

## **Answering the public consultation on animal welfare**

Briefing for stakeholders and the public

### **Introduction**

The European Commission recently opened a [public consultation on the revision of EU animal welfare legislation](#) to allow stakeholders such as EU-citizens, non-EU citizens, companies, producers, universities, trade unions, business associations, NGOs, and so on to share their views on the topic.

It is crucial to provide evidence that public support is high for improving animal welfare standards for all farmed animal species - banning caged farming is a must, paired with equivalent standards for products imported from third countries. The practice of killing male chicks must be phased out as well, and on-farm animal welfare standards must be raised to meet the expectations of EU citizens.

The following guidance was developed by Eurogroup for Animals to support all stakeholders with their answers to the public consultation on the revision of EU animal welfare legislation.

**The questionnaire remains open for submissions until December 12th, midnight Brussels time.** We do not recommend waiting until then to submit as the questionnaire has multiple questions and to submit a response, one must create an [account on the European Commission's website](#).

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## The Answers

### 1. Questions about the current situation of animal welfare in the EU

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- *“EU legislation regulating animal welfare at farm level does not ensure that farmed animals can express normal behaviours.”*

**FULLY AGREE**

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- *“Unnecessary administrative burdens for EU farmers and business operators result from the coexistence of EU regulation, national rules, and private standards.”*

**FULLY AGREE**

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- *“The broad or unspecific nature of some EU requirements lead to differences in how Member States enforce them, creating distortions in the internal market.”*

**FULLY AGREE**

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- *“Food of animal origin coming from non-EU countries should have equivalent animal welfare standards to those of the EU.”*

**FULLY AGREE**

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- *“EU rules need to align with societal expectations regarding the treatment of farmed animals, such as phasing out cages for certain animals.”*

**FULLY AGREE**

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- *“The systematic killing of male layer chicks in the laying hens’ sector is ethically problematic.”*

**FULLY AGREE**

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**2. How important is it that the revision of the EU legislation for on-farm animal welfare contributes to the respective main objectives of the EU Vision for Agriculture and Food?**

- *“An agri-food sector that is competitive and resilient.”*

**VERY IMPORTANT**

- 
- *“An attractive and predictable agri-food sector.”*

**VERY IMPORTANT**

- 
- *“A future proof agri-food sector that is functioning within planetary boundaries.”*

**VERY IMPORTANT**

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- *“An agri-food sector that values food, fosters fair working and living conditions.”*

**VERY IMPORTANT**

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**3. How important is the phasing out of cages for certain categories of animals?**

**VERY IMPORTANT (ALL)**

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**4. Which barriers do you consider most significant in moving away from cage systems?**

- **NOTHING apart from OTHER**

*“Lack of clarity from EU officials on timeline of delivery of proposals, resulting in a crisis of trust towards EU authorities” (this should be rewritten in your own words - for example, a prolonged period of legal uncertainty undermining trust etc)*

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**5. Which is/are the most important supporting measure(s) needed to ensure a smooth transition into a cage-free farming system in the EU?**

**YES TO EVERYTHING (except long transition periods! + tick “other” and add the text below)**

**Exceptions:**

- Long transition periods - **NO**
  - **OTHER** - *“A swift delivery of the full package of legislation covering all species farmed in cages. Including imported products is key to achieve the policy objective of improved welfare in the EU and will enable EU producers to transition faster/smoothly to cage free systems.” - (this should be rewritten in your own words - for example, a delivery with no longer delay, or a quick publication of draft legislation and so on)*
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**6. Which of the following elements could contribute most to simplify the overlapping of animal welfare rules applicable to farmers and reduce administrative burden, while ensuring improved animal welfare outcomes?**

- Clearer and more operational legal provisions
  - Clearer roles and responsibilities
  - Wider use of digital monitoring tools
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**7. To what extent should imports of animal products comply with equivalent animal welfare standards to those applied in the EU?**

**FOR ALL THE EU ANIMAL WELFARE REQUIREMENTS + OTHER** *“aquaculture/fish”*

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**8. Which supporting measures could facilitate the transition to equivalent animal welfare standards in third countries?**

**YES TO EVERYTHING (ONE EXCEPTION)**

Exception:

- Long transition periods - **NO**
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**9. To what extent could clearer and more consistent EU rules on on-farm animal welfare help ensure fairer conditions for farmers across Member States?**

**VERY LARGE EXTENT**

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**10. In which ways, and to what extent, could the use of animal welfare indicators (e.g. behaviour, injuries, mortality) help to improve animal welfare on farms?**

*“By improving the enforcement of the improved animal welfare rules on farms.”*

**VERY LARGE EXTENT**

*“For benchmarking purposes, e.g. helping to identify farms with higher animal welfare standards.”*

**VERY LARGE EXTENT**

*“By supporting policy monitoring, i. e. tracking how Member States implement animal welfare objectives.”*

**VERY LARGE EXTENT**

**OTHER** - Animal welfare indicators are important tools, however they are not a substitute for higher animal welfare standards included in legislation. Indicators can help with implementation and monitoring of the effectiveness of the new legislation, and help with harmonising the implementation at Member State level. Indicators can also be relevant to determine which standards in third countries are equivalent to EU standards and can help in auditing/controlling compliance. **(this should be rewritten in your own words - for example, animal welfare indicators are a tool, not a solution. They cannot be used instead of better animal welfare laws)**

11. To the extent that affordable alternatives to the systematic killing of male day-old chicks in the egg production sector are available, how urgent is it for the EU to require the use of such alternatives?

**VERY URGENT**

The open feedback questions can be answered with up to 5000 characters in each question and are important to elaborate answers given in the limited section above. **Please do not copy-paste these answers and rewrite as much as possible in your own words.**

12 a) In your view, what are the most important changes that should be made to the current EU legislation on on-farm animal welfare?

**Insert welfare ask here!**

- *Improved welfare standards for **all farmed species**, including broilers, other poultry species, aquatics, rabbits, equines, with species-specific legislation. **Ban on caged farming for all farmed species and equivalent standards applying to imported products.***
- *Top priority asks (list non-exhaustive):*
  - *For laying hens: ban on caged farming (with a transition period of 4-5 years) and stocking density must not exceed 7 hens/m<sup>2</sup>*
  - *For broilers: phasing out of fast-growing broiler breeds and decreasing the stocking density with no derogations*
  - *For pigs: ban on gestation and farrowing crates (with a transition period of 3-5 years), ban on tail docking. Group housing for pregnant sows, with individual separation only for veterinary care, insemination (limited to 4 hours), or short-term recovery from illness/injury. Farrowing pens must be at least 7.8 m<sup>2</sup> (+ 6m<sup>2</sup> outdoor area), including a designated piglet creep area (1.2 m<sup>2</sup>) and at least 5.5 m<sup>2</sup> of bedded lying/nest area, measured at floor level and excluding any separate creep. Pens must allow the sow to turn around easily and enable expression of maternal behaviour, while still offering piglet protection against crushing.*
  - *For aquatics: to ensure farmed aquatic animals (fish and decapods) are included in the scope of the upcoming legislative revision, equivalent welfare standards are applied to seafood imports, and species-specific binding welfare rules are put in place covering the entire aquaculture production chain.*
- *Ban on mutilations and forced moulting*
- *Ban on force-feeding*
- *Ban on day old poultry culling (including male chicks and ducklings)*
- *Prohibition of breeding and release of farmed game animals*

**12 b) How can these changes be designed or supported in a way that also enhances the competitiveness and long-term resilience of the EU livestock sector?**

**Insert economic arguments here!**

- *Farmers must be supported with the transition to cage-free farming through robust financial instruments*
- *Increase the CAP envelope to make more funding available for animal welfare. Ensure ambitious agri-environmental and climate actions to improve animal welfare.*
- *A resilient, strong sector is based on farming methods that are sustainable in the long term - higher animal welfare standards are at the heart of this transformation*
- *Case studies looking at the financial side of transitioning to higher welfare systems*

**13. Do you have any additional comments, views, or evidence to share related to the revision of EU legislation on on-farm animal welfare?**

**This is an optional question:**

- *Better enforcement is needed, but it cannot be a substitute for improved animal welfare standards included in legislation*
- *Share case studies of successful transitions to cage-free farming, or higher welfare farming standards for those species that are not farmed in cages but we are fighting for higher animal welfare standards (for example broilers)*