

23rd August 2021

**Revision of EU Legislation on Animal Welfare
Submission by the Irish Cooperative Organisation Society**

The Irish Co-operative Organisation Society (ICOS) is the umbrella body for over 130 co-operatives in Ireland – including the Irish dairy processing & milk purchasing co-operatives, livestock marts and other rural based enterprises, such as breeding societies, animal health and AI societies – whose associated businesses have a combined turnover in the region of €14 billion, with some 150,000 individual members, employing 12,000 people in Ireland, and a further 24,000 people overseas.

As our members are involved in the rearing, trading and exporting of livestock, ICOS is pleased to provide its feedback on the inception impact assessment by the European Commission on the revision of EU Legislation on animal welfare, which makes a number of assertions and suggested policy options for the future of these activities.

First and foremost, ICOS believes it is important to acknowledge that EU animal welfare standards are the highest in the world and that Ireland's farmed animal population, including 6.7 million cattle and 4.6 million sheep, have a high welfare status.

Animal welfare is an unquestionable priority for our members across the entire livestock sector. ICOS members recognise that a key component of the food supply chain is the health and welfare of farmed animals, which underpins consumer confidence and the reputation of Irish and EU food produce. Our dairy co-operatives proactively engage with their members on animal welfare issues and provide a range of extension and support services, including advice and education regarding breeding options and calf rearing, to ensure a high quality of life for all animals. Additionally, our cooperative livestock marts offer Irish farmers an important outlet to market their livestock in an increasingly restricted market place. The live trade and movement of animals, within Ireland and export to the EU and to third countries is an integral part of our livestock production and provides the basis on which our dairy and beef sectors operate.

We would note in light of this, that this inception impact assessment precedes the outcome of the European Commission "fitness check" of the current legislation and practices. Therefore, the various positions outlined in inception impact assessment regarding problems and potential solutions remain at this point assumptions. ICOS considers that any revision of the current legislation regarding animal welfare must be based on appropriate data and scientific evidence and therefore further progress should await the completion of the fitness check and solutions be selected on the basis of its outcome.

Feedback with regard to the proposals outlined within the Inception Impact Assessment:

Animal Transport

- ICOS firmly asserts that the current EU legislation on animal welfare during transport, Regulation (EC) No 1/2005, is effective and fit for purpose, ensuring a high degree of traceability and welfare throughout the chain. Clear conditions and administration are set within the

regulation to ensure this, including on transport practices, the handling of animals, watering and feeding intervals and resting periods; transporters and handlers are required to hold a certificate of competence; and strong guidelines on determining fitness for transport have been developed, in conjunction with civil society organisations and the Commission. Therefore, the focus of any policy revision should be on full and equal implementation and addressing non-compliance, rather than a complete overhaul- as it is non-compliance with the existing legislation which is the source of current problems or negative events, rather than gaps in legislation or too low standards. We therefore believe an additional assessment option should be considered within the impact assessment based on this, regarding measures to strengthen equal enforcement and full compliance across the EU.

- Space allowances, travel times and travel conditions: Scientific evidence shows that it is the quality of transport and not the length of the journey which is the most important factor for animal welfare. This must be borne out within the Commission's review and an additional assessment option included which considers upgrades which could be made to travel conditions (including space allowances and minimum and maximum temperatures) while maintaining existing journey times. Reducing maximum journey times would disproportionality and significantly impact island countries like Ireland, which rely on sea transport of animals in order to access the EU Single Market.
- Live animal exports to non-EU countries: The proposed option to prohibit the export of live animals to non-EU countries is a radical proposal without proper justification. Third countries have different animal welfare standards and it is necessary to recognise those which do have robust animal welfare legislation in place and work with those whose legislation can be improved. The best means of encouraging international standard improvements is through trade and training as proposed under Option 3. Third country trade is an important market route for EU livestock farmers given domestic price pressure and putting significant limitations or prohibiting exports would cause economic hardship for EU farmers without contributing to the improvement of animal welfare in a global context.
- Unweaned and other vulnerable animals: No definition is provided for what is to be considered a vulnerable animal and bearing in mind the current political discourse, ICOS would highlight that should age be a main contributing factor, different age brackets must be analysed and considered for their impact- the difference of a few weeks can have significant implications for supply chains and on-farm costs. Long distance travel for young animals is possible and can comply with the current animal welfare discussion.
- Means of transports: Given Ireland's isolated position as an island on the western periphery of Europe, live export by sea is vital for our connection to the EU single market. Access to this route to market is essential for Irish farmers, with a lack of alternative options. New rules with regard to sea transportation risk creating new barriers in the single market to the specific disadvantage of Ireland. It would also undermine the significant investment put into lairage and feeding facilities at Cherbourg, the chief export port for Irish calves, over the last two years to maintain and enhance welfare standards and ensure minimal stress to the animals before, during and after their journey. Consideration of the specific needs of island nations and an up-to-date assessment of the existing facilities and sea vessels must therefore be a central part of the Commission's assessment of the legislation applicable to sea transportation.

Animal Welfare at Farm Level

- **Imported Products of Animal Origin:** In line with the international objectives of the EU Farm to Fork Strategy, ICOS welcome the assertion with the inception impact assessment that more work must be done to ensure that agri-food products imported into the EU observe our animal welfare requirements in their production. These standards must also be incorporated into EU trade discussions and promoted within international organisations in order to encourage a global increase in standards and address competitive distortions.

Animal Welfare Labelling

- We support efforts to strengthen the EU Single market and to improve transparency and communication with consumers and therefore support the consideration within this legislative review of an EU system for animal welfare labelling.
- Many important considerations have already been noted within the inception impact assessment, including the need to assess the benefits of a voluntary scheme and the new burden which would be created under a compulsory scheme (under both Option 2 and 3) as well as the need to dovetail existing national schemes.
- Any EU Animal Welfare labelling scheme must be based on objective measures and not subjective or emotional ones. These objective measures must be based on scientific and agronomic evidence, measurable and easily applicable for the whole agri-food chain. The scheme must not focus on a single indicator, but rather the cumulative impact of factors in order to properly represent the level of welfare of farmed animals.
- We would also highlight the need to incorporate digital communication tools within the labelling scheme considerations (under Option 2 and 3), for example the use of a QR code for consumers to access further information on audits etc.
- Finally, under Option 2, there should be recognition for pasture-based farming production (as an alternative to or step above non-caged) to better communicate the specific farming practices applicable.