120kg. In these cases, a member suggested that the feeding ratio should also be 1 to 4 or 1 to 6, even if the systems are not totally ad libitum. Other members disagreed, referring to Commission audits that found partly restricted feeding is still restricted and the ratio should be 1 to 1.

A member was in favour of not being prescriptive, as there are numerous feeding systems and in the end, feeding is part of a good management practice. On the other hand, a member emphasised it is worth avoiding competition around feeding as it is a key issue for the prevention of tail biting. Competition for feed is a huge problem for pigs that have been bred to eat and grow a lot. If there is competition around feeding, offering additional straw will do very little to solve the problem of tail biting.

Finally, Germany reported positive results following the change of legislation to set additional stricter rules for feeding systems, as it was observed that tail biting happens less and pigs are more uniform.

T. Access to water (Annex I, Chapter I, point 7)

It was suggested to set a ratio of 1 drinker per 12 pigs and a rule that pigs should be able to drink in a physiological posture. Therefore, the drinkers must be adjusted to the height of different categories of pigs (for 30kg, 100 kg etc.). It was also proposed to set a rule for having at least 2 drinkers per group of animals, to avoid thirst if a drinker breaks down or the situation where pigs of a low rank do not get the

opportunity to drink if dominant pigs are by the only drinker. The water pressure should be suitable for the age of the animals.

Some members suggested there is no good reason for providing water to piglets only over the age of 2 weeks and proposed to erase this rule. EFSA opinion also indicates that water is important for piglets. A member referred to systems where the provision of water is not possible, i.e. outdoor farrowing huts and farrowing systems with group housing in organic production that use nested boxes with deep straw bedding where sow and pigs stay for a week/10days post farrowing.

Members also consider important to clarify in legislation that fresh water must always be offered, even if liquid feeding is used. Pigs must have access to water separately from the feeding trough and Member States do not always have the right understanding.

U. Mutilations (Annex I, Chapter I, point 8)

Tail docking and castration of piglets have been discussed in separate meetings. As regards the reduction of corner teeth some members expressed their full support for EFSA's recommendation.

V. Specific requirements for boars (Annex I, Chapter II, point A)

Space allowance for boars and related issues will be tackled in a next meeting, so no comments were given.

W. Specific requirements for sows and gilts (Annex I, Chapter II, point B)

As regards the requirement for *cleaning the sows* before going to farrowing pen, most members find that it is rarely needed and even then, it is not necessary to be regulated in the legislation - if sows are dirty, a good management practice will lead to their cleaning, of course with water of acceptable temperature. Also, members find there is no welfare aspect for this provision. For biosecurity reasons, the pens should be cleaned rather than the animals.

With regards to the *nesting material*, several members are in favour of having a definition in a similar manner as for enrichment material, i.e. to clarify that offering a chain is not enough. Members also advocated for deleting the derogation linked to the slurry system.

X. Specific requirements for piglets (Annex I, Chapter II, point C)

As regards the *weaning age*, a member stated that many farms are currently moving from weaning at 21 to weaning at 28 days, because of the ban of zinc oxide.

Other members informed that farmers wean their piglets somewhere between 21 and 28 days. They suggested removing the general derogation for weaning at 21 days and only allow it for health reasons. A member regards the age of 21 days as too early to wean piglets without the need to use zinc oxide-feed additives (which are now forbidden) or antibiotics to prevent weaning diarrhoea. Especially if piglets, apart from being weaned, are also transported to another farm or even another country, which may usually end up with the whole batch of piglets being treated with antibiotics when they arrive at the new farm. At 28 days, however, piglets can perform well at weaning without antibiotics but it is still challenging and needs a very good environment and management.

Several members expressed doubts as to whether weaning at minimum 28 days is feasible, since there is a variation within the group, owed to the all-in-all-out principle, differences in mating, gestation length and farrowing time of sows etc. An average weaning at 25-26 days was considered reasonable. If 28 days were set as a minimum, the average weaning age would be at 30 - 31 days.

A member informed that in Sweden, many farmers wean piglets around the age of 35 days (5 weeks suckling) in order to have more robust piglets and to ensure that the youngest in the batch are not younger than 28 days, as it is not allowed to wean piglets less than 28 days of age. There is a derogation

from the general rule if farms apply a specific health control program with a) additional veterinary supervision every 3 months to oversee the environmental and management conditions (temperature, feeding etc.) and b) keeping health records (% treated piglets, mortality, belly nosing, tail biting etc.). According to the member, only a very small number of farms use this derogation, a fact that demonstrates that farmers prefer not to put extra time and effort to wean piglets less than 28 days of age.

A member had a different opinion, considering the legal provision on weaning should stay as it stands now. According to the member's experience, weaning between 21 and 28 days does not make a big difference. The derogation is also needed due to big litter sizes.

Regarding the wording '*weaned from the sow*' some members supported it should stay in legislation, to avoid the use of artificial rearing systems which have become popular for large litters and high productivity. A member considers that the use of artificial systems is inevitable in cases of litter size as big as 20 piglets or when sows have a very long lactation period. In these cases, artificial milk would be impossible to avoid, even if given after 15 or 21 days.

A member pointed out the challenge of *verifying the weaning age*, between 21 and 28 days, during official controls. The European Reference Center for pigs' welfare acknowledged this difficulty.

Y. Specific requirements for rearing pigs (Annex I, Chapter II, point D)

The provision was not discussed.

3. Summary of meeting and next steps

The next meeting is scheduled for **13.12.2022**, dedicated on **space allowances and floors** for pig categories other than weaners and rearing pigs.

Members were invited to provide to the Commission any data they referred to during the meeting.