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FINAL REPORT OF A MISSION
CARRIED OUT IN GREECE
FROM 7 TO 11 MAY 2007
CONCERNING ANIMAL WELFARE STANDARDS
ON PIG AND LAYING HEN FARMS



EXECUTIVE SUMMARY

This report describes the outcome of a mission carried out by the Food and Veterinary Office (FVO) in Greece, from 7 to 11 May 2007.

The objective of the mission was to verify the implementation of EU animal welfare legislation applicable to pig and laying hen farms and how measures taken in relation to these have been integrated into the requirements for control laid down in Regulation (EC) No 882/2004 and to follow up the recommendations from Report DG SANCO/8522/2002.

The report concludes that although measures have been taken to set-up a control system for welfare on farms, many of the steps taken have been long after the EU requirements came into force and for certain procedures in anticipation of an FVO inspection. The actions, apart from one legislative change, which had been taken by the CCA following a previous FVO inspection five years earlier were either inadequate or so recent that they were not yet implemented by the other levels of the CA. The lack of involvement of a high proportion of Prefectures in carrying out checks and the chronic staffing problem further undermine the ability of the CCA to ensure that EU requirements for animal welfare are being respected. The quality of inspections has generally not been sufficient and the results which have been reported are unreliable. Insufficient measures have been put in place by the CCA to first identify and then to remedy these issues.

The report makes a number of recommendations addressed to the Greek competent authorities, aimed at rectifying the identified shortcomings and further enhancing the control measures in place.

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1. INTRODUCTION

The mission took place in Greece from 7 to 11 May 2007, as part of the planned mission programme of the Food and Veterinary Office (FVO).

An opening meeting was held with the competent authorities of Greece on 7 May 2007. At this meeting, the objectives of, and itinerary for, the mission were confirmed by the inspection team and additional information required for the satisfactory completion of the mission requested.

The inspection team comprised two inspectors from the FVO and one national expert, and was accompanied throughout the mission by a representative from the Central Competent Authority *The Ministry of Rural Development and Food* MRDF (hereafter: CCA).

2. OBJECTIVES OF THE MISSION

The main objective of the mission was to verify the implementation of EU animal welfare legislation applicable to pig and laying hen farms, in particular the measures put in place to give effect to Council Directives, 91/630/EEC^{1,2}, 98/58/EC³, 99/74/EC⁴, Commission Directive 2002/4/EC⁵ and Commission Decision 2000/50/EC⁶ and to follow up the recommendations from Report DG SANCO/8522/2002 (hereafter: Report 8522/2002). The mission also looked at how measures taken in relation to the above are being integrated into the approach required by Regulation (EC) No 882/2004 of the European Parliament and of the Council⁷.

¹ Legal acts quoted in this report refer, where applicable, to the last amended version.

² Council Directive 91/630/EEC of 19 November 1991 laying down minimum standards for the protection of pigs, OJ L 340, 11.12.1991, p. 33, (hereafter: Directive 91/630/EEC).

³ Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes, OJ L 221, 8.8.1998, p. 23, (hereafter: Directive 98/58/EC).

⁴ Council Directive 1999/74/EC of 19 July 1999 laying down minimum standards for the protection of laying hens, OJ L 203, 3.8.1999, p. 53, (hereafter: Directive 99/74/EC).

⁵ Commission Directive 2002/4/EC of 30 January 2002 on the registration of establishments keeping laying hens, covered by Council Directive 1999/74/EC, OJ L 30, 31.1.2002, p. 44, (hereafter: Directive 2002/4/EC).

⁶ Commission Decision 2000/50/EC of 17 December 1999 concerning minimum requirements for the inspection of holdings on which animals are kept for farming purposes, OJ L 19, 25.01.2000, p. 51, (hereafter: Decision 2000/50/EC).

⁷ Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules OJ L 165, 30.4.2004 corrected and republished in OJ L 191, 28.5.2004, p. 1, (hereafter: Regulation (EC) No 882/2004).

In pursuit of these objectives, the following meetings were held and sites visited:

COMPETENT AUTHORITY VISITS			Comments
Competent authority	Central	2	Opening and closing meetings.
	Regional	2	The Prefectures of West Attica and Larissa.
FARMS			Comments
Pig holdings		2	A laying hen farm and a pig farm in each Prefecture were selected by the inspection team from a list of farms provided by the CAs.
Laying hen holdings		2	

3. BACKGROUND

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 and indicated that no instructions were provided on how to measure or calculate the slope of cage floors, which had been unsatisfactorily carried out.

A previous mission concerning the welfare of farm animals took place in Greece from 10 to 14 June 2002. Report 8522/2002 of that mission concluded that the system in place before March 2002 was inadequate and that 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 would be required to ensure that this level of inspection is maintained and becomes established throughout the country. The number of personnel involved at central level was inadequate, and it would be difficult for the prefectural and local services, with current resources, to sustain the level of inspection seen during the mission. Actions taken in response to the recommendations made in Report 8522/2002 are indicated in the relevant part of the current report.

4. LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation, in particular Article 9 of Directives 99/74/EC and 91/630/EEC, Article 7 of Directive 98/58/EC and Article 45 of Regulation (EC) No 882/2004.

5. MAIN FINDINGS

5.1. Competent Authority

The CCA stated that the organisation of the Competent Authorities (hereafter: CA) at local and central level regarding controls on protection of animals on farms is described in the Country Profile DG(SANCO)/7741/2005, which is available under this reference on the DG Health and Consumer Protection website http://ec.europa.eu/food/fvo/country_profiles_en.cfm.

At central level, one person is fully dedicated to animal welfare for all its aspects with the support, since last year, of an official.

Prefects allocate the resources and staff in their Prefectures; however, the CCA indicated that they could provide seasonal staff to the Prefectures, e.g. diseases eradication programmes. The CCA also indicated that the Prefects report to the Ministry of Interior.

Report 8522/2002 on animal welfare on farms recommended 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). The CCA indicated that they had requested to the Prefectures to send them proposals on how they intend to meet this recommendation; however, despite numerous requests by the mission team, no replies from the Prefectures were provided by the CA. The Director in West Attica indicated that only 12 of the 20 posts are filled and that since 2004 he had sent six letters to the Prefect on this issue. The Directors of both Prefectural CAs indicated that due to lack of staff they have to prioritise other tasks, such as food safety and animal health over animal welfare.

The authorities responsible for controlling the labelling of eggs, as required by Commission Regulation (EC) No 2295/2003⁸ are the Directorate of Veterinary Public Health of the Directorate-General of Veterinary Affairs which is responsible for checking the labelling of eggs at egg packing centres; the National Food Agency is responsible for this when the eggs are placed on the market.

Training

In response to a recommendation in Report 8522/2002 the CCA indicated that training of veterinarians would continue in this field with courses scheduled for October and November 2002; however, no records or supporting documentation was available to indicate that any courses on animal welfare on farms had been organised since the last mission on this topic in June 2002 committed. The CCA indicated that a two day training seminar on animal welfare on farms is foreseen for September this year.

A coordination meeting was held with seven Prefectures concerning protection of farm animals a few days before this mission, the CAs of both Larissa and West Attica were invited but only West Attica attended. Instructions were given regarding inspection of laying hen and pigs farms (e.g. dates for legal requirements to enter into force, measurement of slope and height of cages, bulky feed for sows, group housing of sows, access to manipulable material for gilts and sows).

In West Attica Prefecture officials indicated that the OV's had not attended any training on laying hens and pig welfare in the last five years, only discussions at the coordination meetings held at Central level, such as the one held on 2.05.2007, five days before this mission.

In Larissa Prefecture officials indicated that veterinarians from the field stations are trained during regular meetings, although there were no documents relating to these meetings.

Supervision and audits

Regarding supervision the following points were noted:

- The assessment of effectiveness of inspections is the responsibility of the animal welfare office of the Directorate of Animal Welfare, Medicines and Applications

⁸ Commission Regulation (EC) No 2295/2003 of 23 December 2003 introducing detailed rules for implementing Council Regulation (EEC) No 1907/90 on certain marketing standards for eggs, OJ L 340, 24.12.2003, p.16.

of the CCA. This office does not have legal powers to command the Prefectures as to how they should implement animal welfare policies.

- No measures were taken to verify the effectiveness of inspections, as required by Article 8 (3) (a) of Regulation (EC) No 882/2004, as although the CCA initially indicated that they evaluated inspection reports, during the mission a representative of the CCA stated that they do not check the reports which are sent from the Prefectures to verify their correctness.
- The CAs of the two Prefectures visited indicated that inspections are discussed at regular meetings.

No audits of the activities of the Prefecture services, as required by Article 4 (6) of Regulation (EC) No 882/2004, were carried out in 2006 concerning animal welfare on farms by the new specialised audit department, which indicated that they are planned in the near future.

5.2. Legislation

In response to a recommendation in report 8522/2002 to transpose Council Directive 99/74/EC into Greek legislation, this was done through Presidential decree 216/2003; however, this was 18 months after the date required for transposition. Report 8522/2002 also recommended that the CA ensure that the level of sanctions applicable for the commonly occurring deficiencies in relation to the relevant EU legislation is proportionate to the offence; in response to this recommendation the level of fines was increased from €10-30 to €300-1500.

5.3. Training of pig stock persons

Training courses for pig stockpersons had not been made available by the CCA, contrary to Article 5a of Directive 91/630/EEC; however, the CCA and the CA of the Prefectures visited indicated that the OVs inform and provide documents to stock persons during the inspections and that in Larissa meetings with pig farmers were held in 2004 and 2005. Brochures for owners or keepers regarding keeping of farm animals were not provided by the CAs to the inspection team as requested and there was no evidence that meetings with the sector to discuss animal welfare had taken place.

5.4. Registration of laying hen holdings

The competent authorities responsible for registration of laying hen holdings are the Prefectures. In both prefectures visited there were registration committees which were composed of several inspectors. Following an application by the farmer, checks for registration proposes are made by these inspectors, who take the measurements to establish the maximum capacity of the holding.

The mission team noted that:

- In West Attica there were 130 farms registered in 2005, 159 in 2006 and 176 in 2007. The OVs in West Attica indicated that the registration process of farms, which were in operation before 31.05.2003, had been ongoing and had finished in December 2006. In Larissa 8 farms were registered in 2005 and 10 in 2006; at least one other already operational farm was pending registration. Article 1 of Directive 2002/4/EC requires that farms should have been registered by 1 June 2003.

- In Larissa a farm with non-enriched cages was given the code 2, which is for barn eggs and which would allow inappropriately marked eggs to be placed on the market, contrary to Article 8.2 of Regulation (EC) No 2295/2003.
- In West Attica, although a system for registration is in place the documents for registration purposes were not complete as the maximum capacity (number of birds) had not been established, contrary to Article 1(1) of Directive 2002/4/EC. In Larissa, a system for registration is also in place but not all the documents for registration purposes were available in the office. Inspection reports were missing, maximum capacity was not recorded for all farms and in certain cases where it had been, discrepancies were noted between the number of birds recorded in the handwritten register and the computerised register. In addition, the inspection team found the maximum capacity to be different from that registered for the farm visited.
- The maximum capacities for the 36 farms with alternative systems for laying hens in West Attica had not been updated to reflect the new requirements which had entered into force on 1.1.2007 such as the length of the feeding trough, drinking devices, the number of nests and perches and which needed to be taken account in order to establish the maximum number of birds which could be kept in the establishment. The capacities of the farms had been determined on the basis of the usable area and as the adequacy of the perches had not been taken into account, almost twice as many birds were present on the farm visited than allowed by Article 4.1.1 (d) of Directive 99/74/EC.

Regarding labelling of eggs, the inspection team noted during the inspection in Larissa that due to a machine malfunction the code stamped on the eggs was illegible, nevertheless, as the farmer indicated, these were about to be placed on the market, contrary to Article 8.2 of Regulation (EC) No 2295/2003, and the CA did not take any action.

5.5. Inspections

Selection of farms and programme of checks are set by the Prefectures following the CCA instructions of 28.03.2002 which among other topics indicates that the selection of holdings should be both random and representative and that the selected farms should be checked at least once each quarter. The circular of 19.04.2007 specifies the criteria for selecting the holdings to be inspected, such as the number of animals on the farm, the number of movements and the results of previous checks. The CA in Larissa indicated that the requirement for checking the selected farms once each quarter is not achievable, as due to lack of personnel, they have to prioritise their work.

The inspection team noted that:

- Regarding laying hens, both Prefecture CAs indicated that their target is to inspect 100% of the registered farms every year. In Larissa reports from 2005 indicated that the eight registered farms were checked and, although in 2006 a further two farms had been registered the same eight farms as had been checked the previous year were checked again. In West Attica the Prefecture OVs indicated that 10 (8%) farms were checked in 2005 and 47 (30%) in 2006.
- Regarding pigs, there was no documented programme of inspections for any year including 2007 in either of the two Prefectures. In West Attica in 2005 two out of

six farms were checked; however, only two farms are currently registered and the CA plan to inspect them every year. In Larissa, the CA indicated that their target is to visit 10% of farms. In 2006 this target was almost achieved and half of the farms were selected on the basis that they had not been checked in the last three years and half on criteria such as the result of the previous inspection or movement of animals. Although this approach does take into account certain risk factors, a more systematic assessment of the risks which influence animal welfare has not been carried out, as required by Article 3.1(a) of Regulation (EC) No 882/2004.

- In Larissa the inspections carried out were not representative of the different rearing systems, contrary to Article 7.1 of Directive 91/630/EEC as the farms with less than 10 sows are not included in the programme of inspections.

In addition to the instruction of 28.03.2002, which had not been fully implemented at the time of the previous mission, the CCA issued a further instruction on 16.07.2003 which indicated the dates after which various requirements for pigs and laying hens had to be implemented. A revised checklist was issued with the circular of 19.04.2007, which included an indication that all categories of animals on a large intensive pig unit needed to be checked. Further written procedures were provided to seven Prefectures at the coordination meeting on 2.05.2007. In particular more detailed guidelines were issued for requirements such as measuring laying hen cages and the justification for tail docking in relation to pigs.

Regarding the format provided for recording inspections, it was noted that this did not indicate that certain basic information should be entered such as the name and address or identification of the farm and the date of inspection. As a result this information was missing from completed checklists.

Regarding the laying hen farm visited in Larissa which had unenriched cages the mission team noted that:

- Although the checklist indicates that the capacity of individual cages should be assessed it does not indicate that to assess potential overstocking it is necessary to calculate the maximum number of birds for each building and compare this with the number of birds in place. The Prefecture CA stated that the maximum capacity of each farm has been checked once and is permanently allocated. The OV therefore did not take into account that one complete row of cages, which accommodated 2000 hens, had been removed prior to an inspection in August 2006 and the maximum capacity was not updated, as required by Article 1.4 of Directive 2002/4/EC.
- The farmer was not aware that a period of uninterrupted darkness of about eight hours is required and although at a previous inspection the OV had recorded that the length of this period was four hours he had not taken any action on this issue. The OV was unaware that a claw shortening device was not in place, contrary to Article 5.1(6) of Directive 99/74/EC, and had considered the non waste deflection plate to meet this requirement, which it did not.
- In response to a recommendation in Report 1133/2000 the CCA indicated that guidance was being prepared to deal with the issues highlighted in this report, which included measurements and calculation of the slope of cage floors. A guideline had been provided at the coordination meeting of 2.05.2007, some

seven years after mission 1133/2000. During the visit, the OV had difficulties in adopting the given method to detect that the slope of the cage was 18% and that the height of the cage was insufficient. Article 5.1(5) of Directive 99/74/EC requires that the slope should not exceed 14% and Article 5.1. (4) that the height of the cage must be more than 40 cm over 65% of the area. These were also EU requirements in the previous legislation (Directive 88/166/EEC⁹), which were in force since 1 January 1995.

Regarding inspections of alternative farm systems, the CCA had indicated in its instruction of July 2003 that the more detailed requirements, which were applicable on new farms from 1.1.2003, would be applicable to all alternative farms from 1.1.2007. However there was no subsequent instruction on how to assess these requirements for nesting, perching, drinking and feeding, and when farms had been inspected just prior to 2007 these issues had not been checked and it had not been pointed out to farmers that these requirements needed to be met from 1.1.2007. On the farm visited in West Attica the OV detected that there were twice as many birds on the farm as should have been allowed, as sufficient perching space was not provided contrary to Article 4.1.1(d) of Directive 99/74/EC.

Regarding pigs, in the instructions of 16.07.2003 and 19.04.2007 the CCA asked the Prefectural CAs to advise farmers to take measures to ensure that farms comply with the requirement for sows and gilts to be kept in groups in holdings built or rebuilt after 01.01.2003 as required by points 4(a) and 9 of Article 3 of Directive 91/630/EEC. However, the mission team noted that:

- The checklist used for inspecting farms between January 2003 and April 2007 did not include the requirement for sows to be kept in groups.
- The checklist from 28.03.2002 simply indicated to check manipulable material, but did not indicate for what categories of pigs and the revised checklist from 23.04.2007 indicated to check for manipulable material in the farrowing area. The OVs indicated that such materials, which were absent on both farms visited, need only be provided in the case of fighting; point 4 of Chapter I of the Annex to Directive 91/630/EEC indicates that this should be provided for all categories of pigs, not just in the case of aggression between pigs.
- The OV in West Attica checked both medical and mortality records and detected that mortality records were incomplete. The OV in Larissa did not check whether these records were kept. The medical records on the two pig farms were incomplete, withdrawal periods were not always indicated, as required by Article 10 of Directive 96/23/EC¹⁰, and in Larissa only five entries were made in three years and no entries since October 2006. The farmer indicated that he had more records which were currently not available.

⁹ Council Directive 88/166/EEC of 7 March 1988 complying with the judgement of the Court of Justice in case C 131/86 (annulment of Council Directive 86/113/EEC of 25 March 1986) laying down minimum standards for the protection of laying hens kept in battery cages, OJ L 74, 19.03.1988, p. 83.

¹⁰ Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products, and repealing Directives 85/358 /EEC and 86/469/ EEC and Decisions 89/187/EEC and 91/664/EEC, OJ L 125, 23.05.1996, p. 10, (hereafter: Directive 96/23/EC).

- Regarding stocking density, the OVs took measurements and correctly concluded that the pens for most categories of pigs provided a sufficient space allowance. However, in Larissa the OV did not note that the unobstructed floor area of the boar pen was insufficient, as it was also used for natural service, (Chapter II.A of the Annex to Directive 91/630/EEC). Although indicated in the time-table for application of requirements in the CCA instruction of 19.04.2007, neither the old or new checklists included this point.

Follow up actions

Checklists include a section for non-compliances and subsequent actions, such as written recommendations, administrative fine or criminal sanction. Another section is for comments and recommendations regarding the amount of time to be allowed before a fine or criminal sanction could be imposed. The mission team noted that:

- From the documents checked in the Prefectures visited, in case of non-compliances the section concerning "non-compliance and sanctions" was not completed and that the section "comments and recommendations" was mostly not completed and follow up visits were not planned. In West Attica after the inspection of the farms visited the OVs gave deadlines, such as two months to fix the deficiency concerning the perches; however, in Larissa the OVs did not give deadlines for the identified deficiencies.
- Non-compliances detected during previous checks, such as the poor condition of the roof, inadequate ventilation and the lack of an alarm system in case of a breakdown of the artificial ventilation on the pig farm in Larissa, had not been corrected, contrary to Article 54(1) of Regulation (EC) No 882/2004.
- No cases where sanctions had been applied were provided to the inspection team.

5.6. Reporting

In response to a recommendation in Report 8522/2002 the CCA indicated that completed checklists were used to compile their contribution to the report required by Decision 2000/50/EC. The mission team noted that:

- From the results of inspections in 2005 which have been reported to the CCA, no inspections had been carried out in 40% of Prefectures, 30% had carried out inspections but no deficiencies had been detected and 28% had carried out inspections with deficiencies detected (there were no farms in 2% of Prefectures). The CCA did not have a complete picture of the checks carried out in 2006.
- The results which have been reported were not reliable in Larissa as the report sent to the CCA for animal welfare inspection of laying hen farms of 2005 was a photocopy of the previous year, the only difference was the number of farms and the year recorded on the first page. A Prefecture official indicated that this was done as no changes had taken place from one year to another.
- Discrepancies were noted between the number of checks of laying hen farms reported and the documentation of checks kept in the prefecture, as in West Attica the number of checks reported were 40 in 2005 and 8 in 2006, whereas the files kept indicated 10 and 47 checks respectively.

- In West Attica several deficiencies such as lack of back up equipment in case of failure of the ventilation equipment were recorded in 2006 in the checklists, but had not been notified to the farmer in the comments provided for at the end of the report or reported to the other levels of the CA. The Directors of both Prefectures indicated that the reason for incomplete and inaccurate records and reports was due to lack of staff.
- The CCA is responsible for collating the reports on animal welfare checks from the Prefectures and submitting a national report to the Commission in accordance with Decision 2000/50/EC; however, the report of inspections carried out in years 2004-2005 have not yet been sent to the Commission.

6. CONCLUSIONS

- (1) There has been an inadequate response to a recommendation in Report 8522/2002 to ensure that adequate staff are in place at all levels of the CA. Although the number of staff dealing with animal welfare at central level has increased by one, this has not had a significant impact on the effectiveness of the checks carried out. There continues to be a chronic problem in attributing adequate staff to the Prefectural CAs, which undermines the implementation of a control system for animal welfare on farms, contrary to Article 26 of Regulation (EC) No 882/2004.
- (2) The CCA's undertaking to provide training to officials carrying out checks, which was given following a recommendation in Report 8522/2002, has not been fulfilled. This lack of training, contrary to Article 6 of Regulation (EC) No 882/2004, contributed to the lack of knowledge of EU requirements and to the failure to identify deficiencies such as inadequate cages and the lack of manipulable material for all categories of pigs, both of which were not sufficiently checked at the time of the previous mission.
- (3) The performance of the local inspectors has not been monitored effectively and as the other levels of the CA were not aware that inaccurate results of inspections have been reported, measures taken to verify the effectiveness of inspections have been insufficient at local level and lacking at Central level, contrary to Article 8 (3) (a) of Regulation (EC) No 882/2004. Although internal audits, as required by Article 4 (6) of Regulation (EC) No 882/2004, have not been carried for animal welfare controls on farms, the CCA are considering this for the near future.
- (4) The necessary amendments have been introduced into national legislation in response to a recommendation in Report 8522/2002 in order to make fines for many of the common deficiencies more dissuasive.
- (5) Insufficient arrangements have been made to provide training courses for pig stockpersons, contrary to Article 5a of Directive 91/630/EEC.
- (6) Progress with the registration of laying hen farms, which should have been completed by 1 June 2003 (Article 1 of Directive 2002/4/EC), has been slow and incomplete with many errors in the data recorded. As certain establishments have been operating without being registered, these operators had not been given a code to be marked on the eggs, as required by Article 8.2 of Regulation (EC) No 2295/2003. It is concluded that eggs placed on the market are not always being appropriately marked as, in addition to the failure to complete the registration of

holdings and allocate the necessary codes, in one case the code for a barn system had been given to a cage production system and in another eggs bore an illegible mark.

- (7) The approach to inspections, as required by Article 3.1(a) of Regulation (EC) No 882/2004, does take into account certain risk factors, but a comprehensive assessment of the risks that influence animal welfare has not yet been made. The frequency set by the CCA of inspection of selected farms four times in one year was not appropriate and as result was not carried out by the Prefectural CA.
- (8) Although certain procedures had been documented, as required by Article 8.1 of Regulation (EC) No 882/2004, so that standard checklists were used for inspections, these had been insufficient to facilitate inspectors in making assessments of certain requirements such as the slope of cages for laying hens. Although this issue had been the subject of recommendations in previous FVO reports, CCA guidance was only provided one week before the mission and as a result there are cages in use which do not meet EU requirements.
- (9) Similarly in the pig sector, documented procedures did provide a basic framework for checks; however, as the checklist used for inspecting farms up to April 2007 did not adequately reflect requirements for group housing of sows (points 4(a) and 9 of Article 3 of Directive 91/630/EEC) this provision has not been adequately assessed. Guidance on the provision of manipulable material for all categories of pigs, as required by point 4 of Chapter I of the Annex to Directive 91/630/EEC, is still inadequate.
- (10) Although an appropriate system for remedial actions exists, farmers were generally not notified of the need for corrective actions and measures were not sufficient to ensure that deficiencies were remedied, contrary to Article 54 of Regulation (EC) No 882/2004.
- (11) Since a high proportion of prefectures have not reported carrying out any inspections in recent years, the CCA has not ensured that inspections have been carried out as required by Article 7 of Directive 91/630/EEC and Article 8 of Directive 99/74/EC. Among those prefectures which did carry out inspections, as a significant proportion detected no deficiencies, whereas deficiencies were detected on all farms visited during the mission, the controls carried out have been unreliable.
- (12) Reports from the prefectures visited did not accurately reflect the inspections that had been carried out and the CA have not ensured that the reporting requirements of Commission Decision 2000/50/EC have been met, as recommended in Report 8522/2002.

6.1. Overall conclusion

Although measures have been taken to set-up a control system for welfare on farms, many of the steps taken have been long after the EU requirements came into force and for certain procedures in anticipation of an FVO inspection. The actions, apart from one legislative change, which had been taken by the CCA following a previous FVO inspection five years earlier were either inadequate or so recent that they were not yet implemented by the other levels of the CA. The lack of involvement of a high proportion of Prefectures in carrying out checks and the chronic staffing problem further undermine

the ability of the CCA to ensure that EU requirements for animal welfare are being respected. The quality of inspections has generally not been sufficient and the results which have been reported are unreliable. Insufficient measures have been put in place by the CCA to first identify and then to remedy these issues.

7. CLOSING MEETING

A closing meeting was held on 11 May 2007 with representatives of the CCA. At this meeting, the main findings of the mission were presented by the FVO team and the representatives of the CCA provisionally accepted these findings.

8. RECOMMENDATIONS

Within 25 working days of receipt of the report, the Competent Authorities are requested to present a plan of actions, including a timetable for their completion, to address the following recommendations. The CCA should take measures to ensure that:

- (1) The necessary staff are provided, as required by Article 26 of Regulation (EC) No 882/2004, for official controls of animal welfare on farms.
- (2) The staff performing checks are appropriately trained, as required by Article 6 of Regulation (EC) No 882/2004.
- (3) Verification of the effectiveness of inspections, as required by Article 8.3 of Regulation (EC) No 882/2004, is carried out to ensure the quality and consistency of controls of animal welfare on farms.
- (4) Sufficient arrangements are made to provide training courses for pig stockpersons, as required by Article 5a of Directive 91/630/EEC.
- (5) All laying hen farms covered by the scope of Directive 99/74/EC are correctly registered and that the register is updated when there are changes to the data, as required by Article 1 of Directive 2002/4/EC, in particular the maximum capacity of the establishment.
- (6) Eggs placed on the market are appropriately marked, as required by Article 8.2 of Regulation (EC) No 2295/2003.
- (7) The risks that influence animal welfare on farm are identified and are taken into account when controls are carried out, as required by Article 3.1 of Regulation (EC) No 882/2004 and the frequency for inspection of selected farms is appropriate.
- (8) Appropriate documented procedures, as required by Article 8.1 of Regulation (EC) No 882/2004, are provided so that all the requirements of Directive 91/630/EEC and Directive 99/74/EC are adequately covered during inspections.
- (9) All laying hen farms which fall within the scope of Directive 99/74/EC meet the requirements of this Directive, in particular that the height and slope of cages meet the requirements of Article 5.1(4)(5) of Directive 99/74/EC.

- (10) All pig holdings built or rebuilt from 1.1.2003 provide group housing of sows, as required by points 4(a) and 9 of Article 3 of Directive 91/630/EEC.
- (11) When non-compliances are detected, appropriate actions are taken so that the operator remedies the situation, as required by Article 54 of Regulation (EC) No 882/2004.
- (12) In the whole territory the CA carries out inspections for checking compliance with the provisions of Article 7 of Directive 91/630/EEC and as by Article 8 of Directive 99/74/EC regarding laying hens.
- (13) Reports required by Decision 2000/50/EC accurately reflect the inspections carried out.

9. COMPETENT AUTHORITY RESPONSE TO THE RECOMMENDATIONS

Once the report has been published, the competent authority response to the recommendations can be found at the following link:

http://ec.europa.eu/food/fvo/ap/ap_greece_7244_2007.pdf