



# Why and how should we improve the welfare of farm animals within the future CAP ?

## FEWER animals and BETTER welfare: a challenge for the Green Deal and the CAP

**Farm animals** are a major part of agricultural production. The conditions in which farm animals are kept have a fundamental effect on the animals themselves, as they are sentient beings, and also have major impacts on humans, nature, landscape, the climate and future generations. Many impacts are negative while some are positive and valuable.

**Planetary boundaries** are a scientific concept describing that available land and resources are very limited. Human diets should adapt. Our high production and consumption of animal products are unsustainable. Agriculture, food and trade policy must be advised by the wealth of evidence about this.

Sustainability is also an **ethical issue**, Compassion is legitimate. An economic system cannot claim to be sustainable while the exploitation of the most vulnerable, such as farm animals, generates sufferings.

Thus planetary boundaries and ethical considerations lead to a paradigm for sustainable animal farming summarized by "**LESS and BETTER**". It applies not only to consumption but also at the production level.

The challenge for the Green Deal and the new CAP is to **ensure income for farmers** while meeting the **environmental emergency** and **ethical concerns**.



*Ruminants emit the greenhouse gas methane. It is imperative to reduce the number of cattle worldwide, because of major environmental impacts. However, fewer cattle, robust breeds, grazing on biodiverse permanent pasture which sequesters carbon and conserves soil and water resources, with good management for high welfare, can help to feed the world in a sustainable and ethical way.*

## Income for animal welfare ? A question of political will and coherence

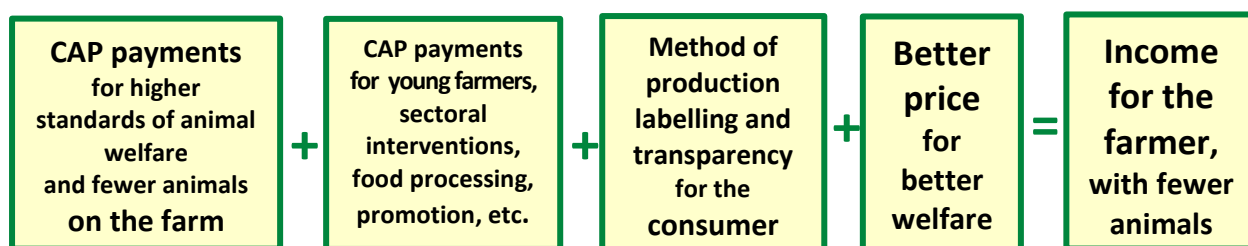
The EU's agriculture policy has been dominated for too long by the model of high productivity with low production costs, but deleterious impacts. Farm advice and industry have focussed on a permanent increase of productivity per animal, per square meter, per kilo of feed, per human working unit. That model has led to a vicious circle that has destroyed jobs and caused over-production and price collapse. Most stakeholders recognize that the system has gone too far, but the result is a social, technical and economic "lock-in" from which it is difficult to escape.

**CAP subsidies continue to lack coherence** as they do not yet differ between supporting those practices which are positive for animal welfare, the environment and rural development, and those which are

inhumane, polluting and damaging. There has been much under-investment and inefficiency in animal welfare and environmental protection.

**On the other side consumers increasingly indicate their willingness to pay for improved animal welfare.** European citizens sign petitions and support NGOs for animal welfare. They don't sign petitions for precision breeding, genomic selection, air scrubbers and automated systems. Obviously the taxpayers prefer their money to be spent on animal welfare than on technical fixes of factory farming, which is widely rejected by the public.

**Many farmers**, probably the majority, would be happier with fewer animals, if they could earn a good living.



*Significant improvement of animal welfare has a cost. But the main difficulty is to make the difference of high animal welfare known and credible, and to organize processing and sale. This is why the CAP must become more coherent, in order to achieve economic viability for a high standard of welfare.*

**Political will and better alignment of public policies** are needed to ensure a fair income for farmers who adhere to high standards of animal welfare.

Instead of aiming to produce ever more animals per active person as it was the case in the CAP up to now, the objective must be to **increase the number of jobs**

per number of animals that are produced.

**The objective of generating income with reduced numbers of farmed animals and improved welfare must be fully integrated in the Farm to Fork (F2F) strategy, the Green Deal and the CAP.**

## Why is the reduction of livestock essential ?

We cannot avoid the unpalatable facts about the climate and environmental crises. Desertification and climate hazards are increasing. Land use change has dramatic consequences; the oceans are endangered. Many national and international prospective studies conclude that **consumption of animal protein in Europe must be reduced between 50% and more than 80%** to provide **healthy food** to a **growing population** within **planetary boundaries**<sup>1</sup>. The high amount of animal protein available in developed countries is unnecessary. These superfluous proteins are often sold at knockdown prices. This comes down to food and feed waste.

**Over 60% of the cereals used in the EU are fed to animals.** The use of pesticides is linked to mass production of animals: if there were a reduction in our consumption of animal protein, the yields of crops grown without pesticides (eg organic) would be sufficient to meet nutritional recommendations for better health.

**The EU imports an excess of nitrogen in the form of roughly 33 Mt/yr of soy** (19 Mt meal and 14,8 Mt oilseed) **mostly for animal feed.** Soy production is often linked to deforestation, to the poverty of small farmers in regions of soy monoculture, and to land grabbing. This import of nitrogen (generating manure),

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<sup>1</sup> The beneficial reduction of animal protein in developed countries is always clear if the objective is to provide a healthy diet (FAO, INRAE). Maximal reduction occurs for scenarios which adapt to planetary boundaries (Future Nordic Diets, EAT-Lancet commission, *Saving land to feed a growing population* for NL). The reduction is about half by optimizing land use in France (Afterres 2050) or by applying organic agriculture in Europe (TYFA).

is added to the excess of mineral nitrogen fertilizer, which is very energy-intensive to produce. All this nitrogen causes high emissions of nitrous oxide, a powerful greenhouse gas (GHG). The excess nitrogen pollutes water (nitrates) and air (ammonia and small particles harmful to health). The eutrophication of natural environments affects most of Europe, except a few mountain areas.

**Concerning GHG, the emissions of methane by ruminants considerably exceed the amount that can be compensated by storage in permanent pasture.** European programs like Carbon Dairy spotlight some modest mitigation of emissions. This does not negate the major negative environmental impacts of the dairy industry whose excessive growth is totally disconnected from real nutritional needs.

**Concerning poultry, the message of an increasing demand** in the domestic and export market encourages producers to invest in industrial poultry housing. Such a policy is irresponsible, in view of the devastation caused by soy and by pesticides, and the physical and psychological suffering of the animals bred for unnaturally fast growth and kept at high stocking densities.

**Technical fixes alone are not sufficient to adapt our excessive animal production to planetary boundaries and available land.**

**Renewable energy is urgently needed.** Biomass can be used as a source. However, natural resources of biomass are very limited. Therefore the challenge is to find a **new balance between plant and animal production**, and at the same

time preserve and enhance **soils** and **biodiversity**. This new balance should benefit to animals and prioritize **welfare**.

To avoid importing soy, arable land in Europe can be used to grow **protein crops** for feed. But this should only get support by the CAP alongside a reduction in the number of farmed animals and improved animal welfare and not simply perpetuate the mass production of animals.

**Environmental impacts** can be evaluated by the method of Life Cycle Analysis. In general the result will differ depending on whether the impact is measured per kilo of product (meat, milk, eggs) or per hectare of land. As soon as imported soy is taken into account, the footprint is increased. Yet a relatively low impact per kilo is still

wasteful if the produced kilos are in excess or not wanted, or if the production method is unacceptable for welfare reasons. It makes much more sense to take into consideration the impact on an area as a whole, including the ecosystem and the social services provided. Therefore **pulses, grassland (especially extensive grassland management), hedges, agroforestry and wetlands** are key values to be promoted by the new CAP. Fewer farm animals overall who are kept on pasture and in free range systems can be part of the **landscape and ecosystem services**.

“One welfare” includes people, animals and environment. A new CAP must help farmers to live decently, respecting their animals, landscape and biodiversity, their water resources and the climate.

## Why have the billions of the CAP been so inefficient in reducing animal suffering?

The main **objectives of the CAP** have been to support producers' income, the single market and competitiveness.



*Young bovines, particularly males but also females, are currently fattened at high density, often uncomfortably on fully slatted floor. They are deprived of pasture and unable to carry out many natural behaviours.*

**Vicious circles fuelled by the CAP** are at the heart of the blockage of progress for animal welfare. Ethical quality is ignored. The political will to ensure cheap food to the population has led Europe, using the CAP, to indirectly finance the price war among retailers and their often unfair trading practices (instead of tackling poverty).

Farmers produce more and more meat, milk and eggs, paid an ever lower price. Thus the CAP, which is supposed to support an income, has indirectly financed the upstream industry (tractors, pesticides, animal housing, technologies) and let the downstream industry (processing industry and

retailers) absorb the productivity gains achieved on the farm.

The will to develop competitiveness on the world market exposes the producers to a dangerous volatility of price and demand.

Price pressure makes it impossible to shift to more animal- and environment-friendly production methods.

**European legislation** on the protection of animals is weak and full of derogations, allows unacceptable practices, and is often poorly implemented.



*Turkeys suffer from high density, deprivation of all natural behaviour, debeaking, pathogenic hyper-productivity...*

Thus **cross-compliance**, which includes certain (not all) minimal standards for animal protection, has not brought adequate improvements in welfare.

**The first pillar of the CAP** indirectly finances the production of cheap feed for factory farms, by providing **payments per hectare**. Furthermore, **coupled aid support** offered per animal are used for beef cows, whose calves are for a large part intended for live export. No animal welfare or environmental considerations are required (except some weak legal minimum standards).

Within **the second pillar** the financial envelopes are limited. The objective 'animal welfare' has to compete with

other objectives, notably 'competitiveness'. The specific 'animal welfare' measure (actually article 33) has not even been proposed in France. Investment payments for **animal housing** are very popular but are no measure of welfare. They can be good or very bad, e.g. they help to install fences on a free range farm or to buy cages for sows or install an uncomfortable fully slatted floor for pigs or calves.

Subsidies intended for **energy saving or renewable energy** (biogas) are given without considering animal welfare and make factory-farming more profitable.

The CAP supports **so-called 'quality' schemes**, without considering animal welfare. Production with poor welfare can benefit from it. E.g. Protected Geographical Indications do not impose animal welfare conditions; for pork products the production is frequently non-compliant with minimal standards. Regional schemes are a problem if they receive payments despite low ambition.



*A sow in a farrowing crate suffers from deprivation of all natural behaviour such as locomotion, nest building, maternal and other social behaviour and natural foraging. Such confinement and selection for hyper-prolificity generate major health hazard.*

The **lack of knowledge** about animal welfare and of motivation to improve it remain a major problem to be addressed.



*Physical and psychological distress of millions of dairy veal calves in Europe are due to the denial of the cow-calf bond, separation, long transport, and fattening first in small boxes and later in small groups on slatted floor with inappropriate feed intended to keep their flesh pale by anaemia. The dairy sector should feel responsible and urgently finance steps to end the inhumane separation of the cow from the calf and respond to the needs of calves.*

There is **no mandatory labelling of method of production** except for shell eggs. Marketing of meat and milk can be misleading, giving false assurance to consumers.

Animals suffer from permanent **underinvestment in welfare**. And despite of the climate emergency, Europe spends millions of euros annually on the **promotion of milk and meat**.

**If animal suffering had a financial cost, and if decision makers had to pay for it, they would understand that the CAP must change.**

## **What is animal welfare about ? What must be financed ?**

The concept of animal welfare refers to the physical and emotional well-being of an animal. As sentient beings, animals can suffer and feel pain, but they can also enjoy life. Proper attention to meeting animal welfare needs means meeting an animal's **sanitary, physiological, behavioural, affective and cognitive needs**, minimising avoidable distress (including pain, fear and chronic stress), and providing the opportunity to have positive experiences.

It is important to apply these principles to **all categories of farmed animals**: male, female, breeding and fattening animals, young animals and particularly male calves and kids born as valueless by-products of the dairy industry.

**A good housing system** provides good ventilation and therefore good air

quality, natural daylight, appropriate periods of daylight and darkness, and ideally is open to **fresh air**. It should provide **more space** than the legal minimum stocking densities.

The **resting area** must be comfortable, with sufficient, clean bedding (litter, straw, maybe a mattress for dairy cows). It should provide **different climate zones** so animals can choose where they want to be, depending on the species and individual needs: staying inside or outside, having the choice of an isolated or a cool place to lay down, keeping a distance or resting close together. This is particularly important for pigs.

A general principle is to structure the available space into distinct '**functional areas**', where the animals can move at their own pace, rest or be active and explore, feed or drink or defecate. More submissive animals must be able to move away from dominant ones.

**Enrichment** means that appropriate equipment or substrate is provided, to allow natural behaviour such as foraging, rooting, chewing, exploring (pigs), scratching and pecking (poultry), etc.



*These sows benefit from increased surface and distinct functional areas for resting, feeding, activity and exploration, and defecation. They have litter and, ideally, an outdoor access. Reducing the number of animals is crucial.*

**Access to an outdoor area is an essential improvement.** As there is more space, there are more opportunities for animals to carry out their natural behaviours, to begin with physical activity. Move for health !

Fresh air and outdoor climate stimulation are healthy.

Free range is optimal for social interactions with fellow herd- or flock-mates. Conflicts can be resolved by taking distance, and the animals can choose proximity for friendly interactions. They can play together.

A semi-natural environment is likely to interest the animals.



*Why not target excellence...*

The natural behaviour of foraging is an essential need: pigs dig the ground and explore with their snout, poultry scratch and peck. For ruminants, even a limited grassy area is better than zero pasture.



*A high quality outdoor run with trees and hedges attracts poultry outside, to explore, peck and scratch, dust bathe and sun themselves.*

**Genetic selection for unnaturally high productivity** is a major issue, causing significant suffering particularly for poultry bred for a fast growth rate and for dairy cows bred for high yield. Sows bred for hyper-prolificity suffer from welfare and health hazards, and the unnaturally large number of piglets is incompatible with natural suckling. This detrimental trend must be reversed.

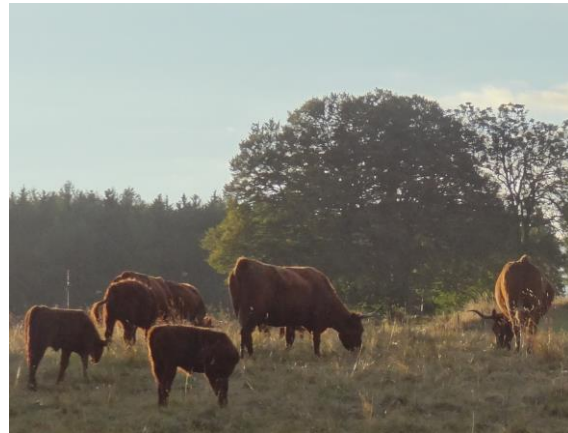
**Mutilations** provide evidence of the violence used to force animals into living conditions which are not fit for them. **Tail docking** of pigs and of lambs, disbudding of calves and kids with a hot iron driven into their head, and in regard to poultry **debeaking, declawing and pinioning** (cutting the wings through the bones of the 'hand'), are unacceptable practices, and they are generally done without any anaesthesia or pain relief. The same is true of castration of piglets and male lambs. Such agonising mutilations continue to be widely used, pointing to the shocking lack of

proactive and ethical research and development. When castration, tail-docking or disbudding are considered to be unavoidable, experienced and proven techniques of anaesthesia combined with post-operative analgesia and pre-operative sedation are available. It is necessary to train veterinarians, competent authorities and farmers in order to make available relief for farm animals (whatever the cause of the pain is) as good as it can be (and currently is for companion animals).

**Recognition of the importance of social groups** where familiar animals are kept together in stable groups, (e.g. at batching of cattle and sows) and of family ties must be improved. This is impossible today for chickens that leave the hatcheries by thousands. The topic of emotional bonds and social learning will certainly become increasingly important in terms of societal demand. The common practice of forced **early weaning** of young mammals from their mother should be stopped.

**Removing an animal from his or her herd and familiar surroundings** in order to sell it and take it to slaughter is very hard.

**Slaughter on farm or very nearby** is a strong demand from society and farmers and deserves support.



*A vision of excellence is that animals are born, live their lives and die in the same farm or very nearby.*

**Long distance transport and live animal export** are a cause of great animal suffering.

**Animal welfare audits on farm**, combined with an **improvement process**, must be supported. What is needed is sincere ambition, not 'welfare-washing.'

**The billions of the CAP can improve animal welfare. All it needs is the political will to do so.**

## **What tools could the new CAP have to enhance animal welfare and generate income for farmers?**

**The Proposal for a Regulation of the European Parliament and of the Council establishing rules on support for strategic plans to be drawn up by Member States under the Common agricultural policy (CAP) from the European Commission in June 2016**

continues to be a cause for concern regarding farm animal welfare in Europe. It has great opportunities but also a high risk of cynical business as usual.<sup>2</sup>

<sup>2</sup> The following considerations are mainly based on the French experience.



Article 6 of the proposed regulation lists the specific objectives and among them animal welfare (objective (i)). These objectives are welcome, but the question remains to what point agribusiness will dictate the options in terms of competitiveness, technology and digitalization. Animal welfare on farm might bring income to farmers (especially small farmers) in rural areas, without necessarily requiring industrial investment such as precision farming.

Article 11 of the proposition for a regulation made by the Commission deals with **conditionality**. In regards to the protection of animals it includes only three Directives laying down minimum standards, excluding laying hens and broilers; the lack of ambition is obvious. Beyond legal standards the EU has also defined standards for **good agricultural and environmental conditions of land (GAEC)**, which give meaning to conditionality (article 12). The same logic should be applied to animal welfare, by defining **Good Conditions of Animal Welfare**. These could match the move upmarket foreseen by the industry as a common ground for future conventional production. Without turning industrial systems upside down, such Good Conditions of Animal Welfare could reduce stocking densities and add at least some enrichment, natural light and audits on the condition of the animals.

Article 13 concerning **advisory services** lacks any mention of improving animal welfare beyond minimum legal standards. Advising and enforcing minimum standards is not enough. Minimal standards stay far from ensuring welfare.



*Scientific knowledge and practical experience on animal welfare are available, e.g. how to stop tail-docking for pigs, which is a legal obligation. But the implementation on farms takes a terrible delay... See **EURCAW Pigs***

Support for **young farmers** (article 27) should be linked to environmental and animal welfare conditions, prioritising organic farming.

**Schemes for the climate and environment** provide support for voluntary schemes ('**ecoschemes**') covering commitments which go beyond mandatory requirements established by law e. g. for animal welfare (article 28 b)). The integration of such payments for animal welfare in the CAP Strategic Plans of member states seems feasible but uncertain. This opportunity should not be missed. It makes it possible to define animal welfare services to be funded. Using such funded improvements as a basis, public and private players can develop their own **specifications**, depending on how ambitious they choose to be, in order to **label** their animal welfare standard and add value for higher welfare. Thus the cost of higher welfare will be more affordable because it will be shared between the motivated consumer and the CAP. This complementarity can facilitate **economic viability of high welfare farming** and help to reduce the number of animals. This is essential for the sake of the environment. But article

28 2. binds ecoscheme payments to eligible hectares under the pretext of WTO rules. This argument requires serious verification. In view of the very many and diverse aids that are accepted by the WTO it is difficult to imagine that there should be no tool for payments which improve animal welfare while reducing the number of animals. It is important to prioritise the service rendered to society and to create jobs. Such '**welfare-ecoscheme**' payments could encourage more space, enrichment and outdoor access, the housing of pigs with straw, free farrowing for sows (i.e. cage-free), pasture for ruminants, free range or/and winter gardens for poultry,...

**Coupled income support (article 29)** aims to *help the sectors or productions or specific types of farming...addressing the ... difficulties they undergo by improving their competitiveness, their sustainability or their quality.* According to article 30 this can be done where these are important for economic, social or environmental reasons. The "or" must be replaced by "and" : the support must be justified for economic and social and environmental reasons, and it must include conditions of improved animal welfare. The concept of quality should include essential animal welfare criteria beyond minimum legal standards (e.g. pasture for ruminants). There is an absolute need of coupled support not only for beef cows, but also to encourage fattening and finishing **bovine males and females on seasonal pasture.**

The need for more coherence applies to payments for **protein crops**. Support for protein autonomy makes sense, provided that feed for industrial animal farming is excluded.

**Interventions in other sectors (Article 59 (d))** introduce quality objectives. However *methods of production respectful...of animal welfare standards* should be replaced by: *methods ... improving animal welfare beyond current mandatory standards* (which are inadequate).

**Protected designation of origin, protected geographical indication or national quality schemes (article 59 f))** have little or no meaning for welfare. Quality schemes should be reconsidered.

An important positive point is that national strategic plans can provide **sectoral interventions** for the health and welfare of animals (article 60 1. (a) vi).



*Loading, transport and slaughter of spent laying hens are cruel. The CAP should support many nice, small free range farms and on-farm slaughtering.*

**Rural development (the second pillar of the CAP), article 65 5.(b)** provides **payments for voluntary animal welfare commitments** beyond minimal legal requirements and GAEC, and different from ecoscheme. This option should become mandatory for all member states.

**Investment aids**, mainly for **animal housing**, have a high risk of supporting not only nice 'alternative' systems but also systems with very poor welfare, such as cages for rabbits and sows, fully slatted floor for pigs and calves, and high density poultry houses.

Support for technologies which save energy or produce **renewable energy** (e.g. biogas) is very popular. Those subsidies can perpetuate low welfare industrial animal farming systems. This perverse effect must be stopped.

The same ambiguity occurs with the attribution of a bonus for **young farmers**. They should be discouraged from investing in low welfare systems.

Payments for **food processing companies** and for **marketing** could help to make better animal welfare economically viable.

Overall it is essential to **refine the criteria for eligibility and selection** of projects to ensure they support sustainable, high welfare systems. Up to now these criteria have been inefficient for sustainability and for welfare.

National **state aids** must also become much more coherent and ambitious. They have financed systems with very low welfare, reflecting incompetence.

**Governance** must become more balanced. Consultation with NGOs should be developed. Taking societal expertise into account before grant decisions would avoid investments in systems which will be rejected by the public (and maybe by retailers, e.g. cage eggs) before depreciation of facilities. It is wiser to anticipate.

**The new CAP should give the right signals and not allow to invest and to waste public money for systems whose societal rejection is known or predictable.**

## **The proposed indicators are miserable: how can they be improved ?**

Article 7 of the proposed regulation deals with indicators listed in Annex I.

Output indicators report the number of beneficiaries, of hectares, of heads, reflecting if the money has been spent.

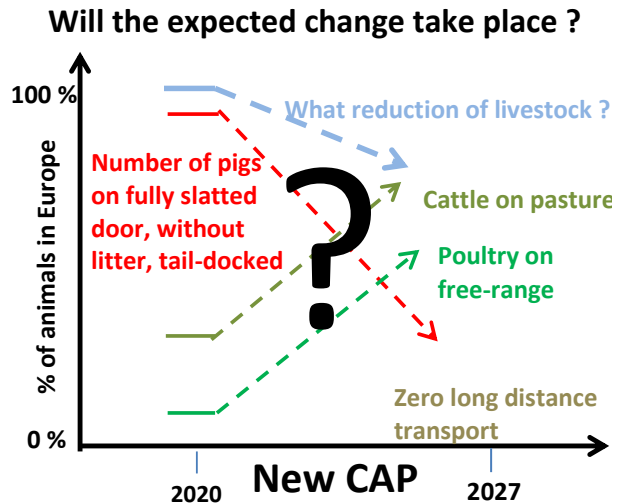
Result indicators report the percentage or share of farmers, advisers, land, farmed animals,... which are supported and under commitment. Concerning the objective to meet societal expectations (Article 6 (i)) we find the share of livestock units supported to reduce antibiotics, the share of land concerned by so-called sustainable use of pesticides and the share of livestock covered by support to improve animal welfare, without any qualitative information. Finally, only the impact indicators are supposed to quantify the concrete effects achieved. Concerning the ninth

general objective (meeting societal expectations), the proposed impact indicators are poor and not suitable. Animal welfare is not treated separately. The value of the production under quality schemes (including organics) acts as an indicator. But unlike organic agriculture and specific welfare labelling, most so-called quality schemes in the EU have no ambition or guarantee concerning welfare. Thus organic agriculture appears as the only (indirect) indicator of animal welfare. But at best currently only a few percentage of farm animals in Europe are organic. Also there appears to be confusion between reducing antibiotic use and improving animal welfare ; this equation is by no way acceptable. Animal welfare is much more than correct sanitary condition.

**Meaningful indicators :**

the share of livestock which benefits from:

- Comfortable housing (bedding)
- More space than minimum standard
- Enrichment
- A ban on the use of cages
- Outdoor access
- Ban on mutilations
- Effective pain treatment
- Local or on-farm further fattening and slaughter
- Welfare audits and improvement process



This indicative diagram does not claim precise figuring

**Free trade wrecks the efforts of the CAP for sustainability**



*Breeding for live export, which causes intense suffering, should not get any financial support.*

Reduced consumption of meat and milk in Europe is good news for environment and climate. But the European Commission and producers are looking for export markets to keep production at its current high, unsustainable, level. **EU trade policy** is not currently evaluated for its **impacts on the climate and animal welfare** due to unrestricted transport and irresponsible consumption. **The global reduction in numbers of livestock must become an objective of European climate and trade policy.**



*Global trade flows of egg products come from cages.*

The idol of 'competitiveness' mostly leads to a deleterious speed race of distortion of competition. Farmer's income, environment and animals are the losers.



*Europe is worldwide the first exporter of pork products and does not succeed implementing its own weak standards for animals and environment.*

**EU farmers, mainly beef farmers, are assured some income thanks to the generous support of taxpayers via the CAP, while price pressure is increasing.** Critical competition due to imports and trade agreements makes it worse. As it is inconceivable to let these farmers disappear, the CAP will pay them and thus will indirectly benefit to producers in North America, the Mercosur (and Australia) who sell meat in Europe. This is not the objective of the CAP.

**All this trade at the expense of animals can never become ethically acceptable. It has to stop.**