

Views and comments of the Netherlands on the inception impact assessment on the revision of the EU legislation on animal welfare

The Netherlands welcomes the initiative of the European Commission to evaluate and revise the current EU animal welfare legislation and will actively participate in this process. Therefore, the Netherlands thanks the Commission for the opportunity to react to the inception impact assessment on the revision. Our suggestions and questions are listed below. For questions, we are at your disposal.

Under A. Context, Problem definition and Subsidiarity Check

- **P1: Ad 'Context'**
It is mentioned under 'Context' that the revision of the EU animal welfare legislation will not cover any invertebrate animals.
The Netherlands thinks that inclusion of cephalopods and arthropods should be considered.
- **P2: Ad 'Problems the initiative aims to tackle'**
We would like point out that the breeding goals for higher productivity could not only have a negative impact on animals during transport, but also on animals in other situations (i.e. caesarean section as only option for birth or selection by number of offspring).

Under B. Objectives and Policy options

- **P4: Ad A) Animal transport**
Considering to include dynamic references to the IATA's Live Animals Regulations (LAR), to be able to work with the yearly updated version.
- **P5: Ad A) Animal transport – Cats and dogs**
Concerning requirements for dogs and cats, we wonder why the Commission suggests to restrict further EU requirements to transports of these animals and not extend it to the breeding and keeping, etc.
- **P6: Ad B) Animal welfare at farm level – Fur animals**
We miss the option(s) for the permanent prohibition of fur farming in the EU and would like to see those included.
- **P6: Ad B) Animal welfare at farm level - Animal welfare indicators**
Animal based welfare indicators can be useful to measure aspects of animal welfare. However, resource and management based measures and other necessary preconditions are also needed in the regulation, to ensure animal welfare and to ensure controllability and enforceability.
- **P7: Ad C) Animal welfare at the time of killing**
We miss approaches for policy options for:
 - Prohibition /phasing out shackling for live poultry (after a certain transition period, in light of scientific evidence, to reduce animal suffering);
 - Prohibition /phasing out non-stunned tilting for poultry (after a certain transition period to reduce animal suffering)
 - Slaughter speed. Option: be able to take risk-mitigating measures in the area of slaughter speed, such as lowering the slaughter speed structurally, if animal welfare is at risk (e.g. chasing animals)
- **P8: Ad D) Animal welfare labeling**
 - Please consider changing: *"The prevalence of few national standards over the others might contribute to contain uneven national requirements and a proliferation of schemes which would be detrimental to cross border exchanges. However, there is no indication that this is happening and that it would eventually properly address consumers' expectations."*
to: *"The differences in (national) standards that exist in labelling schemes within the EU can lead to unequal national requirements and complicate cross-border exchanges. In order to achieve a more level playing field, harmonization of animal welfare standards in labeling schemes at EU level is desirable. In addition, it would respond well to the expectations and needs of consumer markets."*
 - In addition, an important question is in what way the consumer could be informed on the difference in requirements between animal products produced in the EU and outside the EU.