

**Commission services' response to the competent authority's comments on draft report DG (SANTE)/2017-6126–Spain– evaluate Member State activities to prevent tail-biting and avoid routine tail-docking of pigs**

**28 March 2018**

Reference in draft report		(Short description) Competent authority's comments	Commission services' comments	Action in response to competent authority's comments		
Page	Section			Not accepted	Accepted	
				Text amended	Footnote (no.)	
3	4 Background	The reference on the first line on page 3 is to “ <i>producción extensiva</i> ” [ <b>extensive production</b> ]. ANPROGAPOR wishes to make it clear that, in Spain, the concept of “extensive” is defined in specific legislation governing extensive production (Royal Decree 1221/2009). Pursuant to that measure, production may be considered extensive only when stocking density is fewer than 15 pigs per hectare (2.4 livestock units (LU) per hectare). According to ANPROGAPOR, “ <i>some 750,000 acorn-fed Iberian pigs (1.65% of the total) are produced under extensive conditions in Spain. In any discussion of free-range pigs, it is necessary to include pastured stock and those raised under the other systems with open-air enclosures, which could amount to more than 1.5 million pigs per annum (around 3.26% of production)</i> ”.	Footnote amended		(6-amended)	
3	4 Background	In the second paragraph on page 3, “post-weaning” is translated as “post-destete”, although the term used in pig production in Spain is “ <b>recría/transición</b> ”.	The comment will be passed onto the Commission's translation services for consideration in the final translated report.			
5	Finding 9	Finding 9 reads, “ <i>This document (“Document 2”) also requires the Autonomous Communities to collect information on the incidence of tail-docking</i> ”. Document 2 reflects a consensus for	Footnote added		(8)	

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		the purpose of harmonising the collection of information, but it does not impose any obligations on the competent authorities. It is a compilation of different aspects that may be taken into account to understand the situation on holdings.				
8	Finding 21	<p>Finding 21 reads, "<i>ANPROGAPOR intends to assess the availability and ease of use of various types of enrichment material for Spanish pig farming systems. They also intend to set up a working group on tail- biting for southern Spain</i>".</p> <p><b><u>Proposed amendment:</u></b></p> <p><i>"ANPROGAPOR intends to assess the availability and ease of use of various types of enrichment material for Spanish pig farming systems. It also intends to request that a working group on rural development be set up in southern Spain"</i>.</p>	Text amended as proposed			
9	Finding 24	<p>Finding 24 states that "<i>In a recent press article and in communication to their members, ANPROGAPOR stated that in the majority of holdings...</i>"</p> <p><b><u>Proposed amendment:</u></b></p> <p><i>"In a recent press article and in a communication to their members, ANPROGAPOR stated that, in a substantial number</i></p>	Text amended as proposed			

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		<i>of units ...</i>				
11	Finding 38	<p>AECOSAN considers it important to emphasise that the figure of 17.5 % of abscesses documented in 2016 on the basis of the Autonomous-Community post-mortem reporting system refers to the presence of abscesses on any part of the animal's body. This information system does not detail where abscess are located, and it may therefore by no means be concluded that they are located in the caudal part.</p> <p>CA proposes to insert “<i>This percentage refers to the presence of abscesses on any part of the carcass. It does not relate solely to abscesses in the caudal part of the carcass.</i>” after the sentence ending “... 17.5% of lesions reported in 2016” and before the one beginning “Data on lesions linked to tail-biting ...”</p>	Text amended as proposed			
n/a	n/a	Throughout the report the English word “condemnations” is translated as “condenas”. CA believes that the correct translation should be “ <b>decomiso</b> ”.	<i>The comment will be passed onto the Commission's translation services for consideration in the final translated report.</i>			
15	Conclusion	AECOSAN would make the point that, bearing in mind the	The wording of Conclusion 55 has			

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	55	<p>wording of recommendation No 5, it considers it necessary to make it clear in this conclusion on official controls that, in accordance with the animal welfare control plan, the central-government official veterinary service (SVOE) informs the competent authority of the presence of serious or very serious lesions so that the latter can take the corresponding steps on every farm. The CA is therefore sent the information necessary for it to intervene. This should be considered alongside the fact that the competent authorities use the information from the findings of all available ante- and post-mortem inspections to measure progress with efforts to reduce the occurrence of tail-biting.</p> <p><b><u>Proposed amendment:</u></b></p> <p><i>“The authorities may have access to the information on serious or very serious shortcomings detected by the official veterinary services in slaughterhouses. In light of such information, each competent authority should take the corresponding steps on the farm concerned. Nonetheless, the authorities do not use... “</i></p>	<p>been amended as proposed. Nonetheless, the audit team does not agree with the statement that <i>"competent authorities use the information from the findings of all available ante- and post-mortem inspections to measure progress with efforts to reduce the occurrence of tail-biting."</i> The audit team did not receive any evidence of this CA activity before or during the audit.</p>			
		<p>There appears to be discrepancies between the conclusions mentioned in the recommendations and those to which the</p>	Text amended			

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		recommendations should refer, e.g. Recommendation 1 refers to conclusion 51 although there is no such conclusion, but there is a Finding 51 (which refers to aspects of slaughterhouses and appears to be linked to Recommendation 5).				
17	Rec. No 5	Recommendation No 5 refers to findings 47, 49 and 50. <b><u>Proposed amendment:</u></b> Conclusion 55. Results 47, 49 and 50	Text amended			