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Attn:

Executive Vice-President
Valdis Dombrovskis,

São Paulo, 08th September, 2022

Dear Executive Vice-President Valdis Dombrovskis,

On 22 April, Animal Equality in partnership with Eurogroup for Animals, gathered 68 civil society organizations and animal welfare specialists from Mercosur countries to discuss how animal welfare can contribute to environmental protection if meaningfully included in the EU-Mercosur Free Trade Agreement (FTA).

The main finding of the event was that, as it stands, this FTA will jeopardize the objectives of the EU's Green Deal. Indeed, the FTA will fuel the animal farming industry, which is one of the key sectors responsible for the climate emergency, biodiversity loss and the spread of zoonotic diseases. Respecting animal's rights should be a priority to promote global sustainability if we seek to make any progress in the global effort to neutralize the climate threat and to prevent future public health crises.

Mercosur governments have been defending vehemently that animal-protein product exports will increase their Gross Internal Products (GIP) and will positively affect the economy. However, indicators are pointing to the growing deterioration of these countries' ecosystems, and government policies haven't been enough to mitigate the damage and assure minimal standards of animal wellbeing. Large companies and farms receive government subsidies unconditionally, even when environmental crimes are committed, such as deforestation of protected areas and systemic animal abuse. These companies are financed by taxpayer's money and damage native societies as these communities are harshly affected by the destruction of their ecosystems and must face precarious sanitary conditions. Farmed animals are the most affected beings in this whole process because, besides being slaughtered, they live their whole lives with elevated and unnecessary levels of pain and suffering.

Animal welfare should thus be a key component of any trade agreement as it encompasses human and animal wellbeing, both of which are codependent and require a

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balanced ecological environment. Therefore, the EU and Mercosur countries have the moral responsibility to establish correct precedents for other trade agreements and international cooperations to come.

This letter presents a summary of the main topics discussed by experts during the conference. The undersigned animal rights experts and environmental protection representatives strongly request members of the European Parliament, the European Commission, and Member States to adopt measures seeking to curb the negative impacts that could be caused by the FTA in Mercosur countries on animals, biodiversity, and the environment.

The below themes were discussed by expert panelists in the conference and are endorsed by all signatories of this letter.

1. Subsidies should only benefit sustainable food systems: We suggest the creation of a verification mechanism to guarantee that subsidies are offered to the animal-based food sectors where investments are directed to sustainable activities and can guarantee animal welfare standards compatible with the EU's requirements. The food production systems must be aligned with the UN's Sustainable Development Goals (SDGs) and must be consistent with the Green Deal and Farm to Fork strategy. This means that subsidies should be granted only to food production systems that respect the environment and have high animal welfare standards. Indeed, in the 43th session of the UN Committee on World Food Security (CFS) animal welfare was included as objectives to be achieved by UN member states in the global fight against malnutrition, because of its role in the development of sustainable agriculture and food security. To make this a reality, it's essential to develop cooperation mechanisms so we can reach full transparency inside the food supply chain and align our definition of sustainable food production systems.

2. Regulatory alignment and sanctions to compensate legislative asymmetry: Proposing the adequate use of subsidies and implementing transparency mechanisms inside the animal farming supply chain won't be enough if there are no guarantees that sanctions will be imposed when the Mercosur countries do not comply with animal and environmental protection requirements put in place by the EU. Clear minimum criteria to respect should be included in the trade agreement, and it must be made clear which sanctions will be used when infractions are committed, and that actions will be taken swiftly.

3. Increase the transparency in the food supply chains: To secure accountability and radical transparency in the animal-based products supply chain, it's imperative to adopt measures such as monitoring systems and improvement of inspection in farms and slaughterhouses, more severe punishments for those responsible for environmental crimes and animal abuse, and better monitoring of the use of antibiotics as growth promoters during production. The animal farming industry in Mercosur countries is known for the practice of deforestation to open

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pastures, uneven land distribution, monocultures of corn and soy, and the use of extremely cruel and painful practices with farmed animals such as the use of crates in pig farms and the use of cages to breed hens. Although international trade has the potential to improve the accomplishment of the SDGs, a global research showed that trade improved the rating of the SDGs by 65% in high-income countries, but it reduced by more than 60% in the group of medium and low-income countries, including Brazil. This asymmetry is morally condemnable in a moment where humanity is agonizing in the face of an imminent catastrophe.

Additionally, we recommend the adoption of animal welfare assessments in the food production systems, such as the 'Cumulative Pain' metric proposed by the Welfare Footprint Project (<https://welfarefootprint.org/book-laying-hens/>). This mechanism measures how much time of pain in various intensities animals experience over a lifetime. Intensive farming causes chronic stress for billions of animals. As a consequence, cortisol, the hormone released in large quantities in the nervous systems of animals submitted to intensive farming, has anti-inflammatory properties in small amounts, but over time, in larger quantities, it can trigger inflammatory responses, inhibiting the body's defense mechanisms and creating a breeding ground for diseases.

4. Adoption of security protocols: Two types of security protocols must be adopted by the EU and Mercosur, one on environmental security and another on biosecurity.

Environmental security protocols are necessary because there are no preventive or corrective mechanisms in Mercosur countries to protect the ecosystems and the living beings in case of environmental disasters. Governments must work seriously, alongside civil society which has been a tireless agent of damage mitigation in those countries on the implementation of such mechanisms, especially when farmed and wild animals are involved. There is also the need to consider the occurrence of accidents, sanitary issues and criminal activities inside the farms or risks to surrounding ecosystems due to the misuse of animals (dead or alive) disposal techniques.

When it comes to biosecurity protocols, two main points stand out. The first one is the control of antibiotics on intensive animal farming. Although in the EU there are regulations about the use of antibiotics as growth promoters, in Mercosur countries this control is still weak, and both usage and misuse are widespread. Brazil ranked 2nd among the top users of antimicrobials for veterinary use. This factor diminishes the positive effects of measures adopted in the EU, contributing to the increase of antimicrobial resistance (AMR) worldwide. Such a problem is especially true when we consider that, despite European legislation, imported animal-protein products come from animals raised in systems highly dependable on antibiotics. Even when producers claim not to use antibiotics as growth promoter agents, it's possible that doses are increased with a prophylactic or metaphylactic treatment objective. Therefore, the usage of the medications continues to be widespread.

The second main point regarding biosecurity that needs to be highlighted is pathogen control of zoonoses. While animal farming advances into protected areas, the risk of exposure to pathogens unknown to science increases exponentially. The risks are higher in the Brazilian

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Amazon Forest and in the Brazilian Cerrado. The EU-Mercosur FTA would implement an expert committee to guide its Member States on sanitary questions, but it is not enough. The anticipation and implementation of preventive and corrective measures are required to stop the outbreak of new epidemics and pandemics.

Studies show that animals raised in confinement have lower immunity and are more susceptible to diseases. In these conditions several factors assist the rapid rise of illnesses: the genetic uniformity due to artificial selection aiming at choosing the most “productive” breeds and lineages; the number of animals packed in the same crowded space; the precarious sanitary conditions of these housing facilities; antimicrobial resistance; and the circulation of people among several production facilities and their proximity to wild animals. The animal farming production system is a ticking time bomb that risks causing health issues worldwide. Even so, public awareness about these risks in Mercosur countries is very low. For this reason, at this event, renowned researchers, politicians, and activists, highlighted that while there is an increasing demand for cheap animal proteins, there aren’t simple solutions for such a complex issue. However, the EU has the capacity to help Mercosur countries to foster more just, sustainable, and safe production methods, while also reducing animal suffering, as long as the FTA provides strong cooperation mechanisms and conditional market access for animal products.

5. Transferring technological and technical know-how: A positive consequence of the economical integration is the transfer of technology. The EU and Mercosur could set a cooperation aiming at the implementation of a monitoring system to increase transparency in the supply chain. Another example would be the diffusion of in-ovo sexing technologies and the reduction of regulatory barriers, so Mercosur countries are able to use them to reduce the unnecessary and cruel culling of chicks.

6. Stimulus to the betterment of animal wellbeing: The disparities in the animal welfare standards between Mercosur and the EU not only harm the environment and biodiversity, but can also provoke a medium to long-term deterioration of animal welfare achievements in the EU, due to competition faced by European producers, which might be forced to reduce their investments on animal welfare to be competitive. Although the FTA doesn’t address this problem, we urge the implementation of an international cooperation mechanism to improve animal welfare standards in Mercosur countries and a plan, with a 10-year goal, to reach EU standards. Two examples to illustrate the possibilities of such cooperation could be the incentive to adopt the Better Chicken Commitment or the European Chicken Commitment and the joint effort to ban cages for all farmed animals in line with the EU’s commitment.

7. Incentives to new food production systems: The last red flag raised by the experts in the conference was about stimuli to the growth of animal-protein food systems. In this respect, the EU-Mercosur FTA will contribute to the aggravation of the climate crisis. We urge that drastic measures are taken to reverse this tendency, because besides worsening the environmental situation, the increase in production contributes to water and food shortages in Mercosur

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countries, rendering the population even more vulnerable. This report from FAO and UNDP warns of this particular issue and points out the advantages resulting from stimulation of food production systems that restore the planet, instead of destroying it, and guarantees healthy and sustainable food to all. Amid an economic crisis, exacerbated by the pandemic, it is immoral to support a food production system that contributes to the suffering of billions of animals while being inaccessible to the majority of people on the planet. In this manner, it is necessary to transition to plant-based food systems, mycoprotein and lab-grown meat, which are more sustainable options for the environment and for animals.

Considering the above, politicians and decision makers from the EU have the unique opportunity to change the course of history and to contribute to mutual respect, as well as respect for animals and ecosystems in order to significantly reduce the speed with which we are all moving towards a global catastrophe.

We cannot afford to postpone a transition towards sustainable food systems any longer. Short-term economic, political or diplomatic goals must not overshadow the urgency to act in favor of global security, wellbeing and prosperity.

Cordially,

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