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Opinion

Title **Impact Assessment for a Communication on Animal Welfare Labelling and the Establishment of a European Network of Reference Centres for the Protection and Welfare of Animals**

(draft version of 18 March 2009)

Lead DG **SANCO**

1) Impact Assessment Board Opinion

(A) Context

This impact assessment provides the background for an inter-institutional debate on animal welfare labelling. The related Communication is a follow-up to the Community action plan on the protection and welfare of animals 2006-2010 and Council conclusions of May 2007. It is presented in parallel with the Communication on agricultural product quality (2009/AGRI/003).

The IA is split into two parts, dealing respectively with animal welfare labelling and with the creation of a European Network of Reference Centres for the protection and welfare of animals (ENRC). The aim of the animal welfare labelling initiative is (i) to enable consumers to make informed purchasing decisions and (ii) enable producers to benefit from market possibilities, resp. give economic incentives to producers to improve animal welfare. The ENRC initiative would address the lack of harmonised animal welfare standards and the lack of coordination between existing Community and public bodies dealing with animal welfare related issues.

Concerning ENRC, the report states that the creation of such a Network is suggested by the Community action plan on the protection and welfare of animals 2006-2010.

(B) Positive aspects

The report is written in clear language and is accessible for non-specialist readers.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance. Some more technical comments will be transmitted directly to the author DG.

General recommendation:

The report needs to be substantially rewritten to clarify whether the initiative is purely a consultation or whether it will already identify a policy line, and against that background examine whether a Communication is the most appropriate instrument. It should be more explicit about the actual objectives of this initiative (i.e. consumer information versus animal welfare), and should broaden the set of options it examines beyond the proposed animal welfare labelling and the European Network of Reference Centres. It should be more explicit on the expected impact of the options for various types of stakeholders, and on the implications for third countries. During the IAB meeting, DG SANCO agreed to make the necessary changes in the impact assessment on this basis.

In the light of these recommendations, the Board would like to examine a revised Report, on which it will issue a new opinion.

(1) The report should clarify whether or not the initiative will contain new steps in policy development compared with the Community action plan on the protection and welfare of animals 2006-2010. It should also clearly indicate whether the objectives are limited to improved consumer awareness and elimination of market imperfections rather than improving animal welfare standards. Against this background, the report should examine whether a Communication is the most appropriate instrument for this initiative rather than, for example, a Green Paper. The report should state explicitly that at this stage no choice of a preferred option is foreseen, and confirm the commitment to carry out a full impact assessment before that choice is made. It should state explicitly that neither raising animal welfare standards nor improving compliance with the existing standards is among the objectives of this initiative. The report should provide evidence for the existence and a proper analysis of the causes and the importance of the alleged market imperfections.

(2) The report should develop a broader set of options for communicating information on animal welfare to consumers and promoting the exchange of information and greater coordination as alternatives to animal welfare labelling and the European Network of Reference Centres. The report should explicitly describe the 'combined option' that emerges as the preferred one for the ENRC as a separate option, and assess the expected impacts in comparison with the other options and the baseline. It should also consider information campaigns or the introduction of animal welfare criteria in existing or future product quality labelling schemes (e.g. on organic farming) as independent policy options. It should explain why it would not be more appropriate to present this proposal after the conclusion of the Welfare Quality project that is designed to develop, inter alia, European standards for on-farm welfare assessment. The options presented should also take into account that important stakeholders (the major livestock farming organisations) do not subscribe to the idea of creating a network as proposed in the report.

(3) The report should be more explicit in the main text on the expected impact of the options for various types of stakeholders, and on the implications for third countries. The report should differentiate between survey-based information on consumer preferences and actually expected purchasing behaviour, to check the implicit assumptions regarding the possible development of market shares. It should strengthen the analysis of impacts, especially on administrative burdens, possible specific impacts on SMEs and the relationship of any new labelling initiative in this area with existing and

planned labelling scheme more generally, including the EU organic label. It should consider the possible environmental impacts of induced changes in farming methods. The report should explain in greater detail how trade relations with third countries could be affected by the introduction of various forms of animal welfare labelling and should assess the compatibility of each of these forms with WTO rules.

(D) Procedure and presentation

The report should include a specific section presenting a succinct overview of the different positions of the main stakeholder groups on the most relevant issues. It should indicate what additional consultations are planned to complement the information from the 2005 Eurobarometer surveys.

2) IAB scrutiny process

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