IFOAM Organics Europe's position paper on animal welfare practices and labelling

December 2023

IFOAM ORGANICS EUROPE
MAKING EUROPE MORE ORGANIC

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Executive summary

IFOAM Organics Europe supports the initiative of the European Commission to revise the animal welfare legislation when it comes to transport. IFOAM Organics Europe looks forward to forthcoming proposals on slaughter and labelling. While IFOAM Organics Europe welcomes a reduction of transport time for animals – many organic standards already go beyond the minimum standards – we ask **policymakers to consider that farmers cannot be held accountable for the low availability of organic slaughterhouses**.

In terms of labelling, IFOAM Organics Europe is in favour of a mandatory animal welfare label and for a system in which organic is ranked the highest given the legal basis that ensures high animal welfare standards in organic production. A model like the egg label, which was implemented by the European Union in 1999 under the method of production (MOP) labelling option, is easy to implement and clearly shows which agricultural production system contributes most and least to animal welfare.

Introduction

Organic farming is based on the four organic principles of ecology, health, care, and fairness, and promotes a farming system that takes a holistic, systemic approach. The EU organic regulation pays close attention to animal well-being and is regarded as an animal welfare best practice by civil society[1]. Indeed, the organic regulation states that "the observance of high standards for health, the environment and animal welfare in the production of organic products is intrinsic to the high quality of those products". Organic farming delivers on animal welfare standards and the EU legislation related to farm animals should go into this direction and build upon the legal requirements for organic and the best practices carried out in organic. Moreover, while the organic regulation provides a solid baseline for animal welfare, many organic operators go well beyond (please see annex II for more insights into organic private standards and animal welfare).

IFOAM Organics Europe welcomes the European Commission's initial intention of revising the EU animal welfare legislations as well as creating a European animal welfare label, thus reflecting the growing interest of society to improve animal welfare. **However, IFOAM Organics Europe regrets that currently the animal welfare package is solely focused on transport.**

While IFOAM Organics Europe welcomes a reduction of transport time for animals – many private organic standards already go beyond the minimum standards – we ask **policymakers to consider that farmers cannot be held accountable for the low availability of organic slaughterhouses**.

In terms of animal welfare labelling, IFOAM Organics Europe supports the creation of an animal welfare labelling system that puts forward adequate and species-specific animal welfare practices, in which the organic standard is clearly identifiable as a best practice. Organic farmers' efforts in terms of animal welfare should be recognised within a European labelling scheme as organic livestock farmers respect the integrity and well-being of animals to the extent possible. The organic food and farming movement would like to highlight the importance of a solution that keeps its focus on achieving higher animal welfare standards within the EU. To reach this goal, **IFOAM Organics Europe favours a mandatory method of production labelling within the EU for all animal species.**

This paper explores the political and societal context surrounding animal welfare, the benefits of organic farming systems in the context of animal welfare, as well as recommendations to policymakers regarding animal welfare and animal welfare labelling.

Context

Political context

Within the European Green Deal, the Commission states that "There is an urgent need to […] improve animal welfare". This call has been taken up by the published fitness check roadmap of Directorate General Health and Food Safety (DG SANTE) which *inter alia* calls to "assess the need […] [of an] EU regulatory framework for animal welfare labelling"[2]. During the German council presidency in 2020 the topic of an EU wide animal welfare labelling scheme gained further attention leading to the Council's support of an EU-wide animal welfare label[3] . While at first the Commission announced that it would publish several proposals on animal welfare including on labeling, slaughter and transport, at the end of 2023 it was clear that only a proposal on animal transport would be published.

In June 2021, the European Parliament (EP) published the 'Animal welfare on the farm – ex-post evaluation of the EU legislation: Prospects for animal welfare labelling at EU level' study. This study highlights the need for the revision of the EU legilsation on animal welfare which is considered outdated and does not address the current

[1] 'Organic production systems are also viewed by consumers as more welfare friendly, with higher standards of farm animal welfare than conventional livestock systems, and better for human health due to low or no use of chemicals.' Marta E. Alonso, José R. González-Montaña, and Juan M. Lomillos, Consumers Concerns and Perceptions of Farm Animal Welfare, 2020. Available here: Consumers' Concerns and Perceptions of Farm Animal Welfare - PMC (nih.gov)

[2] European Commission (2020): Fitness check of the EU legislation on animal welfare of farmed animals. Originally edited by Directorate General Health & Food Safety.

[3] Council of the European Union (12/15/2021): Council supports EU-wide animal welfare label. Available here.

animal welfare related needs. The effectiveness of the EU legislation on animal welfare is mixed[4]. Importantly, the existence of exceptions, derogations, vague requirements and large margins of interpretation have led to a distortion of competition and ultimately non-compliance.

Futhermore, the European Parliament approved the Committee of Inquiry into the protection of animals during transport (ANIT Committee)'s report and recommendations for the European Commission in January 2022. Firstly, the report highlights that Member States do not always comply with EU rules and these rules 'do not take into account the different transport needs of animals'. Secondly, Members of the European Parliament recommend to increase Member States' controls to check whether transporters comply with the EU animal welfare standards, when transporting, loading and deloading animals. The European Parliament also published its own initiative report on "on-farm animal welfare" in October 2021 which states the difficulty to properly analyse the implementation of the animal welfare legislation, and asks the Commission to update the directive with the view of clarifying, not tightening, the rules therein. Animal welfare groups have criticised the report as it supports controversial practices such as the production of foie gras.

Citizens' interest in animal welfare

Consumers positively associate the organic label with human health, the environment and animal welfare [5].
Regarding animal welfare specifically, initiatives such as The European Citizens' Initiative (ECI) 'End the Cage Age' reflect a growing concern within Europe to respect animal health and wellbeing, and to shift towards more ethical farming systems. Indeed, this initiative, presented by Compassion in World Farming and started in 2018, stated *'cages inflict suffering on enormous numbers of farm animals every year. They are cruel and unnecessary, as higher-welfare cage-free systems are viable'* and called the Commission to ban the use of '*cages for laying hens, rabbits, pullets, broiler breeders, layer breeders, quail, ducks and geese; farrowing crates for sows; sow stalls where not already prohibited; and individual calf pens where not already prohibited)'.* As this initiative collected more than 1 million signature, The Commission answered in June 2021 that *'the request to phase out cages is in line with current developments, as several Member States have already implemented total or partial bans on cages'.* In its answer, the Commission also affirmed that the Common Agricultural Policy (2023-2027) can play a role to support animal welfare via the new 'Eco-schemes' set in the first pillar and dedicated to support environmentally friendly measures. The Commission also stated that EFSA is developing further scientific assessments on cages for the species and categories of animals mentioned by the citizens' initiative (available in 2022 and 2023). Other ECIs that gathered more than a million signatures and therefore show citizens' interest in animal welfare are the ECI Fur free Europe[6] and the ECI Save Cruelty Free Cosmetics - Commit to a Europe Without Animal Testing[7].
IFOAM Organics Europe regrets that the Commission has so far not replied adequately, with legal provisions, to these successful ECIs.

[4] On the one hand, the study highlights the desirable structural changes that have occurred for laying hens, pregnant sows, and calves; but on the other hand, the General and Broilers Directive showed small impacts and the pigs directive also failed to achieve some of its objectives.
[5] See footnote 2
[6] ECI Fur free Europe, available here.
[7] ECI Save cruelty free cosmetics, available here.

Benefits of organic's systemic approach to animal husbandry

Benefits of organic animal husbandry for animal welfare are manifold and have been widely discussed in the scientific literature[8]. **Allowing animals to express their natural behaviours by giving access to outdoor areas and reducing stocking densities are core elements of organic animal husbandry, which guarantee higher animal welfare.** Putting welfare before productivity and thus focusing on breeding programs that balance productivity, longevity, adaptation to environmental conditions and conservation of biodiversity is part of the long-term vision in organic to increase animal welfare at farm level. While not a legal requirement per se, organic operators generally seek to strongly limit feed imports from outside of Europe as farmers must[9] use fodder directly from the farm itself or from an area close to the farm. This helps to breed robust animals and reduce the dependency on outside input.

Organic animal health management is based on disease prevention which facilitates the use of breeds that are adapted to local conditions and leads to a significant reduction in the use of antibiotics and other drugs in organic animal husbandry systems. The organic regulation assures that high animal welfare standards and species-specific behavioural needs are met. For instance, organic standards ensure regular outdoor access to open air areas and pastureland. Finally, through organic certification all these practices are regularly controlled, which assures high standards and credibility.

Organic Regulation production rules for housing practices

The EU Organic Regulation 2018/848 (annex II – Part II – Livestock production rules) lays down detailed production rules regarding the housing practices for organic animals which ensures that animals have access to outdoor spaces to express their natural behaviours as well as clean indoors areas with a stocking density adequate to their needs, no cages and suitable temperature and hygiene rules.

Specific production rules have also been elaborated for several animal species. For instance, the EU Organic Regulation 2018/848 also states 'poultry shall have access to an open-air area for at least one third of their life'. The EU Organic Regulation 2020/464 elaborated implementing rules regarding the stock density for each species (Annex I of the organic regulation – Rules on the stocking density and the minimum surface for indoor and outdoor areas for livestock as referred to in Chapter II. i.e. bovine, ovine, caprine, equine, cervine, porcine animals, poultry and rabbits).

Organic Regulation general requirements for slaughtering practices

Firstly, the Organic Regulation makes it clear that 'any suffering, pain and distress shall be avoided and shall be kept to a minimum during the entire life of the animal, including at the time of slaughter' (Annex II., Part II, 1.7.7). Furthermore, the use of 'any type of electrical or other painful stimulation to coerce the animals' during the loading and uploading of animals is prohibited (Annex II., Part II, 1.7.11).

Finally, all slaughtering practices should happen only at the most appropriate age of the animal and be carried out by qualified personnel (Annex II., Part II, 1.7.9).

Organic Regulation general requirements for transport

The EU Organic Regulation 2018/848 requires that 'the duration of transport of livestock shall be minimised' (Annex II., Part II, 1.7.6). As mentioned in the previous section, the use of 'any type of electrical or other painful

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[8] Bergman, M. A.; Richert, R. M.; Cicconi-Hogan, K. M.; Gamroth, M. J.; Schukken, Y. H.; Stiglbauer, K. E.; Ruegg, P. L. (2014): Comparison of selected animal observations and management practices used to assess welfare of calves and adult dairy cows on organic and conventional dairy farms. In Journal of dairy science 97 (7), pp. 4269–4280. DOI: 10.3168/jds.2013-7766.

+ Gade, Patricia Barton (2002): Welfare of animal production in intensive and organic systems with special reference to Danish organic pig production. In Meat Science 62 (3), pp. 353–358. DOI: 10.1016/S0309-1740(02)00123-7.

+ Hermansen, John E. (2003): Organic livestock production systems and appropriate development in relation to public expectations. In Livestock Production Science 80 (1-2), pp. 3–15. DOI: 10.1016/S0301-6226(02)00313-5.

+ Ivemeyer, S.; Smolders, G.; Brinkmann, J.; Gratzer, E.; Hansen, B.; Henriksen, B.I.F. et al. (2012): Impact of animal health and welfare planning on medicine use, herd health and production in European organic dairy farms. In Livestock Science 145 (1-3), pp. 63–72. DOI: 10.1016/j.livsci.2011.12.023.

+ Vaarst, M (2004): Animal health and welfare in organic agriculture. Wallingford: CABI.

[9] The organic regulation stipulates that "at least X (30-60-70 % depending on the species) of the feed shall come from the farm itself or, if this is not feasible or such feed is not available, shall be produced in cooperation with other organic or in-conversion production units and feed operators using feed and feed material from the same region."

stimulation to coerce the animals' during the loading and uploading of animals is prohibited (Annex II., Part II, 1.7.11). Finally, the personal involved in keeping and handling animals during transport and slaughter 'shall possess the necessary basic knowledge and skills as regards the health and the welfare needs of the animals' through adequate training (Annex II., Part II, 1.7.1).

Our recommendations for the revision of EU animal welfare legislations

Mutilation

Mutilations can be carried out for various reasons including to prevent unwanted behaviour in farm animals such as aggression[10] (dehorning), to identify the animal (ear tag or branding) or to prevent infection or tail biting (tail docking).

The organic movement believes that mutilations should be avoided where possible, taking into consideration local conditions. Organic operators strive, as much as possible, to allow animals to express their natural behaviours by giving access to outdoor areas and reducing stocking densities. Also, organic farmers strive to keep suffering at a minimum during the entire life of the animal. Some standards, such as the biodynamic federation Demeter international standard, prohibit mutilations altogether.

The organic regulation foresees that health, fitness, lifetime performance and nature of the animals and resistance, not high-performance efficiency, are at the heart of the choice of breeds and multi-purpose breeds can be used. For instance, using so-called dual-purpose chicks can prevent chick-culling[11]. On the contrary, overbred animals, which might be seen as more "efficient" by some, are often more susceptible to disease, and questionable in terms of animal cruelty. A notorious example is that of chicken that grow so fast that they are unable to walk[12].

As such, organic farmers tend to select species and breeds that do not require mutilations. Exceptions are allowed when suffering can be kept to a minimum, and surgical treatments should only be used for reasons of safety, mitigation of suffering and the health and welfare of livestock. More specifically, exceptions - and only a few types of surgical interventions - can be authorized by the authorities only in duly justified and notified cases (tail-docking of sheep, beak trimming undertaken in the first three days of life, dehorning or disbudding) and only on a case-by-case basis and when those practices improve the health, welfare or hygiene of the livestock or where workers' safety would otherwise be compromised. Exceptions can also be granted due to local conditions. For instance, in Nordic countries where livestock may be kept inside due to low temperatures, disbudding may be practiced to prevent cows from hurting each other due to increased stress and aggression.

In any case, **future EU legislation on animal welfare should ensure that mutilations are banned as general principle and are only allowed on a case-by-case basis when duly authorized and justified, also considering local conditions.**

More generally, as is the case for organic practices more generally, GMO-related techniques should not be used to limit mutilations, as genetic engineering techniques are not as precise and as predictable as they are sometimes presented. For instance, gene-edited dehorned cattle also were resistant to antibiotics[13]. Regardless of its purpose, whether the prevention of mutilations, resilience, or growth, genetic engineering is not compatible with the principles of organic farming.

Transport

Several private organic standards already provide rules for transport time and conditions. For instance, Bioland in Germany foresees that "the transport period should not exceed a maximum of 4 hours and the transport

[10] Nordquist et al., 2017. Mutilating procedures, management practices, and housing conditions that may affect the welfare of farm animals: implications for welfare research. Available here.

[11] Biodynamic federation, 2022. Let's give a future to male chicks. Available here.

[12] The Guardian, 2020. Fast food giant still "failing" on chicken welfare says report. Available here.

[13] Ecologist, 2019. FDA finds unintended antibiotic resistance genes in "gene-edited" dehorned cattle. Available here.

distance of maximum 200 km". Other organic private standards such as Soil Association, KRAV or Bio Suisse limit the transport time to 8 hours including breaks, taking into account the scarcity of organic slaughterhouses.
While IFOAM Organics Europe recognizes the importance of reducing transport time, European organic stakeholders face practical challenges as there are few certified slaughterhouses for organic products. **This situation is independent from farmers' control and farmers should therefore not be penalised for the lack of organic slaughterhouses nearby. In order to effectively reduce transport time for organic meat products, it is necessary to increase the number of local organic slaughterhouses** (also see section "slaughter" below)**.**
The consequences of this lack of organic slaughterhouses are that there might be long distances between the farm and the slaughterhouse. Some farmers may have to bring their animals to conventional slaughterhouses where animal welfare standards may be lower. Certain slaughterhouses specialise in the slaughter of only some species, and slaughter only e.g. cows and pigs. A farmer that has goats might need to travel even further to find a suitable slaughterhouse.

Moreover, IFOAM Organics Europe supports the inclusion of species-adapted maximum and minimum temperature limits, as well as levels of gas and humidity to enhance travel conditions for animals. The transport of un-weaned animals or unfit ones should be forbidden.

The European organic movement is in favour of transporting carcases and meat and thus banning the transportation to non-EU countries of live animal for slaughtering. Also, we believe that transport of living organic animals outside the EU should not be accepted, except for animals for breeding purposes, and except for when a non-EU country is a geographical neighbour of an EU Member State, and this non-EU country has the same animal welfare standards as within the EU.

Slaughter

Regarding slaughter, IFOAM Organics Europe favours approaches that are the least stressful for the animals, i.e. on-farm slaughtering or mobile slaughtering, as it has been shown that cortisol levels are 10 times higher in animals brought to slaughterhouses rather than animals slaughtered on farms[14].
However, while there are a few successful examples of **mobile slaughtering**, it is a costly practice that currently cannot be implemented easily and could therefore benefit of e.g. subsidies in order to further develop this practice.
On-farm slaughtering is supported both by private organic standards such as Nature et Progres[15], KRAV and Bio Suisse, by the Biodynamic Federation Demeter International, as well as by animal welfare NGOs such as Eurogroup for Animals[16] and Compassion in World Farming. On-farm slaughtering is the least stressful option for animals as they are not subject to transportation and remain in their familiar environment. However, on-farm slaughtering is also very costly with investments of about 1 million euros. Certain organic farmers have teamed up to reduce individual costs and buy an on-farm slaughterhouse for several organic farmers to use. This cannot always be done, be it for financial reasons, legal reasons or because of more practical matters. For instance, on-farm slaughterhouses are not allowed in Belgium, while in Czech Republic on farm slaughtering is allowed but only for three animals and only for household consumption. A cage is required for more than three animals, which is stressful for the animals. Farmers in other EU Member States, e.g. Sweden, are teaming up and using the wild slaughterhouse (which usually are only in use during hunting season from oct-jan) to reduce costs.

[14] Probst et al, 2017. Auswirkungen von Stressoren vor der Schlachtung auf Rinder bei zwei verschiedenen Schlachtmethoden. Available here.
[15] Nature et Progres, 2018. Abattage a' la ferme. Available here.
Nature & Progrès recommends:
- A mobile slaughtering for pigs and ovine animals;
- A hybrid system of on-farm slaughtering and mobile slaughtering to ensure the carcase are taken as soon as the slaughtering is done;
- The meadow shooting for bovine animals living in the field all along the year, given the transportation of these animals is a source of intense stress;
- The slaughtering in pens for bovine animals that are able to remain calm in pens, ensuring better hygienic conditions and limiting the possible of missing a shoot;
- The slaughtering in farm buildings for calm animals to ensure higher hygiene and security conditions.

[16] Eurogroup for Animals, 2021. Animal welfare at the time of killing and slaughtering. Available here.

Still, many organic farmers must rely on big, conventional slaughterhouses that also slaughter for organic where animal welfare may not be the highest, transport to the slaughterhouse may take several hours, and there have been instances where farmers were given older meat than the fresh meat they should have received.

As such, as stated above, **while IFOAM Organics Europe is in favour of reducing transport time for animals, organic farmers cannot be held accountable for the scarcity of (organic) slaughterhouses nearby their farms**. **Due to the lack of local slaughterhouses in some areas, there is a need for technical and financial support to develop the relevant slaughterhouse-related infrastructure, be it on farm, nearby, or through mobile slaughtering.** Also, while we welcome that in some countries such as Germany legislation allows for an increase in the number of cattle and pigs for on-farm slaughter, not only is a similar increase is also needed for pigs and goats, but more importantly, such legislation is needed in the EU as a whole, with support to farmers in order to implement this practice.

IFOAM Organics Europe believes that veterinarians should not necessarily be present at every slaughter given the high economic burden that this entails, but the slaughtering facility should be certified, including for animal welfare practices, and veterinarians should carry out unannounced visits to ensure that standards remain high. Another option, currently explored in Sweden, is to provide for veterinarian inspection of living animals before stunning online.

Animal welfare labelling

Organic farming, which opts for a systemic approach and places considerable importance on animal welfare, should be an integrated and central part of an animal welfare label.

Method of production labelling & the relation with organic

Using a method of production (MOP) labelling for all animal species offers a unique chance to improve animal welfare on a broad scale. This certification method is based on a certified method of production which is clearly described and controlled.

The MOP in the egg labelling scheme shows tremendous potential to initiate change in animal production systems. Using this system thus offers four main benefits, namely (1) high credibility (2) use of existing, tested, and certified EU scheme (3) high alignment with trade standards (4) possibility to be mandatorily enforced. Similarly, as already implemented for eggs, organic certification offers a possibility to set the premium standard in animal welfare for other animal-derived products. As expressed by Eurogroup for Animals, a leading animal welfare NGO, "organic farming should lead the way towards the EUs state of the art sustainable and humane food production mode"[17]. They also state that "the mandatory marking of eggs and the specifications laid out in the eggs marketing standards and the organic production rules have contributed to provide consumers with verified and verifiable information on animal welfare" [18].

In the case of the egg labelling system, the MOP with the ranking system of 0= organic, 1= free range, 2= barn, 3= cage has shown to allow a comparatively easy implementation and did not result into too many burdens on farmers. The highest animal welfare score is given to organic, which is controlled and certified.

While the method of production (MOP) labelling option led to a higher ranking for organic farming, this specialised labelling system did not enable to highlight the multiples benefits of organic farming to their fullest extent. Studies show that the knowledge about organic animal products could be improved not only by better highlighting its benefits in terms of sustainability, but also by promoting its positive externalities in terms of other attributes that are known to be highly valued by consumers such as animal welfare and nutritional content[19]. Therefore, an EU-wide labelling scheme bares the potential to make consumers fully aware of the benefits in organic animal husbandry systems.

[17] Eurogroup for Animals, 2021. "Organic Action Plan: what it could mean for animal welfare". Available here.

[18] Eurogroup for Animals, 2020. Animal welfare and food labeling: initiating the transition through high quality consumer information. Available here.

[19] Akaichi et al., 2019. Could animal welfare claims and nutritional information boost the demand for organic meat? Evidence from non-hypothetical experimental auctions. *Rural development & food marketing, Sustainable Ecosystems*. Available here.

Recommendations for an EU animal welfare label

IFOAM Organics Europe would hereby like to provide some recommendations regarding an EU wide animal welfare label:

- The implementation of **a mandatory animal welfare label** would have higher impact on animal welfare practices than voluntary labelling. Indeed, given voluntary approaches are mainly used in Member States with high animal welfare standards or on-going private certification schemes, it would confuse consumers and reach less market penetration. Navigating through labels is not an easy task for consumers and understanding the underlying principles of labels is paramount to take an informed decision. In addition, a voluntary label would have a more limited impact, and the practicability of enforcement as well as the financing of controls are questionable.
- **This label should cover retail, processed foods and the out of home food sector**.
- **The ranking system from 0 to 3** used in the egg labelling can be relevant as it is easy to implement and already known by consumers. The first level of the ranking system needs to be high enough to obtain significant changes regarding animal welfare. **Organic farming practices should be awarded the highest score**, consistently with the high animal welfare obtained through these practices. It is important not to put in place additional certification and control of organic farms as this would inevitably result in a higher burden for organic farmers which already comply with high animal welfare standards.
- **Transport and slaughter should be excluded** from this MOP labelling as they do not directly refer to the production of husbandry and are out of farmers' hands and control.
- **Organic farmers should not suffer extra costs** given that they already comply with the organic certification.

Conclusion

IFOAM Organics Europe welcomes the first step taken by the European Commission to improve animal welfare through a revision of the rules on transport and recognizes the importance of reducing transport time. While IFOAM Organics Europe is in favour of reducing transport time, it is important to consider that European organic stakeholders face practical challenges as there are few certified slaughterhouses for organic products. This situation is independent from the farmers' control and farmers should therefore not be penalised.

As such, due to the lack of local slaughterhouses in some areas, there is a need for technical and financial support to develop the relevant slaughterhouse-related infrastructure, be it on farm, nearby, or through mobile slaughtering.

Also, the positive impact of organic practices on animal welfare should be recognised, both within the animal welfare legislation, as well as for the animal welfare label. For the latter, organic practices should appear as scoring highest in a future EU-wide animal welfare label.

Annex I – The EU Organic Regulation 2018/848 (Annex – Part II – Livestock rules production)

- 1.6.1: 'Insulation, heating and ventilation of the building shall ensure that air circulation, dust level, temperature, relative air humidity and gas concentration are kept within limits which ensure the well-being of the animals. The building shall permit plentiful natural ventilation and light to enter.'
- 1.6.2 'Housing for livestock shall not be mandatory in areas with appropriate climatic conditions enabling animals to live outdoors. In such cases, animals shall have access to shelters or shady areas to protect them from adverse weather conditions.'
- 1.6.3: 'The stocking density in buildings shall provide for the comfort, well-being and species-specific needs of the animals, and shall depend in particular on the species, the breed and the age of the animals. It shall also take account of the behavioral needs of the animals, which depend in particular on the size of the group and the animals' sex. The density shall ensure the animals' welfare by providing them with sufficient space to stand naturally, to move, to lie down easily, to turn round, to groom themselves, to assume all natural postures and to make all natural movements, such as stretching and wing flapping.'
- 1.6.8 'Cages, boxes and flat decks to raise livestock shall not be used for any livestock species'
- 1.7.3 'Livestock shall have permanent access to open air areas that allow the animals to exercise, preferably pasture, whenever weather and seasonal conditions and the state of the ground allow, except where restrictions and obligations related to the protection of human and animal health have been imposed on the basis of Union legislation'
- 1.7.4 'The number of livestock shall be limited with a view to minimising overgrazing, poaching of soil, erosion, and pollution caused by animals or by the spreading of their manure'

ANNEX I

RULES ON THE STOCKING DENSITY AND THE MINIMUM SURFACE FOR INDOOR AND OUTDOOR AREAS FOR LIVESTOCK AS REFERRED TO IN CHAPTER II

Part I: Stocking density and minimum surface for indoor and outdoor areas for bovine animals, ovine animals, caprine animals and equine animals as referred to in Article 3

1. Bovine animals

	Indoor area (net area available to animals)		Outdoor area (exercise area, excluding pasture)
	Live weight minimum (kg)	m²/head	m²/head
	Up to 100	1,5	1,1
	Up to 200	2,5	1,9
	Up to 350	4,0	3
	Over 350	5 with a minimum of 1 m²/100 kg	3,7 with a minimum of 0,75 m²/100 kg
Dairy cows		6	4,5
Bulls for breeding		10	30

Annex II – Going beyond the EU organic regulation: examples of organic private standards & animal welfare

Soil Association (SA)

The-UK based organic **Soil Association label** is guided by the EU Organic Regulation 2007 and 2008, but also **set higher standards** related specifically to animal welfare:

- SA sets higher standards regarding **the use of treatments and antibiotics.** The use of 'critically important antibiotics is restricted' and can be used only when no other treatment would be effective. Organophosphorus, organochlorine and colistin are also prohibited. You must not feed your calves milk taken from dairy cows during the statutory withdrawal period for antibiotic treatments.
- Regarding **the living conditions,** SA sets for instance space requirements for pigs' shelters to ensure they have enough space to rest and lie down. The livestock should not be routinely tether over long periods, including cattle on smallholdings.
- Regarding **feed**, SA requests that 'for herbivore species, at least 60% of their daily diet on a dry matter basis must consist of fresh or dried fodder, roughage or silage. This must not be reduced below 60%, even during the first few months of lactation.'

Bioland

The Germany-based organic **Bioland label** also sets high animal welfare standards compared to the organic regulation:

- **Specific space requirements and stocking density** have been set to ensure adequate living conditions for the needs of each species. For instance, laying hens are limited to the number of 6 per meter square. 'Barns with fully perforated floor area (fully slatted floors, flat decks, cages) are not permissible'.
- Regarding **living conditions,** Bioland requests for instance that 'In winter the possibility of regular movement in the open-air run should also be afforded'. Regarding the tether and subject to the permission of the competent authorities, 'tethering system for small holdings is possible provided the cows have access to pastures during the grazing period and at least twice a week access to open air run when grazing is not possible'. The tethering of sows is not authorized by Bioland[20].

Bio Suisse

The Switzerland-based **BioSuisse label** sets high standards for animal welfare, in addition to the ones set under the EU Organic Regulation[21].

- Regarding **the living conditions,** barns with perforated floor area are forbidden by Bio Suisse. Electric tethers for cows are forbidden. Materials used in stables must be inoffensive for animals.
- The use of antibiotics in prevention of a disease is forbidden. The administration antibiotics or medicine must be prescribed by a veterinary.
- For the **feed,** Bio Suisse sets a list of requirements to define what feed is authorized and when. For instance, products of dry milling and husking from Swiss processing: bran of wheat, degraded oat flour, spelled and oat husks, spelled and oat glumes, as well as their mixture. Regarding the **milk**, young bovine and horses

[20] Other Bioland travel-related requirement for specific species:
'Ruminants
- the transport plane shall be sprinkled in
- milk-yielding animals are to be milked before loading
- careful loading and unloading
- sexually mature male animals must be transported separately from female animals of the same species.
Pigs
- the transport plane shall be sprinkled in
- careful loading and unloading (e.g. drive shields and fences for guiding)
- if possible driving from darkness to brightness
- separation by fattening groups and origins, in case of common transport use dividing walls
Poultry
- dark boxes, sufficiently aerated and high enough'.

[21] BIOSUISSE, Cahier des Charges (FR), Directe Générale pour la Production animale, page 128, available here.

must be fed with milk (preferably maternal one) until the age of three months, young ovine and goats until the age of 35 days, and young pork until the age of 42 days.

KRAV

Swedish KRAV has had animal standards more than 30 years, prioritizing the expression of natural behaviour and the prevention of health issues. Some examples:

- KRAV forbids to treat farm animals routinely or preventively with veterinary medicinal products or chemical pesticides
- Examples for pigs:
    - Pigs must be outdoors most of the day, during a continual period of at least four months during the grazing period, on land that is mostly covered with vegetation.
    - Pigs must have feed and an abundance of opportunities for activity.
- Examples for cows:
    - Regularly monitor these key performance indicators: suckling calf mortality 0-24 hours, calf mortality 1-60 days (heifer calves), calf mortality 2-6 months (heifer calves) • young animal mortality 6-15 months (heifers), cows that die a natural death or are euthanized, total loss (cows) (not live), total number of cases of illness reported for cows, mastitis and leg diseases (cows).

The work of IFOAM Organics Europe on this topic is co-financed by the LIFE programme of the European Union, under the under the Climate, Infrastructure and Environment Executive Agency (CINEA). This publication only reflects the views of the authors, and its sole responsibility lies with IFOAM Organics Europe. CINEA is not responsible for any use that may be made of the information provided.