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Revision of the EU legislation on animal welfare –Inception Impact Assessment

Feedback from Slow Food Europe

Slow Food Europe welcomes this revision of EU legislation on animal welfare and appreciates the opportunity to provide our feedback to the Inception Impact Assessment (IIA).

Each year the welfare of millions of animals raised for their meat, milk and eggs for human consumption is often seriously compromised. The industrial approach, which has transformed the rearing of animals into “zootechnics,” the science of exploiting animal production, and the farmer into an “agricultural entrepreneur,” has transferred the **industrial principles of economies of scale and mechanization to this sector.**

This transformation has had a **drastic influence on the wellbeing of animals**, which we know to be sentient beings, able to feel emotions, suffering, and stress. The conditions in which farmed animals are forced to live have serious repercussions: new **diseases** that can be transmitted to humans are developing, the **overuse of antibiotics** is leading to increased resistance among bacteria, and massive amounts of animal excrement are a source of **pollution** that affects the planet’s environment and climate.

To guarantee better welfare conditions for farmed animals (and better environmental and human health), one of the clear needs is **that production and consumption of animal sourced products are decreased drastically and urgently** due to the continuing escalation of the climate, biodiversity and antibiotic crises.

In general, Slow Food stresses that it is necessary to **introduce measures that take animal welfare into consideration by supporting farmers who choose to improve their standards beyond those required by national and European laws.** Slow Food strives for the full recognition of animal welfare as an element in future strategies on the sustainability of the food system.

At the EU level, Slow Food is convinced that greater coherence on food policies is needed and, in this respect, expects that the Common Agricultural Policy and the upcoming Farm to Fork legislative measures on animal welfare will provide real support to ambitious farmers, who operate or are willing to operate beyond legal standards, in the best interest of farmed animals and the wider ecosystems, including humans.

Regarding the Inception Impact Assessment for the Revision of the EU legislation on animal welfare, the following are the main observations and demands that Slow Food Europe wishes to deliver to the European Commission, to contribute to the initial phase of the revision.

A. Context, Problem definition and Subsidiarity Check

Comment: Slow Food Europe welcomes the consideration of core problems in animal farming and finds it rather comprehensive.

However, we would like to bring attention to the **importance of the role of animal biodiversity as a central issue for both guaranteeing animal welfare and the sustainability of animal farming**. More generally, we would like to shed light on the need for a paradigm shift in the relation between humans and farmed animals.

In Europe and North America, **local breeds have almost completely disappeared**. The main **threats** to domesticated animal biodiversity are increasingly intensified by **industrial farming; indiscriminate crosses; the rise in consanguinity or inbreeding**, which weaken the animals; the introduction of **exotic breeds**; the **lack of public conservation policies; poor competitiveness** with commercial breeds' yields; the **loss of pastures**, and **environmental pollution**. **Epidemics** and **natural disasters** can also contribute to the extinction of local breeds. Imported breeds replace local ones, considered less productive, but often they cannot adapt to the new environment, cannot replicate their performance and require invasive treatments with drugs that are highly dangerous to the environment. They also tend to need a high input of imported feed. The modern Western production model is perhaps the foundational element generating negative effects all along the chain. **Productivism has encouraged the selection of no more than around 30 livestock breeds, designed for maximum yield of milk or meat and their suitability for intensive farming.**

Productivity has increased, but to the detriment of ecosystem health, biodiversity and mutually positive interactions between different spheres. Many grasslands have been degraded due to excessive grazing or because of conversion to industrialized agriculture. Tackling the loss of livestock biodiversity means setting up in-situ conservation programs that can support guardian farmers, but also safeguarding genetic heritage through the establishment of semen banks. Also crucial is developing consumer awareness about the value of domesticated animal biodiversity. **Saving local breeds is important for many reasons, both economic and environmental, social and cultural**. Over time, animal breeds have adapted to different climates and environments and to hostile conditions (arid, cold, swampy, etc.) and marginal areas, where their presence can help protect the environment. More genetically diverse animal populations also seem to be less susceptible to large-scale epidemics. **Local breeds—more resistant, hardy, fertile and long-lived**, used to making the most of poor pastures for millennia—**improve producers' chances of surviving climate change**. Despite the close relationship between livestock production and biodiversity, many evaluations of

environmental performance in the livestock sector have paid great attention to greenhouse gas emissions while ignoring the value of animal biodiversity in environmental performance.

B. Objectives and Policy options

A) Animal Transport

Space allowances, travel times and travel conditions

Slow Food supports Option 1: *Update requirements in the light of new scientific evidence to increase animal welfare, as regards travel times and space allowances, and minimum and maximum temperature limits*

Comment: in addition to temperature, humidity and air quality should be considered for long journeys. Journeys should be prohibited for vulnerable animals.

Comment: since most animal transportations are to slaughterhouses and long journeys are to be avoided, availability of facilities in the proximity of farms should be encouraged by strengthening staff skill/competencies and simplifying paper-based procedures and structural requirements.

Live animal exports to non-EU countries

Slow Food supports Option1: *Prohibit the export of certain categories of live animals to non-EU countries in light of the difficulties of ensuring the compliance with animal welfare standards after the transport means has left the EU territory.*

Unweaned and other vulnerable animals

Slow Food supports Option 1: *Prohibit long journeys for unweaned and other vulnerable animals to increase their welfare, while addressing existing enforcement issues.*

Five domains (would address problem 4)

Slow Food strongly supports Option: *Introduction of common and comprehensive animal welfare principles and requirements, to ensure a high level of animal welfare based on:*

- a) good nutrition (e.g. adaptation of fibre for calves, such as hay),*
- b) good environment, (e.g. air quality, ventilation, humidity, temperature, fresh water),*
- c) good health (e.g. good controls of the animals by the farmer, appropriate treatments when needed, limitation of mortality by using resilient breeds of animals that are also resistant to external influences),*
- d) appropriate behaviour (e.g. perform natural behaviour, such as rooting, scratching, nesting, jumping, flying and exercising), and*
- e) positive mental experiences (e.g. social contacts, enrichment material).*

B) Animal welfare at farm level

Duty of care

Slow Food supports Option 2: *as above, with standard operational procedures extended to all farms.*

Comment: paper-based standard operational procedures should be required only to larger farms/conventional farms (need for a criterion to better define what this is).

Standard operational procedures are burdensome and not effective for small-scale operators.

A prohibition on cages/stalls (would address problems 4 and 7):

Slow Food supports Option: Prohibit the use of cages/stalls for all species referred to in the ECI “End the cage age” (i.e. pigs, laying 6 hens, calves, rabbits, pullets, broiler breeders, layer breeders, quail, ducks and geese to apply after certain transition period(s)). This measure would update legislation in the light of scientific evidence, while ensuring a higher level of animal welfare for an important number of species

Requirements for livestock farming systems (would address problem 4):

Slow Food supports Options: Measures to require increased outdoor access or increased access to fresh air will be considered

Increased space allowances (would address problem 4):

Slow Food supports Options: Increased space allowances, based on the latest scientific evidence and advice, as regards floor space and height.

Imported products of animal origin (would address problem 6):

Slow Food supports Option 1: Similar animal welfare requirements to be applied at import and in particular as regards the use of cages in the EU.

Animal welfare indicators

Slow Food supports Option 1: Further mandatory Animal Based Measures (in complement to Resource Based Measures) and thresholds for action, to facilitate compliance and enforcement

Comment: new species animal welfare requirements should focus on animal based-measures. Resource-based and management-based measures should be assessed only when warning thresholds are reached for animal-based measures.

Regular assessment of animal-based measures should be mandatory. Thresholds for action should allow some flexibility according to context/farming systems.

Comment: the European Union should create animal welfare assessment indicators fitted for extensive husbandry models: they should be based on animal-based parameters and on agroecosystem health where an integrated multidisciplinary approach is needed (including the participation of: veterinarians, agronomists, ethologists, biologists).

Animal welfare assessment should consider agroecosystem health in a One welfare perspective

C) Animal welfare at the time of killing

Comment: encourage the possibility of applying "emergency slaughtering procedure" to animals reared in extensive systems, promoting unconscious slaughter (on-farm stunning and jugulation, rather than transfer to abattoir).

Comment: Well-managed mobile slaughterhouses and on-farm slaughter will become increasingly important in improving EU animal welfare standards. It is fundamental to support these systems widely.

D) Animal welfare labelling

Slow Food supports Option 0: *There is no EU legislation on animal welfare claims or labelling. Some EU rules provide consumers with a certain degree of information on farming methods used and thus on the level of animal welfare protection during production. This is the case for EU rules on organic farming, which provide high animal welfare standards and for EU marketing standards for eggs in shell, which provide mandatory labelling requirements (indication of the farming methods). EU marketing standards for poultry meat define farming methods for broilers (and the possibility of voluntary labelling of the same). The rest of the information to consumers on animal welfare is based on national labelling schemes (when they exist) which follow various approaches and provide different levels of animal welfare protection. If no action is taken, the provision of (some) animal welfare information to consumers will depend on the limited regulation above, and on (divergent) national initiatives, or on market forces (voluntary private labelling schemes). The prevalence of few national standards over the others might contribute to contain uneven national requirements and a proliferation of schemes which would be detrimental to cross border exchanges. However, there is no indication that this is happening and that it would eventually properly address consumers' expectations*

Comment: Animal welfare labelling should go beyond the farming system, aiming at including several parameters in the scheme (feed, living conditions, animal density, animal-based indicators). It should be avoided that simple compliance with the minimum legal requirements regarding on-farm animal welfare level could be used as a tool to promote meat product through labelling system ("animal welfare certified" or similar). Animal welfare certifications should go beyond the minimum legal requirements.

General Comments:

Slow Food Europe

- calls for a ban on live exports and inclusion of more restrictive criteria on live animal transport in general.
- calls for the inclusion of other species, such as fish, in the new legislation
- reiterates full support of the phase out of cages across all species under the new animal welfare legislation (in line with the ECI End of the Cage Age)
- calls for an extension EU animal welfare standard to be applied to imported goods
- calls for stricter rules of AW claims on voluntary animal welfare labelling systems
- calls for coherence with other policy areas: Common Agricultural Policy, Farm to Fork, Biodiversity Strategy, Public Health

For more reference please consult:

Slow Food [animal welfare general criteria](#)

Slow Food [Presidia guidelines](#)

Slow Food [Position Paper on Biodiversity](#)

Slow Food Europe position paper on the [Farm to Fork and Biodiversity strategies](#)