Animal welfare – EPHA’s input to the Inception Impact Assessment “Revision of the EU legislation on animal welfare”

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Considering the current sustainability and health challenges posed by food systems, and in the context of the implementation of the Farm to Fork and Biodiversity Strategies, but also the newly updated Veterinary Medicines and Medicated Feed Regulations, the European Public Health Alliance (EPHA) welcomes the revision of the European animal welfare legislation to open the way towards more sustainable animal farming. EPHA would specifically like to highlight two crucial issues: the relationship between high density animal farming operations, excessive farm antibiotics use and the risk of antimicrobial resistance (AMR) and the need for transparent, harmonised and mandatory animal welfare labelling across the European Union (EU).

1) **On antimicrobial resistance (AMR)**

Animals are sentient beings and deserve the highest levels of protection. The assertion that the European Union (EU) has one of the world’s highest standards of animal welfare cannot serve as proof that these standards are sufficient. Apart from the intrinsic value of protecting animals, a strong link exists between the health of people, the health and welfare of animals and the health of the planet, as captured by the One Health approach, which has long been acknowledged by the European Commission. This set of interlinkages should therefore be a leading principle in the review of the EU’s animal welfare legislation to maximise systemic co-benefits between human, animal and planetary health and thereby to reduce the risks linked to antimicrobial resistance (AMR).

AMR is a major health threat, and the overuse of antibiotics in animal farming, which may be used to compensate for poor animal husbandry conditions, an important contributing factor. Some practices, such as avoiding long transportation of young animals or increasing space allowances to create less crowded living conditions, would lower related stress level and the spreading of diseases such as diarrhea or respiratory issues, thereby helping farmers to reduce dependency to regular use of antibiotics. In this light, higher and harmonised animal welfare standards among European Member States would facilitate antibiotics use reduction and help to prevent the development and spread of zoonotic diseases. Better animal
farming practices could also result in lower environmental pressures linked to large scale, intensive animal farming and pharmaceutical pollution.

2) On animal welfare labelling

Consistent with the revision of EU marketing standards for agricultural products, EPHA welcomes option 1 & 3 of the inception impact assessment on animal welfare labelling. After the successful introduction of a mandatory system of labelling eggs according to the method of production, EPHA supports the extension of this type of system to all animal and fish-based products across EU Member States.

Option 1 would create the necessary framework to regulate and harmonise animal welfare claims at the EU level. The European Commission definitely has a role to play to make sure there is no unfair competition among animal breeders and that consumers get transparent information regarding the true value of the supply chain.

Option 3 elaborates on key welfare criteria for a uniform EU animal welfare label. Such label should provide transparent and clear information regarding the level of animal welfare all along the life of the animals including the rearing, transport and slaughter. The EU should require all animal-derived foods of all species to be labelled as to farming method, including intensive indoor, this being the system in which most EU farmed animals are kept, and for labels to indicate the use of fast-growing breeds, which is linked to animal welfare and health concerns and may impair the One Health approach to reducing antibiotics use and the risk of AMR. Finally, the label should be multi-tiered, labelling from minimum EU standards until highest welfare standards, and should also include imported products, either by labelling them to the equivalent criteria or as non-compliant with the minimum EU standards.

The European Public Health Alliance (EPHA) is a leading European NGO alliance advocating for better health in EU policies. Food Systems & Antimicrobial resistance is a priority policy area. https://epha.org/.