



Animal Welfare.
Worldwide.



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Working Party of Chief Veterinary Officers

Our contact:

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Regarding the CVO meeting 25-28 April in Varberg

Dear members of the Working Party of Chief Veterinary Officers

We are contacting you regarding the CVO meeting on 25–28 April in Varberg, Sweden. The meeting has the theme of sustainability and will address current issues in the fields of animal health, animal welfare and food safety. Animal welfare is an important part of sustainability and is of a very high relevance right now with the ongoing revision of the EU's common animal welfare legislation. With this in mind, we would like to encourage you to address the following topical and important issues at the meeting and as the influential actor you are, actively participate in the ongoing legislative process with the best interests of animals in mind. We would also like to invite you to a meeting where we can discuss these issues further together.

A reduced meat consumption and higher welfare for safe and sustainable food production

The Farm to Fork Strategy¹ states that “Moving to a more plant-based diet with less red and processed meat and with more fruits and vegetables will reduce not only risks of life threatening diseases, but also the environmental impact of the food system” and further that “Better animal welfare improves animal health and food quality, reduces the need for medication and can help preserve biodiversity. It is also clear that citizens want this.” The recently published report "Unveiling the Nexus: The Interdependence of Animal Welfare, Environment & Sustainable Development" highlights how stronger animal welfare can help address global crises and accelerate sustainable development.²

A reduced meat consumption, especially of meat from animal categories such as poultry, fish, and pigs, that do not contribute to biodiversity or other sustainability gains, is necessary for several reasons. With fewer animals, in farming systems that are more responsive to their needs, there is potential for increased animal welfare, throughout the life of the animal, including at slaughter.

Fur Free Europe

Numerous scientific studies have extensively pointed out that the complex behavioural needs of wild animal species, such as foxes and mink, the main species that are farmed for fur, cannot be met in fur farms.³ Numerous outbreaks of SARS-CoV-2 on mink farms as well as a recent case of HPAI have evidenced unpredictable public health risks associated with this intensive farming practice. Fur production has adverse impacts on the environment. Waste from fur farms directly impacts local soil, waterways, and air quality. Furthermore, the use of various toxic chemicals for the processing of hides has severe consequences for the environment.⁴ Alien invasive species are recognized as one main threat to biodiversity globally and cause immense economic costs.⁵ In Europe various alien invasive species such as American mink, raccoon dog or muskrat were introduced by the fur industry and/or escaped from fur farms causing significant adverse impacts on European native wildlife.

For these reasons, we support the European Citizens' Initiative (ECI) Fur Free Europe⁶ that calls on the EU Commission to propose laws prohibiting, throughout the Union, the:

- Keeping and killing of animals for the sole or main purpose of fur production.

¹ https://food.ec.europa.eu/system/files/2020-05/f2f_action-plan_2020_strategy-info_en.pdf

² <https://wfa.org/wp-content/uploads/2023/03/Unveiling-the-Nexus-The-Interdependence-of-Animal-Welfare-Environment-Sustainable-Development.pdf>

³ Eurogroup for Animals (2021) White paper No Animal Left Behind: [The need for a new Kept Animals Regulation](#)

⁴ Heather Pickett BSc (Hons) MSc (2021): “Respect for Animals. The environmental cost of fur”. Pages 20-26, https://respectforanimals.org/wp-content/uploads/2021/11/ENVIRONMENT-REPORT-NOV-2021_FINAL_LO-RES_SINGLES.pdf

⁵ <https://www.iucn.org/our-work/topic/invasive-alien-species>

⁶ <https://www.eurogroupforanimals.org/fur-free-europe>

- Placement of farmed animal fur, and products containing such fur, on the EU market.

The initiative recently closed after collecting over 1.7 million signatures in less than ten months. It is now time for the European institutions to act on that call.

End the Cage Age

There is a need for a ban on keeping animals in cages, in line with the successful End the Cage Age citizens' initiative.⁷ The European Commission has made a clear commitment to the phasing out of cages, and they need to be reminded of this and asked to deliver on their commitments. The ban should cover all animals such as chickens (including laying hens), quails, ducks, geese, rabbits, calves in solitary pens and confined pigs. The EFSA⁸ has recently concluded that gilts and sows should be permanently kept in groups. Hence, gestation stalls and conventional farrowing crates should no longer be used. For laying hens, the EFSA has also in a newly published opinion⁹ clearly indicated that cages no longer should be used.

Many producers, retailers and food manufacturers across the EU have already embraced society's call to End the Cage Age. Analysed scientific evidence and practical experiences of producers point to the conclusion that the majority of cage systems can undergo a sustainable transition within three to five years.¹⁰

We call for:

- A ban on keeping animals in cages, in line with the End the Cage Age citizens' initiative.
- A transition period of maximum five years.

Fish welfare

Since fish in the statistics are counted in tons, not individuals, we do not know the number of fish raised and slaughtered in aquaculture each year. Globally, it is estimated to be 50–150 billion fish per year, compared to around 70 billion chickens, pigs, and other terrestrial animals slaughtered worldwide each year. Today it is well established that fish can feel pain

⁷ <https://www.endthecageage.eu/>

⁸ EFSA Panel on Animal Health and Welfare (AHAW) (2022) Welfare of pigs on farm. EFSA Journal 2022;20(8):7421 <https://www.efsa.europa.eu/sites/default/files/2022-08/EFS2-7421.pdf>

⁹ EFSA Panel on Animal Health and Animal Welfare (AHAW) (2022) Welfare of laying hens on farm. EFSA Journal 2023;21(2):7789 <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2023.7789>

¹⁰ Eurogroup for Animals (2023) [Phasing out cages in the EU: The Road to a smooth transition](#)

and suffer.^{11, 12, 13} Yet they are often treated as if they were emotionless beings. These are undomesticated species kept in new and evolving production systems, reflected in mortality rates of 15 – 20% during the grow out phase.^{14, 15} That is a lot of suffering, and it is also a large waste of resources, especially feed already used, with farmed fish often being 2+ years old.

One reason why fish farming is a growing production is that the oceans are becoming increasingly overfished. Furthermore, aquaculture of piscivore species such as seabass and salmon require animal feed partly made from wild-caught fish. When considering the fish welfare and environmental footprint of a farmed fish one has to take account of the cumulative implications both for the fish used as feed, that suffers, and the farmed fish itself.

In fish farms, the needs and welfare of the fish are compromised in terms of opportunities for natural behaviour, risk of injuries and diseases, stress and pain associated with handling and transport and absent or painful and ineffective stunning at slaughter.

Fish in aquaculture are covered by animal welfare legislation at EU level, but there are no detailed rules, only general statements. Fish in wild catch fisheries have no welfare regulation or market incentives at EU level.

We call for:

- Species-specific regulation for the keeping and handling of fish in aquaculture. The legislation should cover the entire life of the fish, including transport and slaughter.
- Fish welfare of wild caught fish needs to be addressed – a first step would be to acknowledge the issue, and facilitate research and development for improved animal welfare, either through the Common Fisheries Policy (now being considered in the European Council) or the animal welfare legislative review.

Live animal transport

Despite regular scandals, animals are still transported in totally unacceptable conditions for days, weeks, months – both within the EU and to countries outside the Union. The repeated

¹¹ Chandroo K. P. et al. (2004) Can fish suffer?: perspectives on sentience, pain, fear and stress. *Applied Animal Behaviour Science* 86: 225–250.

¹² Sneddon L. U. (2003) The evidence for pain in fish: the use of morphine as an analgesic. *Applied Animal Behaviour Science* 83: 153–162.

¹³ Broom D. M. (2001) Evolution of pain. I Pain: its nature and management in man and animals, red. Soulsby, Lord and Morton, D. Roy. Soc. Med. Int. Cong. Symp. Ser., 246: 17–25.

¹⁴ <https://www.eurogroupforanimals.org/news/staggering-mortality-rates-reveal-significant-health-and-welfare-challenges-norwegian-fish>

¹⁵ Muniesa A., Basurco B., Aguilera C., Furones D., Reverté C., Sanjuan-Vilaplana A., Jansen M.D., Brun E., Tavornpanich S. (2020) Mapping the knowledge of the main diseases affecting sea bass and sea bream in Mediterranean Transbound Emerg. Dis., 67 (2020), pp. 1089-1100, 10.1111/tbed.13482

and very serious incidents at sea^{16, 17, 18} and on the roads¹⁹, have shown that live exports cause enormous and unnecessary suffering to millions of animals.

The long, distressing transport of animals must end. We call for:²⁰

- A ban on live animal export to countries outside the EU.
- A maximum permitted transport time of 8 hours for adult cattle, sheep and pigs, and 4 hours for poultry and rabbits.
- A ban on transport of animals for which 40 percentages or more of the expected gestation period has already passed, animals that have given birth in the eight weeks prior to the expected transport, as well as unweaned calves, lambs and goat kids under 12 weeks.
- A ban on animal transport by sea.
- The development of a strategy to ensure a shift from the transport of live animals to trade in meat and carcasses and genetic material.

Slaughter

At slaughter, it is essential that animals are subjected to minimum possible suffering. Part of this is that animals are stunned before bleeding and that the stunning method does not cause suffering. Several of the most common stunning methods used today have serious animal welfare shortcomings.

Carbon dioxide stunning of pigs causes severe discomfort and suffocation.²¹ Already in 2004, EFSA pointed out that the gas used for stunning should be non-aversive and that research to find other better gas mixtures was a high priority.²¹ In 2020 EFSA reaffirms that carbon dioxide stunning of pigs at slaughter poses a serious animal welfare problem and must be replaced by other methods. Carbon dioxide gas is highly aversive and causes pain, fear, and respiratory distress to pigs.²²

In some countries, like Sweden, fish are also stunned by carbon dioxide, despite the fact that the method causes great discomfort and stress to the fish and the method is also ineffective.²³

¹⁶ <https://www.eurogroupforanimals.org/library/summary-accountability-report-karim-allah-and-elbeiks-crises-animal-welfare-during-sea>

¹⁷ <https://www.eurogroupforanimals.org/news/what-suez-canal-crisis-meant-animals-and-eu-regulations>

¹⁸ <https://www.eurogroupforanimals.org/news/cause-capsizing-livestock-vessel-queen-hind-still-unknown>

¹⁹ <https://www.eurogroupforanimals.org/news/latest-live-animal-transport-investigation-reveals-suffering-two-week-old-calves>

²⁰ Eurogroup for Animals (2021) [White paper Live animal transport: time to change the rules](#)

²¹ EFSA (2004) Opinion of the Scientific Panel on Animal Health and Welfare (AHAW) on a request from the Commission related to welfare aspects of the main systems of stunning and killing the main commercial species of animals. EFSA Journal 2(7): 45.

²² EFSA Panel on Animal Health and Welfare (AHAW) (2020) Welfare of pigs at slaughter. Scientific opinion adopted 20 Maj 2020. EFSA Journal 2020;18(6):6148.

²³ EFSA (2004)

A common stunning method at poultry slaughter is the water-bath stunning. The process of live shackling is painful and distressing, especially for those individuals whose legs were already in pain.^{24, 25} The method involves a risk that the animal is not sufficiently stunned and therefore scalded alive. Since 2004, EFSA has recommended phasing out the use of the water-bath stunning, as it causes pain and stress to birds.²⁵

We call for:

- A requirement for stunning at all slaughter, without exception.
- Slaughter methods should be adapted to species and exclude methods that are known to be inappropriate for the species:
 - A ban on carbon dioxide pig and fish stunning.
 - A ban on poultry water-bath stunning.

We wish you a meaningful meeting with the needs of animals in focus in Varberg in April, and we hope that you would like to meet with us to discuss these issues further.

Yours sincerely,

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Reineke Hameleers, Director of Eurogroup for Animals

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Simone Montuschi, President of Essere Animali

Gianluca Felicetti, President of LAV, Italy

²⁴ Bedanova I. et al. (2007) Stress in broilers resulting from shackling. Poultry Science 86 (6): 1065–1069.

²⁵ EFSA (2004)