The reaction of European farmers and European agri-cooperatives to the EU strategy for the protection and welfare of animals 2012-2015
Key messages

Copa-Cogeca:

- welcomes the new EU strategy for the protection and welfare of animals 2012-2015 and wishes to contribute actively to its development and implementation;

- encourages the enforcement of existing animal welfare legislation in all Member States before new animal welfare requirements are even considered. Incentives are needed to ensure that farmers are suitably rewarded for their animal welfare activities.

- welcomes the Commission’s proposal to develop a simplified EU legislative framework on animal welfare, but only if it really does represent a step towards simplifying the existing legislation, giving more flexibility to operators and reducing administrative costs;

- welcomes the acknowledgement of the need to provide more information on animal welfare to the general public, but the strategy still lacks concrete measures to improve the distribution of animal welfare costs throughout the food chain, including consumers;

- calls on the EU institutions to recognise the experience that European farmers have acquired on animal welfare when discussing the development of awareness and education campaigns for stakeholders;

- welcomes synergies with the Common Agriculture Policy (CAP). However, the strategy does not address animal welfare in a broader and more coherent EU policy framework including environmental, climate change, competition and trade policies. There is a lack of ambitious measures to ensure reciprocity of EU animal welfare standards with third country imports.
Introduction

- On 19th January 2012, the European Commission published a new strategy for the protection and welfare of animals for the period 2012-2015. This new strategy is intended to strengthen some of the existing measures previously put forward as part of the 2006-2010 action plan, but also to promote a more comprehensive approach to improving animal welfare conditions in the European Union.

- Copa-Cogeca welcomes this new strategy and takes this opportunity to confirm its views on the issue of animal welfare and the interest of contributing actively to the development and implementation of this new EU strategy.

- Throughout the history of animal husbandry, farmers have naturally sought to ensure the welfare of their animals, to keep them healthy and free from suffering or pain and to provide adequate conditions for wellbeing. Good animal health is a significant part of animal welfare and is also important for ethical and practical production reasons.

- European farmers and their agri-cooperatives aim to address consumers’ needs and wishes, supplying sufficiently healthy and high-quality agricultural and food products at affordable prices. At the same time, they comply with high European animal welfare standards. They fully intend to continue pursuing these objectives in the future.

- In order to do so, they need coherent European policies which enable their farms and businesses to remain economically viable whilst responding effectively to new challenges such as the growing demand for food, limited natural resources, the effects of climate change, the emergence and spread of new diseases and free market competition across EU Member States and third countries. Unfortunately, the strategy does not address the issue of animal welfare within a broader and more coherent EU policy framework including environmental and climate change policies.

- Copa-Cogeca believes that opportunities exist for more market orientated animal welfare. However, 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.
Enforcing existing legislation before new animal welfare requirements are even considered

- Copa-Cogeca encourages the enforcement of existing animal welfare legislation in all Member States, with sufficient controls being carried out by authorities in case of unfair competition on the internal market. This will ensure legal certainty and guarantee investment in the long run. The Commission must reassure European farmers that they will not impose new animal welfare standards until the financial and technical investments made so far have adequately paid off.

Incentives needed

- Incentives are needed to ensure that farmers are suitably rewarded for their animal welfare activities and are able to cover the high costs incurred through compliance with legal animal welfare requirements at farm level.

A simplified EU legislative framework on animal welfare

- Copa-Cogeca 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 the existing legislation, giving more flexibility to operators and reducing administrative costs. This must be the precondition before discussing new animal welfare standards in Europe.

- Copa-Cogeca would emphasise that the European Union has already issued the general Directive 98/58/EC on the protection of animals kept for farming purposes. Any discussions on the development of a simplified legislative framework should consider the outcomes of the final report on the implementation of Directive 98/58/EC expected in 2013.

- Copa-Cogeca fully supports a common basic regulation at EU level, ensuring harmonisation and a level playing field at EU level, including the use of common guidelines, but also the possibility of voluntary market agreements being made.

- Copa-Cogeca can support the use of science and outcome-based welfare indicators provided that these are developed in close co-operation with operators and are simple, practical and easy to implement without incurring costs at farm level due to additional burdens. Flexibility is needed since we are addressing live animals, and animal biology may differ from case to case.

- Although Copa-Cogeca welcomes the research behind the Welfare Quality Project, and its achievements, we would like to stress the need for further improvements and simplification of the existing protocols before implementation is even considered. The protocols are still not at a stage where they would be practical and cost effective to apply.
• Copa-Cogeca supports the need to carry out a feasibility study in order to understand the contribution a simplified EU legislative framework would make with respect to using animal welfare indicators.

**Awareness and education about animal welfare**

• Proper knowledge of animal welfare is a relevant aspect of good herd management. Copa-Cogeca believes that the experience which European farmers have acquired should be properly recognised. However, documenting farmers’ skills should not create further administrative burden at farm level.

• Farmers are in many cases already part of continued awareness and education campaigns on animal welfare. However, non-legislative instruments, such as sector-specific guidelines, communication and education campaigns could be developed further to improve animal welfare at farm level. The industry already plays an important role in ensuring high on-farm welfare standards through private schemes and codes of good practice, and this should be recognised by the EU.

• The Commission highlights the lack of knowledge of animal welfare amongst stakeholders and the lack of awareness of alternative practices for better animal welfare within production systems. However, there is no recognition of the lack of involvement of farmers in research projects, as well as the economic and financial difficulties of carrying out long-term structural investment in farms, and the practicalities and acceptance of new production methods amongst consumers.

**A European network of reference centres**

• In principle, Copa-Cogeca would be in favour of improving the way in which existing knowledge on animal welfare is coordinated, shared, disseminated and finally implemented across EU Member States. However, the ultimate aim should be towards ensuring simplification of existing tools for cost-effective implementation at farm level (e.g. outcome-based welfare indicators) and not creating further complications.

• Creating a European reference centre should be considered carefully to avoid it becoming excessively bureaucratic, with endless discussions on how matters should be assessed. Considering the proposed activities, Copa-Cogeca believes that the European Food Safety Authority, Joint Research Centre, Standing Committee for Agricultural Research, the Advisory Groups of the European Commission, as well as the Better Training for Safer Food programme could already contribute substantially to some of the objectives of an EU network.

• If a network is proposed, Copa-Cogeca believes that its activities must be solely limited to coordination, monitoring and knowledge sharing, with the active involvement of EU stakeholders. Rather than being directly involved in scientific experiments, this network should instead coordinate the testing of new techniques and impact assessments of animal welfare standards, based on the latest available knowledge.
European farmers invest in animal welfare financially through levy boards and contributions to relevant projects, usually at national or regional level. Farmers are already major financial contributors to applied research and on-farm research. Copa-Cogeca therefore requests that they be given a greater coordinating role in the prioritisation of EU-funded animal welfare projects. Copa-Cogeca wants to work with the Commission and national authorities to achieve more efficient use of research funding from both public and agricultural sources. This could be coordinated with the new European flagship programme, which aims to contribute to achieving the EU 2020 goals.

Recognising the significant budgetary implications a coordinating body would have, Copa-Cogeca requests that it be financed carefully. To simplify the process, we would be in favour of using existing structures available at EU or MS level without creating an additional agency, as this would have further budgetary implications.

We welcome the acknowledgement of the need for more information on animal welfare, but the Strategy still lacks concrete measures to improve the distribution of animal welfare costs throughout the food chain

Copa-Cogeca warns that the strategy lacks concrete measures to improve the distribution of the significant animal welfare costs faced by EU producers throughout the food chain. It is important to highlight that our non-EU trade partners do not face these additional costs.

Copa-Cogeca questions the assumption that consumers will always pay higher prices for welfare-friendly products, and urges the Commission to continue research in this area.

Copa-Cogeca welcomes the acknowledgement of the need to provide consumers and the public with appropriate information. The European Commission should raise awareness for the existing high animal welfare standards and requirements met by European farmers on a daily basis. This would help European consumers to understand some of the reasons why European animal based products are more expensive than third country imports. This could also serve as an exercise in bringing society and agriculture closer together (e.g. open farms).

It is assumed that consumers will be willing to pay more for welfare-friendly products if they are well-informed about animal welfare. Copa-Cogeca believes that, in reality, this is not always the case; and although a premium is paid by some consumers, there is no clear evidence that the premium will be passed on to farmers. There is a lack of references in the
strategy to the impact of the unbalanced power along the food chain from farm to fork and the consequences of the inappropriate functioning of the food chain on farmers’ profitability.

- **Lack of ambitious measures to ensure reciprocity on EU animal welfare standards in trade agreements with third countries**

  - Copa-Cogeca believes it is important for the Commission 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. However, strengthening international cooperation on animal welfare is not enough. Reciprocity on animal welfare standards should be one of the main requirements when negotiating trade agreements with third countries.
  
  - Unfortunately, the European Commission has failed to grasp this opportunity and provide evidence of specific actions and results.

- **We welcome synergies with the Common Agriculture Policy (CAP) but the strategy does not address animal welfare in a broader and more coherent EU policy framework**

  - There are clear conflicts and a lack of consistency between the EU Animal Welfare Policy and other EU policy areas such as environmental regulations, which are not mentioned at all. Changes in farming systems in order to comply with animal welfare requirements have environmental implications and can affect greenhouse gas emissions, whether they are intensive or extensive. Those trade-offs should be examined further, in particular concerning water, biodiversity and climate change policy.

  - The CAP is already a guarantee for European consumers that animals are raised in compliance with high traceability, animal health and welfare and environmental standards. However, more simplification is needed rather than more legislation.

  - Copa-Cogeca is following discussions on the welfare of fish with great concern, in particular the application and interpretation of Regulation (EC) 1/2005 regarding the transport of fish, as the existing rules were intended only for terrestrial animals. Best practice guidelines for the transport of fish are currently being drawn up by the private sector.
Copa-Cogeca is the united voice of farmers and agri-cooperatives in the EU. Together, they ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe. Copa represents over 13 million farmers and their families whilst Cogeca represents the interests of 38,000 agricultural cooperatives. They have 70 member organisations from the EU Member States.