

Our proposals for the

# Revision of Animal Welfare Legislation



# Introduction

The Farm to Fork Strategy brought a new vision for the future of the EU food system. This includes a necessary revision of the **outdated legislation on animal welfare that is no longer fit for purpose, fails to keep up with the latest science**, disregards the crucial behavioural and physiological needs of animals, and no longer meets the increasing expectations of EU citizens regarding the treatment of animals.

Inadequate legal protection leads to billions of animals suffering each year due to inappropriate care and management, long and exhausting transport journeys, and stressful and painful slaughter. Even more alarmingly, the EU imports products from countries with incomparably lower welfare standards, undermining its own efforts to promote animal welfare.

This position paper presents our key asks for the forthcoming revision. We would like to stress the need for **strong, science-based, and precise rules with quantifiable standards that are enforceable**, rectify the mistakes of the currently applicable legislation, close its loopholes and markedly improve the long-standing and unsuitable status quo. To ensure fair competition, all animal welfare standards need to apply to imported products as well.

Over recent years, citizens have expressed their expectations of higher animal welfare standards in numerous surveys, polls, public consultations and European Citizens' Initiatives. These give the policymakers a clear signal that the EU legislation needs to be significantly improved and to do more to protect animals. We therefore hope that the proposed legislation will respond to their calls and reflect the vision of a more compassionate EU that citizens want to live in.

# Welfare of Animals on Farm



Despite possessing the most advanced system of on-farm welfare laws in the world, the EU still fails billions of animals. This is due to faulty designs of the directives, their vague and weak provisions and poor enforcement, which allow wide-scale use of painful practices that result in animal suffering.

## 1 Phase-out of cage farming by 2027

Hundreds of millions of animals across the EU are confined to cages which severely restrict their freedom of movement and freedom to express natural behaviours. This includes keeping laying hens in so-called 'enriched' cages, sows in sow stalls and farrowing crates, calves in individual pens and rabbits in barren cages. Almost 1.4 million people have voiced their concern over these cruel and inhumane practices and demanded that they be phased out across the whole EU for all species of animals kept for food production in the 'End the Cage Age' European Citizens' Initiative. We highlight the necessity to end the use of cages as soon as possible, that is by 2027. A longer transition period would only postpone the inevitable and prolong animal suffering.

## 2 Species-specific standards for all farmed animals, including fish

The current legislation provides species-specific standards for laying hens, chickens kept for meat, calves and pigs. However, the remaining species lack any tangible protection due to the very ambiguous and weak language of the General Farming Directive (98/58/EC). This makes it crucial that standards are adopted which reflect individual species' needs, based on the latest available science, and restrict selective breeding practices that result in poor animal welfare. The species that should be covered include dairy cows, rabbits, the most commonly farmed species of fish (salmon, trout, sea bass, sea bream, European eel, carp), turkeys, geese, ducks, quail, and parent stocks of laying hens and chickens kept for meat.

## 3 Ban on mutilations carried out routinely

Animals are routinely forced to undergo painful mutilations without pain-preventing anaesthetics or analgesics, such as tail-docking, teeth-clipping and castration in pigs, beak-trimming in laying hens and dehorning in cattle. These procedures are used to mitigate unwanted behaviours, which result from a lack of environmental enrichment, unsuitable group compositions or inappropriate management by farmers. Instead of using mutilation as a quick-fix solution, farmers should focus on the root of the problem and provide animals with an environment that reduces the incidence of aggression. The routine use of mutilation of animals should therefore be banned, with mutilation allowed only exceptionally on a case-by-case basis for justified health or welfare reasons. It should always be carried out only by a qualified veterinarian and involve the use of analgesics and anaesthetics to reduce suffering to a minimum. At the same time, it should become mandatory for farmers to provide sufficient environmental enrichment to allow animals to fulfil their behavioural needs.

## 4 Ban on force-feeding

Force-feeding, although banned in many EU countries, is still common practice in some for producing foie gras ('fatty liver'). This inhumane procedure causes severe suffering and high mortality among ducks and geese when they are confined in cages and forcefully fed via a tube until their livers become enlarged to several times their natural size. Force-feeding of any type should be banned across the whole EU, as should the import and sale of any product made using this practice.

## 5 Reduction of stocking densities on farms

Most animal welfare issues stem from the fact that animals are forced to live in overcrowded conditions and in unnaturally large groups without a stable hierarchy. This leads to them being stressed and overstimulated, to attacking and injuring each other, or even resorting to cannibalism. Current modern intensive systems fail to acknowledge animals as complex beings with a variety of needs, instead limiting the care provided to them to the bare minimum in order to keep input costs as low as possible. Intensive systems also promote the spread of zoonotic diseases, contribute to antimicrobial resistance due to antimicrobials being used to compensate for poor welfare, and pose a threat to our environment. Legislation should promote the reduction of stocking densities because good welfare can never be achieved in intensive farm settings. The fully-indoors system of husbandry should be abandoned in favour of allowing all animals access to outside areas where they can explore and forage.

# Welfare of Animals during Transport



The European Union holds the shameful distinction of being the world's biggest exporter of live animals. Numerous investigations and reports show that the relevant legislation fails to protect animals effectively during transport within the EU, and it does so even less on journeys to third countries. In transport, animals are forced to endure extremes of temperature and routine overcrowding. The harsh conditions lead to poor welfare, injuries and even deaths.

## 1 Reduction of long journeys by introducing absolute time limits of 8 and 4 hours for all animal transport

Transport is inherently stressful for animals. The longer the journey, the lower an animal's ability to cope. It is difficult if not practically impossible to assure a good level of animal welfare on journeys that take days or even weeks. As far as possible, therefore, live animal transport within the EU should be replaced by the transport of meat, carcasses, and genetic material. Animals for slaughter should be transported to the nearest appropriate slaughterhouse instead of undergoing long journeys, and mobile slaughter facilities should be further promoted in EU policy as an alternative to transporting live animals. The revised Regulation should set a maximum time limit of 8 hours for all animals transported for slaughter, fattening, or breeding both by road and by sea; for poultry, rabbits and end-of-career animals, the limit should be 4 hours due to their vulnerability. These time limits should be absolute, meaning that journeys should not continue endlessly through transits after animals are given a short period of rest.

## 2 Ban on transport of unweaned and pregnant animals

Both unweaned animals and pregnant animals are especially vulnerable, and their welfare is even more compromised under the tough conditions of transport. Unweaned animals are routinely transported even though their natural immunity has not fully developed yet, and they are unable to deal with weather extremes and the other highly stressful conditions of transport. They also often suffer from hunger for long hours due to complications with feeding them on trucks. Pregnant animals even give birth during transport if they are loaded at the late stages of pregnancy, ending with many of them and their newborns dying. Therefore, unweaned animals below the age of 8 weeks as well as pregnant animals for which 40% of the estimated gestation period has passed should be defined as unfit for transport and their transport banned.

## 3 Ban on export of live animals to third countries

In 2019, 4.5 million cattle, sheep and pigs were exported to non-EU countries. Among the most frequent export destinations are countries considered to be high risk for animal welfare, where horrendous cruelties on animals have been reported. Even before arriving at their destination, animals can suffer in heatwaves or freezing cold on journeys that can take days or weeks. Despite the Court of Justice ruling in the Zuchtvieh case, the EU cannot guarantee animal protection beyond its territory and animals are left without any real protection. The only solution that can fix this issue is a total ban on live animal exports and their full replacement with exports of meat, carcasses and genetic material.

## 4 Species-specific rules for live animal transport, including transport of fish

Space allowances, internal heights and temperature ranges all need to be based on the latest available science and need to reflect the individual needs of each species, even across different categories of the same species (e. g. pregnant or lactating animals). Species-specific standards need to be adopted for the transport of fish as well, at least for the most commonly farmed species, i. e. salmon, trout, sea bass, sea bream, European eel and carp. These have been often omitted from the scope of EU legislation do date.

# Welfare of Animals during Slaughter



Close to 9 billion land animals and between 500 million and 1.3 billion farmed fish are slaughtered every year in the EU. Despite a large body of science advising against them, the EU still authorizes the use of painful and cruel stunning methods and other practices that cause animals considerable stress and suffering prior to their deaths.

## 1 Phase out of waterbath stunning of poultry and high-concentration CO2 stunning of pigs

Both of these stunning methods cause severe suffering in animals, as confirmed by the European Food Safety Authority back in 2004, which called for these methods to be replaced. However, the Regulation did not include those recommendations for economic reasons and little has been done over the past two decades to remedy the situation. As a result, waterbath stunning and CO<sub>2</sub> in high concentration are still widely used in poultry and pig stunning respectively. Waterbath stunning involves painful and stressful shackling of poultry and the method has proven not to be as effective as necessary and desired, with many birds even missing the stunner completely. Carbon dioxide at high concentrations is highly aversive and leads to severe irritation of the eyes, nasal mucosa and lungs in pigs, as well as respiratory distress and intense suffering before the onset of unconsciousness. The revised legislation must speed up the long-overdue process of reform and the development of alternatives, so that both methods can be phased out and fully replaced as soon as possible.

## 2 Ban on culling of one-day old chicks

More than 300 million day-old chicks are killed every year in the EU as a by-product of the egg industry, commonly by maceration or gassing. That is despite the existence of such technologies that can recognize the sex of the embryo before it is hatched. Culling of day-old chicks should be banned and replaced by the alternative, which is in-ovo sexing and interruption of the incubation for unwanted eggs. The use of technologies for this purpose should be required to determine the sex before the 7th day of incubation, i. e. during the time when there is a high certainty that the embryo is not able to feel pain.

## 3 Ban on the use of electric prods

Electric prods are routinely used to move pigs and cattle, although the legislation considers them a last-resort option. In fact, they cause animals additional stress, making them hard to handle and creating a potential danger for workers. Similarly, paddles and clappers producing sound stress animals and so make it harder to work with them. If animals are scared to move, it is often because there is a problem with the slaughterhouse raceway. There are many rather simple solutions which can help mitigate this, such as adapting the design of the slaughterhouse, so that animals are not frightened by, for example, sudden changes of colours or shadows. However, the number one priority is to keep animals as calm as possible, and this starts at unloading. The proper training and monitoring of the workers is, therefore, the key to mitigating the problem. The use of electric prods should be banned for all species.

## 4 Harmonised and transparent use of the derogation for religious slaughter

As reports show, the use of the derogation allowing the slaughter of animals without prior stunning for religious purposes is not harmonised or transparent in the EU, with authorities at Member State level granting it under varying conditions. This can also lead to misuse of the derogation by operators simply wishing to speed up the slaughter lines in their facilities. The revised Regulation needs to remedy this by introducing a set of harmonised conditions for the derogation to be granted. Member States should also be required to report on the derogations granted, so the Commission has comparable data on the use of derogation across the EU.

## 5 Specific rules for fish slaughter

The Slaughter Regulation excludes fish from its scope, with the exception of a single provision requiring that animals are spared unnecessary suffering. However, across the EU methods that in the view of the World Organisation for Animal Health result in poor animal welfare are used to kill fish, such as chilling in ice slurry or salt baths and CO2 in holding water. The revised Regulation needs to prohibit such cruel slaughter methods and lay down species-specific rules for the handling of fish during slaughter.

# Animal welfare labelling



European citizens want higher animal welfare, but it is often argued that this demand does not translate into their buying habits. However, surveys show that while over half of the public are ready to pay more for higher-welfare products, citizens feel that they lack information on the conditions in which animals are raised, transported and slaughtered, and complain that there is a limited choice of such products on the market.

## 1 Mandatory 'method-of-production plus' labelling on all products containing animal-derived ingredients

The information gap caused by the lack of transparency on farming conditions and of education on the welfare of animals in modern farming systems needs to be addressed. One tool that might help would be the introduction of a method-of-production plus (MoP+) label for animal products. This provides the full picture but in an easy-to-understand way by combining a method of production labelling with simple information on animal welfare (such as a grade from A to E), so that consumers can see the level of welfare animals were afforded even without needing deeper knowledge of production systems and their impact on animal welfare. The criteria should cover the entire life of the animal, from birth, to breeding conditions to transport and slaughter conditions. To work properly, however, such a label needs to be mandatory. Firstly, since mandatory labelling is a more effective tool for harmonisation, it is more likely to be perceived as reliable by consumers and thus more likely to influence their consumer choices and be incorporated into their decision process. Secondly, because the more limited coverage of a voluntary label would not succeed in incentivising a shift to higher welfare products to the extent that a mandatory label could.



## Compassion in World Farming EU

Compassion in World Farming is an international organization campaigning to end all factory farming practices. Our office in Brussels works to strengthen legislation and enforcement on farm animal welfare and sustainable food systems, with a particular focus on Europe.

### Contact

Place du Luxembourg 12  
1050 Ixelles (Brussels), Belgium  
+32 2 709 1330  
[eu.office@ciwf.org](mailto:eu.office@ciwf.org)