

ANNEX

ADVISORY RECOMMENDATIONS FROM "TAILS" EXPERTS TO COMPETENT AUTHORITIES AND PIG SECTOR

for the pig sector

1. Pig's point of view

- a) Remember that animals with intact tails do not suffer from the docking procedure or from phantom pain. All animals suffer when their tails are docked. Animals with entire tails only suffer when bitten; they can be treated with painkillers if necessary. When starting the rearing of pigs with entire tails, allow for higher biting figures initially.
- b) A farmer with pigs that are tail-docked very short may decide to move directly to undocked pigs. If this gives rise to tail biting problems, the farmer should use the two-step procedure (the first step should be to leave at least half of the tail) and not go back to very short docked tails. Continuous efforts should be made to move towards keeping pigs with intact tails;
- c) Consider that if current housing and husbandry systems in your country do not allow for the keeping of pigs with intact tails without risking major tail biting outbreaks, this means that all pigs reared in these systems experience significant amounts of stress, which seriously compromises their welfare. Therefore, to ensure the welfare of the pigs significant improvements to management are crucial, and serious consideration must be given to changes in housing and husbandry systems in the longer term. These improvements enhance both growth and health, and will thus create a return on investments;
- d) Straw is considered one of the best enrichment materials. It is possible to keep pigs with intact tails even with partly slatted floors and slurry systems that can only cope with small amounts of straw. In such systems hay or straw or similar can be provided in racks with a container underneath. Alternatively, the straw or hay can be chopped into small pieces (max 5 cm). A machine to chop the straw is on the market, but in fully slatted systems hay/straw racks are much better;
- e) It is possible to have pigs with intact tails with the Directive space requirements. However, extra space may be needed after weaning and after they are moved again to another location:
 - After weaning you should give them extra attention and make sure the feeding is changed as smoothly and gently as possible to avoid digestive problems and diarrhoea;
 - The mixing of litters should be avoided, with a maximum of three litters together, as pigs will fight if they are introduced to a new group of animals;
- f) An intact tail is the best indicator of the pig's well-being. It is easily observed, and it is very sensitive, it will tell immediately when a pig is in distress. A non-curved tail is an indication of

stress; docked pigs will start showing signs of stress later than pigs with intact tails.

2. Management

- a) It is important to provide farmers and farm staff with guidelines on early indicators of an outbreak of tail-biting. Such early indicators include changes in general behaviour, such as activity of the pigs in a pen, changes in feeding and drinking patterns, and especially, cases of hanging tails or tails tucked between the legs. As an intact tail is the best indicator to detect problems in the herd, the best way to prevent tail biting is by intervening immediately when tails are not curled. A quick intervention to understand and rectify the problem at this stage is necessary to prevent the onset of tail biting. Should you miss the early signs and tail biting occurs:
- Removing the biter may be one way to stop tail biting in a pen; however, in some cases it may be enough to give a proper amount of novel and attractive enrichment material. If removed, a biter should not be put in pens with larger animals due to the risk of it being attacked leading to poor welfare. Practical experience has shown that it may be possible to keep biters together without problems;
 - Give the remaining pen mates new manipulable material which they have not used before: chewable items and fresh grass are especially good if diarrhoea is the cause of the tail biting;
 - If tails are severely damaged, move the animals to a sick pen where they can heal properly;
 - Investigate what may have caused the stress. There may be some factors that have a negative effect on productivity in your herd, these factors may also affect groups not showing signs of tail biting as not all pigs react to stress by biting tails;
 - A group that has experienced tail-biting is likely to start again, therefore prevention immediately post-weaning is very important;
 - It takes several interventions to decrease the risk of tail-biting in pigs with intact tails to the levels reached with docked pigs, do not focus on silver bullets (easy solutions);
- b) Start rearing pigs with intact tails on farms rearing replacement gilts and boars used for breeding. This will enable the pig sector to gather experiences with the rearing of pigs with intact tails, whilst avoiding the problem with the trade in 30 kg undocked weaner pigs sold for further fattening in other Members States;
- c) Trials on raising long-tailed pigs are to be recommended; however, it is of the utmost importance that these trials are well-designed. Instead of focusing on improving single risk factors, this includes holistic assessments of risk factors, farm-specific plans for improvements (which are developed further if needed to achieve good results), and proper evaluation of success at different stages of the trials.
- Economic evaluations should be carried out to provide information to farmers or companies on how the gradual change of the production system from routine tail docking towards rearing pigs with intact tails will affect the business;
 - Financial evaluations should be done by an objective assessor, preferably by a university or an academic institute, to avoid bias. It should be kept in mind that there are also benefits to better management of a pig farm and better health status of animals, not only costs, and that these benefits might only become apparent in the long-term;
- d) It is important that farmers use the technical knowledge available in your country and in other EU countries and start looking for risk factors on their own farms. To assist the farmers, the

advisory system should be strengthened and advisors (e.g. veterinarians and consultants) should focus on the risks of tail biting;

- As many veterinarians have only worked in pig farms with tail-docked pigs, attention should be given to the need to update the pig veterinarians' skills and knowledge of preventive measures and of risk factors for tail biting. Intervention procedures in case of tail-biting outbreaks should be included in the herd health plan of the farm and farm veterinarians should be able to advise on that;
- e) Training of staff in pig farms is important to move away from the old procedures and to improve the management of pigs. Inform them that the behaviour of pigs with intact tails differs from those with docked tails. Teach them to read the early signs of poor health, stress and tail biting, and to check all the critical points every day. Teach them to see the tail as an indicator of stress. It should also be kept in mind that staff might speak other languages than your country official. It is therefore recommended that fact sheets or guidelines are translated if needed;
- f) If not already in place create networks of farmers, possibly including their veterinarians, to share information and experiences with regard to the rearing of pigs with intact tails. This would enable the sharing of experience on how to improve farm and management conditions, and on how to handle pigs with intact tails. Ideally, this should include farmers from other Member States, where necessary;
- g) Increase cooperation with the pig sector in other Member States to share knowledge and information on the rearing of pigs with intact tails and to find solutions to exchange the required written evidence of the need to tail-dock between farms across borders (this should also include pig traders);
- h) Keep in mind that rearing pigs with intact tails requires changes in management. All new premises should be designed for pigs with intact tails. Review the information available in your country and in the EU on how to do this successfully. A number of actions can also be taken in older barns:
- rubber mats can be added to fully slatted houses to provide a solid lying area and to prevent draughts and humidity for pigs of less than 40 kg;
 - the number of feeding places can be increased if necessary;
 - plastic slats should be avoided as they create more noise, thereby adding to stress levels;
- i) Pay close attention to humidity in pig houses as it has been proven to cause the animals stress and can trigger tail biting. Good management of ventilation and/or air conditioning is essential when rearing pigs with intact tails;
- j) Temperatures above a pig's comfort zone are a risk factor for tail biting. Therefore, measures should be taken to reduce this risk. One possibility is to install a misting system or something similar to help pigs regulate their body temperature. The system could be installed over the dunging area, as this may help to keep the lying area clean. The system should be operated, preferably automatically, at appropriate intervals. The intervals and misting periods should be weighed against the ambient temperature and the capacity of the ventilation system to keep humidity at an acceptable level. The system can advantageously be installed in older existing buildings;
- k) Use enrichment materials wisely. Pigs are curious animals who like to explore things. Vary materials from one age group to another. Always keep something extra for sudden tail-biting

outbreaks.

- l) Tail-biting risk assessment tools developed by the pig sector should include criteria and measures that are based on best practice with regard to the rearing of pigs with intact tails;
- m) Avoid mixing groups of animals during transportation and try to solve the problem with for example vehicles with divisions to separate animals.

3. Consumer's expectations and market

- a) In intra-EU trade it is important to create an intact tail pig market in order to reduce the risk of losing the market of live animals all together. This being one of the biggest challenges for the pig sector, initiatives by Member states should be encouraged;
- b) Bearing in mind the levels of market recognition and penetration, the label systems for pig meat could be excellent tools to introduce meat from undocked pigs in your country and on to the EU market. If premiums are agreed with retailers and adjusted accordingly, it would provide a massive economic incentive to a proportion of pig farmers to make the transition to rearing animals with intact tails. In general the domestic market share of labeling is less challenging than the market in other EU-countries. Promotional campaigns could be placed in other EU-markets as well;
- c) It is also important to raise the level of awareness of the differences in pig production, compared with for example the USA, Brazil and China. Benchmarking could be one way of getting more money from the EU market. Surveys have shown that the better welfare status of pigs reared under EU standards is not commonly known, and that people need to be informed as to why it is necessary to pay more for the meat from animals raised with intact tails

for Competent Authorities

4. Funding

- a) Member states and regions are encouraged to apply for funding of farm advisory services from the EU Rural Development Programme (Pillar II), which is co-financed by EU funds and regional, national and local funds, for example: for the training of pig farm staff, veterinarians and consultants;
- b) Funding from the EU Rural Development Programme for animal welfare compensation as supporting measures for farmers is also a good and important tool for farmers to make management changes. It can be used to put measures in place to prevent tail biting which go beyond the legislation's requirements, e.g. by creating more space. Use this compensation wisely and only for transition, to avoid any possible risk of affecting market prices
- c) Use EU Rural Development Programme funding for investment in premises in which pigs can be reared with intact tails under more stress-free conditions. This includes e.g. decreased stocking density, a possibility for simultaneous feeding in the group, an increased percentage of solid floor, optimal cooling systems and manure systems that allow for the use of optimal enrichment materials such as straw;
- d) Do not fund investments which do not fulfil the criteria of the Directive.

- e) EU funding is also available for promotional campaigns focusing on animal welfare (raising pigs with entire tails) and could be utilised by your country pig sector, possibly jointly with other Member States pig sectors.

5. Enforcement

- a) Set clear compliance criteria for all relevant legal requirements based on animal-based indicators and resource-based indicators to assess compliance with minimum requirements. If necessary, to update the Action Plan to improve controls on the prevention of tail-biting and avoidance of tail docking (hereafter: the Action Plan), develop compliance criteria for all relevant requirements of Directives 98/58/EC and 2008/120/EC;
- compliance criteria in the action plan should be mandatory and this should be clearly agreed with the pig sector;
- b) The checklist to support official controls should be supplemented with a chapter on risk assessment. Detailed guidelines should be given on how inspectors should assess whether the different elements of the farmers risk assessment mirror the conditions on the farm, and whether the action plan will lead to improved conditions;
- c) It is recommended that inspectors can have access to equipment to measure gasses such as CO₂ and NH₃. To rely on subjective criteria such as eye irritation is a too coarse and unreliable indicator to assess whether there is a need to improve indoor climate;
- d) Set criteria in the Action Plan and ensure that farmers provide evidence of tail and ear lesions, perform risk assessments at regular intervals, and engage in a continuous process of improvement measures until they are able to keep pigs with intact tails. If certain improvement measures entail refurbishment and therefore are too expensive in the short term, other measures can be tried first. Farmers should be able to demonstrate a continuous effort to improve conditions on their farm;
- e) Ensure that criteria for farm risk assessment and improvement measures in farm action plans are based on best practice with regard to the rearing of pigs with intact tails. This means that farm improvement measures must be taken in addition to and/or going beyond the compliance criteria set by the Competent Authority to assess compliance with minimum legal requirements of Directives 2008/120/EC and 98/58/EC that are related to risk factors for tail biting.
- Whilst all pig farms (regardless if tails are docked or intact) have to comply with the legal requirements mentioned above, farms that continue to tail-dock / rear docked pigs must in addition demonstrate serious steps (“other measures”) to further improve conditions on their farms. Otherwise farmer risk assessments would just document (non-) compliance with minimum legal requirements;
 - the action plan for the farms should not only include timelines for the proposed improvement actions regarding risk factors, but also a plan, which aims at raising pigs with intact tails only. To this end the action plan should also include timelines for how and when the farm will gradually begin to raise pigs with intact tails;
- f) Elements in the risk assessment form should be described in detail, setting concrete thresholds whenever possible, based on good practices of rearing pigs with intact tails. Such examples include recommendations on feeding through space per animals of different ages, as well as

adding recommendations for the number of animals per drinker, water flow and proper functioning of water sources;

- g) Ensure that there is no reason for delay enforcement of the minimum requirement of Directive 2008/120/EC on tail docking. Update the Action Plan as necessary and set criteria for your inspectors to verify if farmers are actually carrying out risk assessments and taking improvement measures accordingly;
- h) Measures should be taken to ensure that only enrichment materials, which fulfil the pig's need for investigation, manipulation and rooting are used. The aim should always be that 100% of the pigs have access to enrichment materials as legally required;
- i) The aim of any guidelines on docking length should always clarify to dock as small a proportion of the tail as possible. The Council of Europe Recommendation concerning pigs Article 24 states that 'no more than half of the tail should be docked within the first 7 days of life';
- j) Concerning the setting of a threshold for tail biting for assessing in the farm when docking is no longer necessary, if for example a figure for tail biting of 2% is suggested, it is necessary to define what kind of lesions are calculated, i.e. how severe does a lesion have to be to be included? It is recommended that only score 2 lesions should be included here;
 - In addition, it is recommended to set different thresholds for intact and docked tails, as it is reasonable to assume that, at least initially, intact tails will have more lesions than docked tails. The threshold for intact-tailed pigs is suggested to be twice that for docked ones, i.e. 4% of score 2 lesions;
 - It is important to remember that measures should still be taken to reach as low a level of biting as possible;
- k) It is recommended that slaughterhouses should record tail-bites both at *ante mortem* and *post mortem* inspections. This should include a more precise recording of the seriousness of the tail bite. The findings should be recorded as a welfare indicator, and not hidden in "other finding". Tail biting lesions should be recorded independently of whether they cause a food safety risk or not. The meat inspector or the official veterinarians at the slaughterhouses should be given guidelines by the central authority on how this is correctly done. This is important as the pig farmer can use this information as a first step to benchmark the findings between batches and find out the more evident risk factors in his/her own farm. It should be ensured that the pig farmer is informed about the findings. The competent authority should also have access to the findings in order to be able to carry out targeted inspections on farms with a high level of tail biting;
- l) Where necessary, increase cooperation with other Member States to address the problems regarding the trade in 30 kg weaner pigs. Develop communication structures with Competent Authorities of other Member States to verify the evidence of the need for tail docking in farms where necessary;
- m) Work together with the pig sector to quickly develop minimum standards for a pig sector that is able to rear pigs with intact tails. The Competent Authority must have and actively take the lead in this as they are primarily responsible for ensuring that legal requirements are complied with.