

Upon request from the above NGOs, with whom Eurogroup shares concerns relating to the current EU agricultural policy, we would like to make the following comments on the vision which was published in December 2009.

Vision (p.1)

It is fair to propose a farm policy to produce healthy, quality and safe food while respecting the environment. We think however that it is necessary to make a clear reference to the production methods with regard to animal welfare. For example using new technologies to reduce methane emissions from individual ruminants could have detrimental effects on the animals' welfare. Therefore we would like to see a statement included in the vision concerning the protection of animal welfare. This statement would translate the EU sustainable development strategy objective that animal welfare standards must be improved in the EU, and the obligations for the European Union and the Member States to "pay full regard to the requirements of animal welfare" in formulating and implementing the Union's agriculture policies, in line with Article 13 of the Lisbon Treaty¹.

1. Introduction

The sustainable challenge (p.3)

In the 4th paragraph starting with "Changes to agriculture..." the following should be added at the end of the second sentence, after "...negative environmental effects": "**and negative impacts on animals' welfare and health**".

Public money for public goods (p.5)

We agree with the principle of public money for public goods. However there are many definitions of public goods. In this paper public goods are defined as goods that cannot be provided by the market. The paper says that "environmental improvements which go beyond basic good practice should be considered as public goods." In our views, good animal welfare is a public good and support should be provided under the future EU agriculture policy to production systems which respect good animal welfare standards.

Eurogroup also believes that farmers should be able to sell their products at prices guaranteeing them a fair living. Fair prices should internalise the cost of production. In that way there would be no need to support farmers just for their farming activities, but for the added value they provide to society.

Sustainable production needs sustainable consumption (p.7)

We completely agree with the section on the need to modify consumption patterns as they are unsustainable. We agree it is not the right place to discuss related policies, recognising at the same time that modifying agriculture policies in the proposed way needs the modification of other policies as a prerequisite. We are concerned that retailers and food producers' policies may push prices down in order to provide consumers with cheap animal products and boost consumption. This needs to be changed to give incentives to farmers to produce less quantity of good quality and more sustainable products.

¹ Article 13 "In formulating and implementing the Union's agriculture, fisheries, transport, internal market, research and technological development and space policies, the Union and the Member States shall, since animals are sentient beings, pay full regard to the welfare requirements of animals, while respecting the legislative or administrative provisions and customs of the Member States relating in particular to religious rites, cultural traditions and regional heritage."

2. Policy objectives (p.8-9)

We believe that the policy objectives are fair, even though it is for us essential to highlight the way animals are treated and it is a priority to improve their welfare. The link between environment protection and the protection of animal welfare is not clearly stated, even though it seems logical that fewer animals, treated in a better way would mean less impact of animal production on the environment and thus better environment protection.

We feel that the statement page 9 “*A key objective of the policy should be to accelerate the transition towards more sustainable farming systems that can combine high productivity with reduced environmental impacts and careful resource use*” can be questioned, especially considering the emphasis put in the rest of the document on the need to support systems which are less productive but more sustainable. Certainly, as far as animal production is concerned, less but better would be more suitable as an objective. The emphasis should also be on different and more adapted productions rather than high productivity.

In the same paragraph we would add “... well adapted plant varieties **and animal breeds**,... “

In the proposal, organic farming is included as a system which warrants support. We agree that organic farming usually is good for animal welfare (although there might be problems with the treatment of diseases) but there are other extensive schemes applying good animal welfare standards which also warrant support, such as **Freedom food**² in the UK or **Label rouge**³ in France. We do not believe that organic farming should be the only farming system receiving support.

4. Environment Regulations as a baseline (p.13-14)

Cross-compliance rules must be maintained. They must also be extended to animal welfare standards which are currently not covered by cross-compliance: laying hens and broiler chickens standards, and to any new EU animal welfare standards which may be adopted in future. In the note 10 (p.14) concerning sanitary and animal welfare rules, a clear distinction should be made between identification for traceability and animal welfare rules, as their impact is not at all the same on extensive livestock farming. There are no specific welfare standards for cattle, sheep and goats, the species raised in extensive grazing systems, but the general farm directive applies (Directive 98/58) and its provisions are very general. We do not see how they can put extra burden on these producers, as they do not go further than good practice. It is important that the welfare of the animals raised in all systems including extensive systems be taken into account. Extensive systems do not automatically guarantee good animal welfare, as good management is an important aspect for animal welfare.

5.3. Support to systems delivering high levels of public goods (p.18)

Eurogroup thinks that systems with high animal welfare standards should also be supported. To that aim there is a need to define animal welfare standards which are significantly higher than legal minimum requirements, whose application would justify public support. Those stricter animal welfare standards would naturally be associated with more sustainable practices providing environmental protection.

Final remarks

We would like to ask to the five organisations who are proposing this new policy the following questions:

- How does the vision tackle the environment and animal welfare problems of very intensive poultry and pig production? We think for example in the problems for the environment, animal welfare and public health generated by pig factory farms in Brittany, where toxic algae are now developing due to polluted sea water from industrial pig farms, presenting serious health risks for people and animals.
- According to the proposal, organic fish farms should also be supported. Do you agree and if yes, given the serious problems for animal welfare and the environment, could you justify it with public goods and sustainability arguments?

² <http://www.rspca.org.uk/freedomfood/>

³ <http://www.poultrylabelrouge.com/>