Evaluation of the EU Policy on Animal Welfare (EUPAW)

Stakeholders’ consultation on policy options

Baltic Petfood Industry Association, the member of FEDIAF (the European Pet Food Industry Federation), which represents Petfood manufacturers in the Baltic countries, supports Responsible Pet Ownership (RPO) and looks forward to contributing to the EUPAW and herewith comments the various policy options considered by the European Commission services, also with a view to the Council conclusions on the welfare of dogs and cats adopted on 29 November 2010.

Baltic Petfood Industry Association, as well as FEDIAF preferred options refer only to pet animals, i.e. other stakeholders involved in farm animals (or zoo or circus animals) might prefer other options.

Policy options considered by the European Commission

- No action
- Non-legislative option
  - Communication and education
  - Corporate Social Responsibility
  - Research
  - Improved coordination
  - International initiatives
- Legislative option
  - General principles: duty of care etc
  - Wider scope (but subsidiarity)
  - Competence of staff
  - Animal welfare indicators for monitoring procedures
  - Co-regulation mechanisms and incentives
  - A European Net work of reference Centers

Baltic Petfood Industry Association is fully supporting FEDIAF preferred option – non-legislative with Communication, Education, Corporate Social Responsibilities and Code of Conducts

1. For pet welfare, commercial and non-commercial aspects have to be considered:

- Commercial are breeding, trade, exhibitions.
- Non-Commercial is ownership

For both commercial and non-commercial, the non-legislative approach seems appropriate.

2. Commercial

Associations exist in Europe representing breeders, traders and organizers of cat/dog shows.

Such associations should be encouraged by the European Commission to develop (or supplement existing) Codes of Good Practice covering breeding, trade, non-curative surgical intervention, documented identification/traceability of origin and animal welfare in general.

Once developed/supplemented, references of these Codes of Good Practice could be published in the C series of the EU Official Journal as reference documents.
Baltic Petfood Industry Association

3. **Non-commercial - Pet ownership**
   - Pet ownership as such is not commercial, as pets are kept for pleasure and company.
   - For animal welfare and for the benefit of the owner, the concept of Responsible Pet Ownership should be promoted to achieve that people recognize the benefits of pet ownership and the need to recognise that owning pets is a responsibility.
   - Stakeholders and industry (in view of corporate social responsibility) have already developed educational material
   - The European Commission should encourage the development, improvement and dispatch of such educational material by lending their support, promoting their use and publishing the references of such non-commercial educational material in the C series of the EU Official Journal.

**Baltic Petfood Industry Association is fully supporting FEDIAF position about the reasons for the preferred option**

1. **Guides or Codes to Good Practice** have been applied successfully by the European Commission in recent years in framework legislation. Hereafter two examples from the animal feed sector:
   a. **Feed Hygiene Regulation 183/2005** (safety, traceability, HACCP etc) which led to a series of Guides to Good Practice in the animal feed sector (farm feed, pet food, suppliers) recognized as workable tools by the European Commission and Member States via the Standing Committee procedure
   b. **Marketing and Use of Feed Regulation 767/2009** (Labelling, claims, advertising) which will lead to EU approved Codes to Good Practice via the Standing Committee procedure. For pet welfare, commercial and non-commercial aspects have to be considered: Commercial are breeding, trade, exhibitions.

2. **Awareness building in a sensitive issue as pet ownership** should be considered a more appropriate tool than legislation: Legislation on animal welfare, including pet animals, exists in all countries with different degrees of application and enforcement.
   It is considered that communication and education on emotional subjects will lead to more appreciation and understanding and thereby deliver the intended results on animal welfare.

3. **Baltic Petfood Industry Association is supporting translations into 3 Baltic languages of FEDIAF Educational Programme, and actively promotes this program adoption into local schools, as methodical material.**

*For further questions contact Virginija Vilčinskienė, Secretary-General, Baltic Petfood Industry Association (BIPA)*

P.D. 386, 08002 Vilnius-4

M: +37067450481

E: bipa@balticpetfood.org