



Position paper on the Welfare of Rabbits in the EU

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Introduction

Ahead of the upcoming revision of the legislation on Animal Welfare, Copa and Cogeca would like to share its views on the different aspects that the legislation will cover¹. Our aim is to prepare the sector for the challenges of the future while contributing to the work of European institutions as risk managers in designing its regulations. This paper will exclusively focus on the welfare of rabbits, although there are other technical and economic aspects within the sector worth addressing.

The European rabbit sector has gone through several crisis periods in the last decades. These have substantially impacted production, leading to the sector being lost in certain EU Member States. The weakness of the rabbit market is an extremely limiting factor for the economic profile of its farms². The sector has already seen a significant decrease in the number of rabbit farms in the main producing countries and a trend of concentration due to the closure of small businesses. The sharp decline in rabbit meat consumption coupled with the seasonal nature of demand and impending changes to legislation add further uncertainty. However, it is certain that without public funding for improved housing systems, and health and farm management, the sector's survival remains at risk.

¹ New animal welfare package, namely on on-farm welfare, and particularly the Commitment of the European Commission to phase out the cages in animal farming, animal welfare during transport and at the time of killing. We do not cover animals at slaughter and welfare labelling in this paper. Please see Copa Cogeca position on AW labelling here: [AHW\(23\)02987](#)

² Bertazzoli A., Ghelfi R. (2005). Creazione del valore nella filiera cunicola. Giornate di Conigliicoltura ASIC 2005, p. 17-20.



Characteristics of the sector and its role in the rural economy

Despite being limited to particular regions of Europe and cultural traditions, the rabbit sector plays an important role in rural economic growth. It contributes to the creation of jobs located in rural areas of Europe, mostly in villages of less than 2000 inhabitants. Moreover, female labour is well-represented in the sector with women accounting for almost 50% of the workforce.

In addition, cooperatives play an important role in the rabbit sector. They enable smaller producers to pool their supply and make joint investments in sustainability, health and welfare, as well as in slaughterhouses. The aim of this is to ensure all cooperative members benefit from the added value of their products.

We must keep in mind that the impact that new legislation may have on livestock sectors will not be limited to livestock-related economic activity (i.e., farm maintenance, slaughterhouses, feed factories etc.) but will also have a major impact on local businesses. To ensure the survival of the sector, all three pillars of sustainability must be taken into consideration – environmental, social and economic – to prevent production loss or stop it being transferred to third countries with lower standards.

To remain consistent with sustainability objectives, one must recognise that for the rabbit sector, some animal welfare issues may be in conflict with health considerations. Preserving good animal health and welfare conditions in Europe and ensuring a competitive livestock sector is in the interest of society. Farmers play an essential role in monitoring the health of their animals and they know the appropriate action to take and do so at the earliest opportunity.

Citizens' perception of animal welfare does not always match what science understands as animal welfare. Yet this perception sometimes leads to diverse legislation with a lack of practical solutions, which creates an imbalance between the investments in animal welfare and their economic output. Costs are often not compensated by the market, and while consumers demand higher animal welfare, the current price inflation does not allow consumers to make choices in line with that. We reiterate that the European rabbit meat sector is always willing to improve its animal welfare standards; however, it must be ensured that animal welfare legislation is based on scientific evidence and not driven by ideology. All solutions must be tested in real life conditions to make sure

that farmers do not compromise other aspects of sustainability or animal welfare when redesigning their farms. This is why continuous training is also a necessity for the sector throughout the different stages of the transition.

Finally, the progress made in the EU rabbit sector must be acknowledged. In recent years, the sector made great strides in terms of use of antibiotics, due to their being used in an increasingly sustainable fashion. This has been achieved by the industry using the “all in, all out” management system on a regular basis on farms as a fundamental biosecurity tool. Copa and Cogeca call on the European Commission and the European Parliament to commit to this vision when it comes to revising its animal welfare rules while ensuring animal welfare and health³.



Welfare at farm level

Current practices in terms of stocking density allow producers to have an appropriate cost of production with a suitable use of feed, allowing farms to remain profitable. A potential change in stocking densities would have implications beyond the cost that any shift of housing systems would entail.

For good welfare practices at farm level, rabbit health and hygiene are a fundamental consideration. Raising rabbits on litter can be harmful and increases the mortality rate by three to five times due to stagnant faeces and urine. This leads to coccidiosis, colibacillosis and, subsequently, immunosuppression of the farm population which facilitates the proliferation of several infectious diseases. Scientific evidence shows that the design of the floor must allow the animals to be kept separate from their faeces. As such, rabbits cannot be kept on the ground. They prefer to be kept on slatted floors rather than deep litter^{4 5}.



Housing systems

The sector is willing to study the initiative to improve housing systems in rabbit farming. However, in the case of fattening, the drastic change of housing system would require large investments. The possible loss of profitability of this new production model also needs to be taken into account as do the consequences it would have on the welfare of the workers and animals alike.

Up to now, scientific studies show that it is not possible during the reproductive cycle to keep reproducing does in groups. This due to aggressive behaviours. We strongly believe that any change in this respect would worsen the welfare of the reproducing does and their offspring⁶.

³ “In a large majority of specialised farms, cages are predominantly “dual purpose” [...]. In farms using these cages, while the doe is moved after weaning to a clean and disinfected enclosure, kits remain in the same cage where they were born until slaughtering. This also permits the all-in, all-out approach, as well as cleaning and disinfection for the following incoming reproduction cycle.” (2021 EURCAW-Poultry-SFA).

⁴ Matics, Z., et al. (2003). Examination of free choice of rabbits among different cage-floors. *Agriculturae Conspectus Scientificus*, 68(4), 265-268. Orova, Z., et al. (2004, September). Free choice of growing rabbits between deep litter and wire net floor in pens. In *Proceedings of the 8th World Rabbit Congress*, Puebla, Mexico (pp. 7-10).

⁵ EFSA AHAW Panel (2020) - Scientific opinion on the health and welfare of rabbit farmed in different production system

⁶ Pérez-Fuentes S, et al. Effect of different housing systems (single and group penning) on the health and welfare of commercial female rabbits. *Animal*. 2020 Jun;14(6):1270-1277. doi: 10.1017/S1751731119003379. Szendrői, ZS., et al. L. 2019. A review of recent research outcomes on the housing of farmed domestic rabbits: reproducing does. *World Rabbit Science*, Volume 27, Issue 1, pp. 1-14.

We believe that the risk assessors must use a balanced and scientific approach based on data and on-farm experimentation, so that risk managers adopt a species-by-species approach. This is the only way to analyse the needs animals have during the different stages of production.

Example not to follow: The German case

The implementation of measures that are too extreme and/or without sufficient transition periods could cause irreparable damage. For example, the German law on rabbit housing, adopted in 2014, established a two-step transition period:

Step 1: Five years for all husbandry systems.

Step 2: Systems with more than 4000 cm² per reproducing doe could benefit from the 10-year transition period.

Result: The number of rabbit farms fell sharply, from 60 commercial farms in 2014 to 15 breeders left in 2022. We expect that by the end of the transition period (2024), there will be no more than 10 breeders left.

Looking for alternative housing systems could improve the animal welfare of the sector, but at some stages of production, these efforts could cause stress and illness in the animals.

We, therefore, call on the legislators not to determine a single type of housing management for reproducing does as there are currently not enough studies which support any one particular optimal partial grouping system. We also welcome the approach towards environmental enrichment of housing and improvement of the behavioural development of the animals. However, the precautionary principle should always be borne in mind to not install elements in housing which could present a risk to the hygiene of the animals.



Welfare during transport

Currently, rabbits are being transported in a way which optimises their welfare. The European rabbit meat sector is carrying out studies to bring more knowledge and continuously improve transport. Current containers size is designed to minimise injuries caused by truck movement. Reducing loading density would, on the one hand, considerably increase the risk of injuries, and on the other hand, increase the cost of transport per

kg of live weight while multiplying the number of journeys and the various means of transport used.

For instance, if EFSA's opinion on minimum space allowances and suggested container heights were to be applied, this would lead to an increase of 200-250% in the cost of transport per kg of live weight for the sector compared to the current situation. The environmental impact of the measure would be enormous. Many slaughterhouses would also need to change the live animal intake area. This is an example of why the welfare of the animal cannot be considered as the only criterion when it comes to breeding.

With regard to the duration of transport in rabbit farming, as animals are transported in containers, time should be counted from when animals are loaded until the containers are unloaded from the truck. Fasting and time spent waiting at the slaughterhouse should not be counted. It should be noted that fasting is necessary for sanitary reasons. Regardless of the establishment of a maximum transport time, an acceptable margin should be determined in the event of possible contingencies. Finally, we emphasise that future legislative proposals regarding transport should also be based on scientific evidence regarding species specifics with proposed conditions tested in the field. Continuous training is also needed for operators.



Trade

Consistency with other EU policies such as the Green Deal and its strategies must be ensured. Trade must be based on balanced, fair and transparent rules to avoid distortion of competition. In principle, imports to the EU must be in line with Union requirements for its own farmers, especially when it comes to food safety. Accordingly, stricter controls must be carried out on imported meat. The application of the same animal welfare requirements to imported products is a necessity. If not, a situation similar to that of laying hens will arise whereby conventional cages (banned in the EU) are sold again to non-European neighbouring countries which now export to the EU. This is a clear example of unfair competition and evidence that trade reciprocity is difficult to achieve in practice.

In addition, due to the tighter restrictions and higher production standards ensuing from EU legislation, we see a risk that the operators would close their facilities and move outside the EU with the aim of further supplying the market. This should be considered when developing new legislation to tackle this trend.





Conclusion

To conclude, any change in legislation that entails costs to the farmers should first be accompanied by an impact assessment, followed by adequate economic support measures to compensate for the changes in structure and the loss of profitability. Sufficient transition periods are also key so as to avoid the closure of many farms, or even the loss of the sector.

If the rabbit farming sector may not always attract private enterprise because of the lack of return on investment, it remains widespread in certain EU regions and makes a significant contribution to EU agriculture. Like many livestock sectors nowadays, it is vulnerable to changes (such as the imposition of substantial changes in production management or emerging diseases resulting from demedicalisation) because of the lack of replacement tools to deal with them.

Improvements in terms of animal welfare must not overrule the viability of the sector as a whole in order for rabbit meat to remain affordable.



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Copa and Cogeca are 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 22 million farmers and their families whilst Cogeca represents the interests of 22,000 agricultural cooperatives. They have 66 member organisations from the EU member states.