



**FOLKETINGET  
STATSREVISORERNE**



**FOLKETINGET  
RIGSREVISIONEN**

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**Extract from Rigsrevisionen's report  
submitted to the Public Accounts Committee**

# **Inspections of pig welfare**

# 1. Introduction

## 1.1. Purpose and conclusion

1. This report concerns inspections of pig welfare. According to the Animal Welfare Act, all animals must be treated with care and in a responsible manner and protected as far as possible from pain, suffering, distress, permanent injury and significant disadvantage. Several reports from the Danish Veterinary, Food, Agriculture and Fisheries Agency (hereinafter FVST) show that there are problems complying with the law in Danish pig herds. Therefore, effective inspection is important.

2. According to figures from the agricultural sector itself from 2024, around 25% of all piglets die within a few days of birth. This corresponds to 10 million annually. In the early 1990s, piglet mortality was around 17% – according to figures from Aarhus University. Mortality has therefore increased. For sows, mortality was approximately 17% in 2024. It follows from Veterinary Agreement II that an unnaturally high mortality rate among pigs is a sign of poor welfare and poor conditions in pig housing.

In addition to the high mortality rate, FVST has stated in 2024 that 95% of pigs in herds have their tails docked. This occurs despite routine tail docking having been prohibited in the EU since 1993.

3. The Danish Parliament has continuously regulated and framed inspections of pig welfare through legislation and political agreements, most recently in the agreement Together for Animals from 2024. It states that the targets from the Pig Action Plan from 2014, which expired in 2020, have not been achieved in several areas. The parties to the agreement agree that the increase in mortality among piglets and sows must be reversed through the agreement.

Inspections of pig welfare are carried out by two agencies: FVST under the Ministry of Food, Agriculture and Fisheries and the Danish Agency for Green Land Reallocation and Aquatic Environment (hereinafter SGAV) under the Ministry of Green Transition. FVST is responsible for issuing rules on pig welfare and for ensuring compliance with these rules. SGAV checks whether recipients of EU agricultural subsidies comply with a number of EU requirements. As part of this, SGAV also inspects pig welfare.

Each agency is responsible for planning where and how inspections are to be carried out and how the responsible pig producers are to be sanctioned where relevant. However, their basis for inspection differs. FVST mainly conducts inspections based on requirements for pig welfare set out in Danish legislation, but the organisation of inspections follows EU rules. SGAV conducts inspections based on requirements for pig welfare set out in EU legislation on control of subsidy recipients. Here too, the organisation of inspections is determined by EU rules. There are minor differences in the requirements for pig welfare in the two sets of rules.

If infringements are identified, the pig producer must be sanctioned. FVST must follow up both on infringements it identifies itself and on those identified by SGAV. FVST and SGAV have therefore entered into a cooperation agreement to define the principles for the division of responsibilities between the agencies and to ensure coordination of inspections and follow-up.

4. The purpose of the study is to assess whether the two ministries' inspections of pig welfare are satisfactory. We answer the following questions in the report:

- Do the agencies have a satisfactory basis for selecting pig producers for inspection?
- Have the agencies prepared satisfactory guidance for carrying out inspections and imposing sanctions?
- Have the agencies imposed sanctions and applied the sanctioning options provided in the legislation?

Rigsrevisionen initiated the study in February 2025.

## Conclusion

**The Danish Veterinary, Food, Agriculture and Fisheries Agency's (FVST) organisation and execution of inspections of pig welfare are highly unsatisfactory, while those of the Danish Agency for Green Land Reallocation and Aquatic Environment (SGAV) are unsatisfactory. There are several ways to avoid inspections, and there are indications that FVST has not increased sanctions in cases of repeated infringements. The consequence is that poor animal welfare is not detected and sanctioned effectively.**

### **The agencies' basis for selecting pig producers for inspection is highly unsatisfactory**

FVST's organisation of inspections does not ensure that the highest-risk pig producers are selected. FVST carries out risk assessments of pig herds rather than pig producers when selecting for inspection. This is inappropriate because many producers have several herds. When a producer has several herds, the agency does not obtain an overall picture of the producer's ability to comply with the rules. FVST is currently examining whether its organisation of inspections may also conflict with EU rules.

SGAV's basis for selecting pig producers does not include all relevant producers. This is because some producers can avoid inspection by splitting their farming activities into several entities and registering pig herds under a CVR number that is not subject to inspection because no EU subsidies are applied for under that number. Rigsrevisionen has also seen examples of producers previously subject to subsidy reductions due to animal welfare issues disappearing from SGAV's inspection population. Rigsrevisionen drew the agency's attention in 2021 to the issue of circumventing inspections through artificial splitting of farms. Following dialogue with the EU, SGAV's inspections from 2026 will also include possible artificial splitting of farms carried out to avoid inspections of pig welfare.

### **FVST's guidance on inspections and sanctions is highly unsatisfactory, while SGAV's guidance is unsatisfactory**

FVST's inspection guidance has significant shortcomings. For example, there is no description at all of inspections of breeding methods, and the agency's rules and guidance on water spraying for cooling pigs have not reflected the intention of the legislation for 27 years. This means that inspections are not properly carried out and there is a risk that problems with poor animal welfare are not identified. SGAV's guidance largely mirrors FVST's and has the same shortcomings.

FVST has established a rule that allows pig producers to easily document the need for routine tail docking, even though this has been prohibited in the EU for 33 years. At the same time, FVST has instructed SGAV not to inspect compliance with all rules concerning tail docking. It is difficult to see how this practice can comply with EU rules.

Both agencies' guidance on sanctions lacks clear criteria for imposing sanctions. This means they do not have a solid basis for applying sanctions consistently.

FVST has stated that there is generally a need to update and specify guidance so that inspections can be carried out as correctly and effectively as possible.

**FVST's sanctioning practice is highly unsatisfactory, while SGAV's is unsatisfactory**

The agencies generally impose mild sanctions for infringements of pig welfare rules. FVST has provided guidance to producers in approximately 31% of cases. In around 65% of cases, it has issued injunctions, which are the mildest sanction. In about 4% of cases, it has reported matters to the police.

SGAV has issued warnings in around 22% of cases. In 74% of cases, it has reduced agricultural subsidies. In the remaining approximately 4%, it has reported producers to the police. In about 85% of cases involving subsidy reductions, SGAV has applied the lowest rates. A detailed review of individual cases would be required to assess whether stronger sanctions should have been applied.

However, SGAV has imposed sanctions that are too lenient in cases where producers have deliberately breached the rules. There are also indications that FVST has imposed sanctions that are too lenient by not increasing sanctions in cases of repeated infringements.

The rules require FVST to follow up when a sanction has been imposed. Our review of a number of cases shows that FVST did not follow up in around 9% of cases it identified itself. It also failed to follow up in around 32% of cases identified by SGAV. In addition, pig producers can avoid follow-up inspections and stricter sanctions for repeated infringements by changing their CVR number. FVST should follow up and ensure that such producers remain subject to inspection.

The study indicates that pig producers committing the same infringements are sanctioned differently by the two agencies.