

Copa and Cogeca's Feedback on the Roadmap - Inception Impact Assessment on EU Animal Welfare Legislation

Copa and Cogeca welcome the possibility to contribute to this consultation process.

We welcome the initiative to evaluate the impact of the Farm to Fork strategy and future legislation linked with it, including legislation for animal welfare. The EU animal farming and related sectors have made a strong commitment to increase animal welfare and we welcome science-based advice on where further improvements can be made.

A. Context, Problem definition and Subsidiarity Check

We note with some concern that this inception impact assessment comes at a time when the outcomes of the fitness check of the current rules remain unknown. On the one hand, the roadmap for the inception impact assessment confirms that the fitness check for the animal welfare legislation is still ongoing and only due to be completed in 2022. On the other hand, it highlights that available information already points to weaknesses in the design, implementation, compliance with and enforcement of the EU legislation.

Furthermore, the inception impact assessment addresses a number of legislative options but also indicates that they could be affected during the next steps of its development by certain pending results from the fitness check. This also applies to scientific reviews by EFSA on specific topics, which have yet to be completed. Furthermore, this inception impact assessment also touches upon animal welfare labelling, an issue that could also be affected by the Commission sustainability labelling initiative, which is planned for the end of 2023, and that is closely related to animal welfare given that animal welfare is supposed to be one of the sustainability labelling elements.

While we welcome the Commission's willingness to align the EU animal welfare legislation with the latest scientific evidence, it should also compensate farmers accordingly for their financial and performance efforts.

We recall that the objectives of EU legislation on animal welfare are to ensure the welfare of farmed animals through uniform application and enforcement of legislation.

Animal welfare requirements must also take into account the trade-offs between animal welfare and animal health. Indeed, new measures should be assessed to:

- a) see whether they are actually fit to improve the welfare of a given species; and
- b) ensure that any welfare benefit is not outweighed by a disproportionately negative impact on animal health.

The objectives of the revision, among others, are:

- to ensure a **higher level** of animal welfare;
- align the legislation with the **latest scientific evidence**;
- and make it **easier to enforce**.

We would therefore like to understand what forms the basis of the Commission's current understanding of the problem and possible solutions, and whether the Commission is satisfied with the data available at present and considers it to be sufficient to appropriately conduct an inception impact assessment on the matter.

From our organisations' perspectives and considering the arguments presented above, we would recommend that the Commission complete the whole fitness check exercise before taking any further steps with regard to an assessment of EU animal welfare legislation.

Moreover, the conditions on the use of the directives and their binding power should be tackled directly during the revision of the animal welfare legislation itself.

Finally, the Commission must:

- base new animal welfare initiatives strictly on independent scientific research;
- emphasise a fair trade policy, ensuring a level playing field, as a precondition for higher European standards, and;
- ensure a fair distribution of costs and benefits in the food chain and the role of the market in enabling farmers to become more sustainable.

B. Objectives and policy options

a. Transport

Copa and Cogeca welcome the initiative to review the current legislation on the transport of animals. We acknowledge the need for a revision and an update that can ensure harmonised enforcement of the legislation and we would like to put forward the following key principles for the current revision:

It is worth pointing out that the EU animal transport regulation already includes detailed provisions, which are, however, not always complied with. This leads to negative headlines and scandals in the media that give a highly negative image of EU livestock operators and their day-to-day work. We therefore advocate a full and harmonised implementation of Regulation 1/2005 and its revised versions in the future at national level in all Member States. Given the cases of non-compliance in particular, we also call on the EU to look for specific solutions to ensure full compliance with current legislation.

Space allowances, travel times and travel conditions

Animal transport is an essential element of a functioning internal market based on the division of labour. In this respect, uniform regulations that all countries adhere to are essential.

The quality of the environment in the vehicles for animal transport is hugely important for animal welfare. This includes factors like ventilation, temperature, ceiling height, the nature of the floor, space allowance, etc. Copa-Cogeca encourages the Commission to assess long-distance transport in a holistic manner, considering both the transport of animals for export and the intra-EU transport of animals.

Copa and Cogeca recommend that the Commission ask EFSA to look into science-based adjustments in this context as a way to improve the quality of long-distance transport, rather than focusing solely on reducing the length of the journey. Furthermore, we recommend always considering applicable criteria for space allowances in relation to the transportation duration or distance and with a solid scientific basis.

Live animal exports to non-EU countries

European standards are among the highest worldwide. These standards ensure a high level of animal welfare during transport. We acknowledge that doubts have been expressed as to whether these criteria are upheld for transportation bound for third countries. Future approaches should therefore comply with international initiatives. This guarantees a mutual understanding of animal welfare during transport among all stakeholders.

Copa and Cogeca would like to address the question of commercial transportation of animals for further fattening, breeding, etc. over long distances and, in particular, to third countries. Trade of high value breeding stock is crucial, both to ensure continued genetic improvement and to allow our world class genetics, developed within the EU, to be exported to countries all over the world.

Furthermore, breeding exports from the EU are the basis for building up efficient livestock sectors in third countries and make a significant contribution to the economic development of these countries.

The export of breeding animals from the EU also play a role in the development of sustainability worldwide and should be considered from a broader perspective. Breeding animals are in demand because of their good health status, productivity and longevity.

The export of breeding animals is often followed by exports of technologies, housing equipment, technologies to manage slurry, veterinary services to reduce the use of antimicrobials, and know-how. These are important factors that help to reduce the environmental impact of livestock production around the world.

Unweaned and other vulnerable animals

Long-distance travel for young animals is possible and can be in line with the current animal welfare discussion. However, we need clear communication to all parties on which criteria need to be met and the general understanding that animal transport cannot be prohibited if these criteria are met.

Both options can be problematic for many farmers in the EU, depending on the definition of “long journeys”. Veterinary inspection before and during loading are not feasible from a cost-effectiveness point of view in some cases and in some Member States where long distances to the farms and the countryside’s orography make it difficult to travel.

While Copa and Cogeca agree that animal transport must take into account species-specific veterinary advice to decide which animals are fit for transport, we insist that this advice always be based on the best available scientific knowledge for each species and given on a case-by-case basis. Scientific substantiation and more clarification is needed as to the reason behind the transport and which animals are involved. Recent scientific research has concluded that the travel distance does not pose the main threat to the welfare of the transported animals, but rather the management of the animals and the transport conditions as well as the transport vehicle itself.

Last but not least, we would be interested in knowing if “pregnant females” are also taken into consideration in this point and what we can expect from the Commission in this regard.

Better monitoring and enforcement by introducing new technologies and means of transports, adapted to new technologies

Nowadays, many new technical improvements, which improve quality, compliance and animal welfare during the journey¹, are available for different forms of transport. The new technologies should be used appropriately according to the situation. Copa and Cogeca encourage the Commission to take these new technical solutions into consideration in the current revision. This will allow the transport companies to demonstrate transparency and compliance with animal welfare provisions during transport and could also ease some of the administrative burden related to paperwork and other procedures. We believe that all transportation vehicles within the EU should be subject to the same, harmonised requirements.

On the other hand, if standards are upgraded and CCTV systems are implemented, we feel that the scope, benefits, and who may have access to and how they may access the data and images must be clarified.

¹ For instance, climate control systems (air conditioning) in new models of lorries approved for long-distance transport exceeding 24 hours; access to fleet control systems to allow authorities to track the lorry all the way to the destination (GPS, temperature logging, CO₂-monitoring); real-time camera monitoring of animals in the lorry for surveillance and control of the welfare and health status of the animals during the journey and during the unloading of animals upon arrival at the destination; electronic systems to manage journey logs, etc.

Aquaculture

The transport of fish cannot be compared to the transport of land animals due to their specific ethological characteristics and to different transport methods. Therefore, there cannot be a one-size-fits-all approach.

b. Animal welfare at farm level

Five domains

We believe that this point would require more clarification from the Commission.

The five domains model may have a justified approach and may provide important guidance to ensure animal welfare. However, for all animals, including farm animals, there are circumstances in which it is reasonable to temporarily reduce action in one or more of the domains.

It is important to ensure that all future legislative proposals on this or on any other agriculture-related issue have a robust scientific basis before any decision is taken at political level in the EU. We would therefore encourage the Commission to ask EFSA to conduct further research into the areas where scientific work still needs to be carried out before any recommendations on legislative proposals are delivered. Furthermore, we feel that more scientific knowledge and evidence must be put to use before we can adopt the Five Domains model (Mellor, 2017) instead of the Five Freedoms, which are “the guiding principles which inform the OIE’s work on the welfare of terrestrial animals”²

It should be pointed out that current practices, e.g. genetic selection or feed, have evolved considerably towards greater robustness, welfare and health. This also applies to housing, natural behaviour and mental stimulation. Moreover, certain interventions are necessary to prevent pain. Independent and scientific research should form the basis of further evolution, not revolution.

Duty-of-care

Firstly, we must remember that the animal welfare standards applied in the EU are among the highest worldwide.

Clarifying this concept of *duty-of-care* for farmers may be a good way of translating a common understanding into requirements and measures that are tailored to specific farm circumstances. On the other hand, the Commission must prevent this from resulting in unnecessary and burdensome red tape for farmers.

The Commission must identify the barriers to complying with existing legislation in terms of farmers’ economic situations, the lack of applied practical solutions, conflicting legislation, unclear legal aspects or other issues. There can be many different obstacles that make compliance with certain aspects difficult. Space is frequently mentioned as one of many risk factors. However, very often, environmental legislation is a barrier to the farmer providing more space for the pigs as it requires new investments and a new environmental permit.

Copa and Cogeca would therefore like to see a proposal from the Commission to develop a simplified EU legislation with more practical and targeted rules on animal welfare allowing for more flexibility for the farmers and with reduced administrative and production costs. We believe that this would improve animal welfare as it would allow for different solutions that are more suited to individual farms. Goal-oriented rules may also increase the farmers’ interest in making animal welfare improvements. An EU animal welfare legislation based on goal-oriented rules could help to promote positive development with good, innovative solutions for housing and management.

² “That the internationally recognised ‘five freedoms’ (freedom from hunger, thirst and malnutrition; freedom from fear and distress; freedom from physical and thermal discomfort; freedom from pain, injury and disease; and freedom to express normal patterns of behaviour) provide valuable guidance in animal welfare.” Terrestrial Animal Health Code, Chapter 7.1. “Introduction to the recommendations for animal welfare”. Article 7.1.2. Guiding principles for animal welfare, Point 2. (OIE, 2019, most recent update adopted).

Proper guidelines with recommendations could assist the farmers in complying with this goal-oriented legislation. The farming community has developed comprehensive guidelines on good practices to help farmers to enforce the current rules on farm as well as to increase production. Such guidelines should take into account the various different types of livestock systems.

We advocate a full and harmonised implementation of animal welfare legislation at Member State level. It must also be considered that some cases of non-compliance at Member State level may be related to specific geographical, political or climatic conditions of a given Member State or geographical region. In those cases, specific solutions may be sought in order to assure full compliance.

Ultimately, in all fields of action it is necessary not only to define goals, but also to find solutions. In addition to new scientific knowledge, the experience and know-how of the farmers must also be included here to ensure practicability and feasibility. We believe that a comprehensive and scientific approach is necessary in the evaluation as well as in the future work to improve the EU animal welfare legislation.

Finally, no distinction should be made in this regard between large and small farms.

A prohibition on cages/stalls

Given the current policy developments, it is crucial for us to take part in the current discussion about the use of cages provided that economic, environmental and social impacts are taken into account and fair trade is guaranteed. A sufficient transitional period must be secured for changes in production methods and investments to guarantee the financial viability of recent investments, but also to give farmers time to plan for their future. The length of the transitional period depends on the requirements of the species, the production method and the depreciation of existing buildings and their equipment. The economic preconditions for the livestock sectors must be fulfilled, both in terms of producer prices and necessary investment. Farmers need to be provided with stability and European policies must help them to plan in the long term. It must be acknowledged that billions of euros worth of investment have already been made and have not yet been fully paid off. Farmers would need to get additional support that goes beyond existing measures to be able to invest again. The differences between production sectors must be also taken into account on a scientific basis and using solid agronomic evidence, while maintaining production potential in the EU. All farmers and production systems must be given a chance to invest in sustainability and animal welfare but at the same time ensure that their production will remain economically and technically feasible.

On the other hand, we also need a clear definition of 'cage'. The 'End the Cage Age' Initiative covers many different production systems that are adapted to the needs of different species. We believe that not all of these can be defined as a 'cage'.

Increased animal welfare standards will affect EU farmers' production costs.

In addition, we believe that the EU must guarantee the reciprocity of standards between imports and products produced in Europe. This must also apply to imports destined for further processing. An EU policy with double standards will have a devastating impact. Additionally, consumers must be further educated and informed about the efforts and investments farmers have already made to guarantee the highest animal welfare standards in the world.

Furthermore, it is necessary to use housing systems appropriate to a particular stage of life and/or production stage. It is of the utmost importance that the farmer and/or the veterinarian is allowed to isolate single or grouped animals for animal welfare and animal health reasons, but also when substantial production losses need to be avoided. It would be desirable to take into account the experience of the farmers who look after the animals on a daily basis.

This could include, for example, those farmers using/doing the following:

- more individual monitoring of animals and working to avoid the risk of contamination/transfer of disease;
- quarantine to prevent animal diseases and to get to know the new environment and new groups;
- housing for sows and piglets in the farrowing phase;

- sows that are covered for the first time to avoid embryonic mortality;
- grouping in laying hens;
- individual feeding and monitoring of calves after weaning;
- practices for research purposes, e.g. pilot project farms;
- etc.

Requirements for livestock farming systems and increased space allowances

As European farmers, we can be proud of the fact that we have the highest animal welfare standards in the world. We are constantly investing in higher animal welfare standards that are within our capabilities and a market-based approach. EU farmers are interested in increasing our standards even further based on a scientific approach. To do so, we urge the Commission to ensure fair trade and competition with third countries and to educate the consumers about our standards. Only by doing this can we heighten animal welfare including space requirements and still provide farmers with a decent income and reimbursement. We would like to reiterate the point about compensating farmers accordingly for their financial and performance efforts as mentioned in the section on transport.

Imposing higher animal welfare standards when consumers are not interested in buying such products would not be sustainable in the long term and would lead to a further concentration of farming.

The level of animal welfare achieved on the farms is determined by the interplay between multiple factors, including space requirements. Purely focussing on space requirements without taking into account the other relevant influencing factors leads to specifications that cannot be implemented at farm level and ultimately prevents animal welfare from being optimised. We would like to campaign for a formula that is appropriately adapted to the sector.

We would be critical of the requirement that livestock should be mandatorily exposed to the outside environment. A stall with an open front or with an opening is currently deemed to be a prerequisite for a high level of animal welfare in the animal welfare discussions. We would like to point out that a high level of animal welfare must also be possible in a closed stable. This, therefore, may have to be further developed. This is particularly necessary because an open-front stall cannot be approved everywhere.

Allowing animals to roam outdoors or opening stables increases risks and trade-offs with other domains. In this regard, blindly advocating outdoor access is not consistent with the other policy areas and could give rise to the following problems:

- a. Sanitary risks and risk of zoonotic infections:
 - i. Poultry: avian influenza, Newcastle Disease, worms, blackhead, etc.
 - ii. Pigs: Aujeszky virus, ASF, trichinella, helminths, etc.
 - iii. Cows: Tuberculosis/IBR/BVD/viral respiratory diseases
- b. Other risks:
 - i. Predators: e.g. fox, birds of prey, wolf, etc.
- c. Trade-offs:
 - i. Environment, impact on the neighbourhood, odour, etc.
 - ii. Stress for the animals (see predators or weather conditions)
 - iii. Required surface area
 - iv. Feed conversion
 - v. Increased use of veterinary medicines, for example anthelmintics, etc.

Mutilations

Animals hurt each other as a result of their natural behaviour as they determine the pecking order, the hierarchy, etc. This is not only related to the environment. This necessitates interventions to protect the animals from each other and from themselves. A ban is therefore unfeasible and harmful. In recent years, there has been a strong focus on welfare and pain relief. Additional conditions must take into account the comfort of the animal, the feasibility for the farmer and the requirements of the market.

Option 1

- *“Tail docking”*: Raising pigs with intact tails is a complex, multifactorial issue. Despite extensive research on tail biting and examinations of risk factors across the EU, no single reliable solution to prevent tail biting has been developed yet. Pioneer farmers have made progress but reported increased cost of production as the main challenge. To take the development to the next level, we need support for the formation of pioneer farmer groups that help to develop feasible solutions for keeping pigs with intact tails. Availability of professional infrastructure as well as a reasonable transition period and sufficient and robust financial schemes and incentives would provide farmers with support they need to invest in raising pigs with intact tails in a feasible manner. Practicable solutions must first be found before restrictions are tightened.
- *“Castration of pigs”*: Research into boar taint detection in slaughterhouses must be accelerated. Farmers still need to have a choice and decide themselves on a method of castration or whether to rear entire males based on their production system and marketing possibilities. To ensure a level playing field within the EU, the same criteria must be met by all member states.
- *“Beak trimming”*: this is a practice that is used worldwide to prevent injurious pecking among laying hens but also other poultry species. Pecking can cause damage to feathers or skin which leads to lower feed efficiency, wounds, and higher mortality. An outbreak of pecking can even occur in a flock with trimmed beaks, but the damage and injuries are minimised.³ Getting rid of the beak trimming procedure could harm the general welfare of the animals and increase the possibility of aggressive behaviour. The reasons why pecking and cannibalism occur are multifactorial and can be related to heat stress, light, genetics of the flock, red mite, reduced quality of the feed components, or feed consistency. Due to internal or external issues, and although farmers work with their animals very carefully, some problems with pecking and cannibalism may occur. As soon as cannibalism starts, it is almost impossible to bring the flock back to normal. These welfare issues can be very problematic, as any outbreak can result in high aggressiveness/an increase number of attacks and mortality. European farmers are trying to move towards reduced beak trimming but are still facing many issues. We would like to ask for the Commission's support in finding the reasons behind the issues. The research should include testing different genetics and ways of management and breeding. Additionally, the European Commission should also promote the use of white eggs amongst consumers, as management of white egg layers is substantially easier, also when it comes to keeping birds with intact beaks. In the meantime, farmers will continue their work in providing solutions and trying to keep birds without intact beaks.

New species-specific animal welfare requirements

We reject this approach. For the animal husbandry areas that are not currently regulated by law, there are usually good guidelines and advice.

All farm animals in Europe should be kept in housing conditions according to their species-specific requirements and the production systems considered, plus the regional climatic and geographical conditions where the farms are located. It must be taken into account that in some cases, e.g. various breeding animals, keeping animals outside cages can have an impact on other aspects of the production and make it impossible from an animal welfare or/and economic perspective.

Imported products of animal origin

Copa and Cogeca believe it is important to continue to focus on international initiatives such as bilateral and multilateral negotiations and cooperation with the WTO, OIE and FAO, as there is still a lot of work to be done to ensure mutual understanding on animal welfare. There should be

³ Niekerk, T. (2017): Managing laying hen flocks with intact beaks. Burleigh Dodds Science, WUR.

reciprocity between imports and EU products. Imports must comply with all EU animal welfare requirements, not just those relating to housing (e.g. cages). If not, you are misleading consumers and producers. An EU/non-EU label could offer solutions to improve consumer recognition. Trade policy should be further developed bilaterally and multilaterally. Therefore, an agreement between the EU and the respective countries based on mutual respect needs to be reached. On the other hand, we consider it important to reinforce communication/training activities in third countries regarding EU welfare standards, as they are not recognised as an added value when we export our products outside Europe. We believe that opportunities exist for more market-oriented animal welfare.

Option 2 seems interesting and might not be against WTO rules, as it does not restrict imports but just requires labelling.

Fur animals

All forms of farming and animal production should have right to exist and evolve following a science-based approach and according to their sector's/species' specificities. The economic and social viability of operators must be taken into account and supported by ensuring the consistency with other policies, particularly the trade policy. In case of additional requirements (which would at least maintain the production) a transition period should be granted which is long enough to allow for depreciation of existing and new investments. The fur sector has already invested a lot to adapt to and go beyond the Council of Europe Recommendations for fur animals from 1999. The investments have been estimated at 1.152 bn EUR, which only refers to mink production (93% of European fur farming production) and does not include the labour cost necessary for the installation of cages. Additionally, farmers are constantly investing in enrichment materials.

Cages are a key element in the housing systems of fur farms and satisfy the biological needs of the animals (e.g. also providing territory free of competitors). They are also ideal in terms of disease control. It would be impossible to breed fur animals without cages, so their prohibition would result in the closure of around 2,000 farms across Europe and an estimated loss of 15,000 direct farm jobs. Moreover, not only direct jobs would be affected: it is estimated that every fur farmer creates one additional domestic job.⁴ Negative effects on employment would also cascade downstream in the supply chain, which in Europe accounts for up to 100,000 jobs.

In case of any changes, the production would be relocated to countries without any animal welfare goals. European farmers follow the highest standards and can spread best practices around the world. Consumers demand a responsible product, and European producers have the ability to deliver it. European producers are committed to good practices and have developed many recognised certification schemes for animal welfare (e.g. Saga/FIFUR, WelFur). WelFur is an animal welfare assessment programme developed by seven European universities and currently implemented in 98% of European mink, fox and finnraccoon farms.

The fur sector maintains rural communities and supports the local economy. It is mainly made up of family, small and medium-size business. Production has a high importance for some specific regions of certain Member States (e.g. Greece, Finland, Spain) and it is a significant employment provider in rural areas. Furthermore, European production offers the highest quality products and the demand for fur is very high and it is increasing on all markets.

Animal Welfare Indicators

The indications on this point remain slightly unclear. We often hear about the need to move towards the use of outcome-based welfare indicators. We also see the great effort the European Commission is making towards financing proper research into such matters. As Copa-Cogeca, we can support the use of outcome-based welfare indicators provided that we have a transparent assessment that ensures that the right outcomes are chosen. Besides, we appreciate the idea of introducing animal-based indicators alongside resource- and management-based ones, to better reflect to real state of the welfare of the animals on a farm. They need to be developed in close cooperation with operators and be simple, practical and easy to implement, without incurring

⁴ European Mink Industry: socio-economic impact assessment. Hansen H.O. PhD, University of Copenhagen, 2017

additional administrative costs at farm level due to supplementary burdens. Flexibility is needed since we are dealing with live animals, and animal biology may differ from one case to another.

More precise terminology, definitions and requirements

The EU animal welfare legislation is becoming so complex that it is sometimes difficult to have a common interpretation at MS level, even for experts. This situation results in ineffective legislation and makes it hard to improve animal welfare in a practical and efficient way. Regarding this specific issue, Copa-Cogeca welcomes the setting up of the European network of reference centres in order to improve the way in which existing knowledge on animal welfare is coordinated, shared, disseminated and finally implemented across EU Member States. We need more information to add to our farmers' and operators' expertise.

The involvement of farmers in such a network is a crucial. Copa-Cogeca also welcomes the Commission's proposal to develop a simpler EU legislative framework on animal welfare, but only if it really does represent a step towards simplifying existing legislation, giving more flexibility to operators and reducing administrative costs at farm level. We think that practical experience should be part of the analysis.

The aquaculture sector is suffering from a lack of European reference centres for welfare for aquaculture, such as those used in the agricultural sectors. Fish are diverse, we cannot treat all fish in the same way. A trout is different from a carp or from a salmon. There are fish that live in fresh water and others in marine water, some of them are carnivorous and others herbivorous. Consequently, we should rather be talking about "trout welfare", "salmon welfare" and "carp welfare".

Competence of animal handlers

It is important that the additional offers for training are practicable and appropriately designed and that they can be selected in a targeted manner.

c. Animal welfare at the time of killing

As regards animal welfare during slaughtering, it is worth noting that animal welfare prior to slaughtering depends greatly on how the animals are handled by slaughterhouse staff. The focus should be on improving the staff's specialised qualifications, but also conducting appropriate checks on staff in the slaughterhouses (e.g. competent authorities, official veterinary checks) and enforcement of penalties as stipulated in the legislation in cases of violations (e.g. maltreating or mishandling animals). Besides, all slaughterhouses must comply with the same rules and should be controlled on the basis of equal standards. Animal welfare requirements should be applicable throughout the entire network of slaughterhouses in the EU, with no exceptions. Otherwise, there will be market discrepancies and disadvantages among Member States.

Moreover, any measures to ban current slaughtering systems for animals should be subject to more in-depth evaluation before being implemented. The evaluation should take into consideration robust scientific evidence provided by EFSA about both reducing animal suffering and available, feasible alternatives. It should also look into the potential economic impact and an adequate transitional period.

d. Animal welfare labelling

We welcome the comprehensive analysis that the EC's subgroup on animal welfare labelling has produced in the past year. We welcome the Commission's acknowledgment of the value of a voluntary system for the implementation of an animal welfare labelling scheme.

We also appreciate the Commission's invitation and its desire to involve all stakeholders and levels of production in the decision-making process for the future EU animal welfare labelling system. We thank the Commission for recognising the need for a system with the flexibility to allow co-existence between the European labelling scheme and existing national schemes.

However, we continue to insist on two fundamental points that the Commission should always keep in mind:

- The future labelling system must be based on objective measures and not subjective or emotional ones. These objective measures must be based on scientific and agronomic evidence, measurable and easily applicable for the whole agri-food chain.
- EU producers apply some of the highest animal production standards worldwide, regarding not only animal welfare. In some Member States farmers even go beyond legislative requirements. This should be adequately valorised through the future labelling system as part of a strong and robust regulatory framework, and highlighted in the context of international trade.

The label should not only be limited to fresh products but also include processed products and visibility on a restaurant level. Furthermore, the label needs to provide information about the living conditions of the animals throughout the whole cycle.

The administrative and economic burden must not be borne solely by the farmer but shared across the food-value chain. There must also be a control process throughout the chain, including slaughterhouses and means of transport.

The measures to be taken must be based on scientific findings and must therefore represent an added value for the animal. Moreover, a labelling system should not focus on a single animal welfare factor such as the presence or absence of cages. A single indicator is not per se representative of the level of welfare of farm animals.

The implementation must be equal between Member States, thus ensuring that it is equivalent and exchangeable between them.

Last but not least, a labelling system should be an educational tool for consumers, because consumers' knowledge of animal welfare seems to be based on expectations rather than the reality of farming systems.

C. Preliminary Assessment of Expected Impacts

For Copa and Cogeca, all sectors and forms of animal production have a right to exist, in particular if improvements in sustainability can be demonstrated (leaving no one behind). Furthermore, there is a need for a science-based approach where sector/species specifics are considered. The economic and social viability of operators, in particular producers, must be taken into account and consistency with other policies must be ensured, which concerns trade in particular.

Likely economic impact

The current standards and the requirements for food safety and quality are already high in the EU. The added value that higher animal welfare standards can generate for farmers is small and will not offset the extra production costs. Due to the high level of expertise, the efforts in recent years and the high cost prices in animal husbandry, the aim has long been to achieve optimal productivity and cost efficiency while using as little veterinary medicine as possible. Here too, the yield will be small.

The primary producer, as the weakest link in the chain, usually bears the costs and that is not acceptable for us. The higher cost prices will reduce competitiveness with non-EU countries and stoke the downward spiral for the primary producer, and in the long run the higher cost price mean that the animal welfare behind the product sold will not increase.

Agriculture and horticulture work with patient capital and long-term investments. Each step forward requires a sufficiently long transition period and support. The principle of evolution and not revolution is the only realistic way of working in the sector

Regarding the creation of a “more level playing field”, we would insist that reciprocity on animal welfare standards must be ensured and encouraged when making and reviewing trade agreements with third countries. Animal origin products should only be allowed to enter the EU if it has been ascertained that the animals were housed and slaughtered in an equivalent manner to what is set in EU animal welfare legislative requirements.

In case of additional requirements (which must still allow the sector to exist), sufficiently long transition periods for producers must be ensured to enable return on investment and cost-effectiveness of the productions. It is essential for farmers to be able to recover their additional costs from the market. This requires consumers being aware of their responsibilities and being willing to pay for additional welfare measures that go beyond legislation, alongside efforts to rebalance the power in the food chain. We have to acknowledge in this regard that there is not much room for manoeuvre left for farmers when it comes to bearing additional costs. The share of the return on investment that the consumer should bear at the moment of purchasing animal origin products with higher animal welfare standards should be carefully considered. This is of vital importance for the producers in the EU.

We are in favour of fairer competition for the internal market. Nevertheless, the Commission should not only assess the effects on third country producers and consumers exposed to imported products under our EU standards. The financial impact should be evaluated in more detail for each measure/action and according transition periods should be considered. Moreover, it is equally important to assess “animal welfare leakage” effects and the exposure of EU farmers to an unfair competition in international trade scenarios.

Likely social impacts

The EU Commission has to acknowledge that there is a difference between citizens and consumers. Consumers and citizens make different choices, which makes policy inconsistent with the economic reality on the farm.

The Commission seems to expect that consumers are willing to pay more for welfare-friendly products if they are well-informed about animal welfare. However, Copa-Cogeca believes that, in reality, this is not always the case, and even if a premium is paid by some consumers, there is no clear evidence that the premium will be passed on to farmers. However, higher animal welfare goes hand in hand with higher production costs for farmers. Therefore, we think that further studies are required to evaluate whether consumers are willing to pay for higher animal welfare in a way that would compensate the extra production costs carried by farmers. In addition, a mechanism needs to be implemented to ensure that farmers get a fair share of the added value they create by implementing higher animal welfare standards.

Likely environmental impacts

Last but not least, farmers fear that in the long term increasing the level of animal welfare might have a negative impact on the emissions produced on their farms or other environmental goals. This needs to be taken into account, and farmers should not be punished in this regard. Furthermore, this development must be scientifically substantiated and properly investigated, so that existing trade-offs can be avoided.

Likely impacts on fundamental rights

Likely impacts on simplification and/or administrative burden

Already mentioned in previous points (*Section B*)

D. Evidence Base, Data collection and Better Regulation Instruments

Impact assessment

As the Farm to Fork Strategy will have significant economic, social or environmental impacts, it is imperative that the Commission carry out impact assessments before taking any political or regulatory decision, including about animal welfare. This will affect EU production.

Evidence base and data collection

The Farm to Fork strategy for sustainable food must take into account all three pillars of sustainability (economic, social and environmental), as this is the only way to recognise the contribution of livestock and production in rural areas to food and other agricultural goods. Animal production with good welfare conditions can provide long-term solutions.

However, the current discussions often neglect these social and economic aspects and forget to include the human factor of farmers' work. Any future strategy must follow a comprehensive agri-food chain approach and be based on independent science-based policy-making. This will support investment through predictability and consistency.

Maintaining agricultural incomes is one of the objectives of the EU and is enshrined in the EU Treaty. It must therefore be taken into account when considering further developments.

Every further step must be scientifically substantiated.

Consultation of citizens and stakeholders

We welcome the willingness of the Commission to consult citizens and stakeholders and we will be glad to help in this process as much as we can.
