



EUROPEAN COMMISSION
IMPACT ASSESSMENT BOARD

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16 JUN 2009

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 19 May 2009; resubmission)

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. The IA is split into two parts, one on animal welfare labelling and one on 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.

(B) Positive aspects

The revised version of the IA report has been improved in line with a number of recommendations in the Board's first opinion. The report now makes clear that the main aim of this initiative is to open an inter-institutional debate on the issues raised in the Animal Welfare action plan, and that it does not aim to improve animal welfare standards or the compliance with current standards.

(C) Main recommendations for improvements

General recommendation: The Board takes note that a full impact assessment will be provided before any future policy decisions on animal welfare

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labelling/establishment of ENRC. It also notes that DG SANCO agrees that a future impact assessment would address the recommendations in the Board's first opinion on the introduction of animal welfare criteria in existing or future product quality labelling schemes (such as on organic farming), use of the results of the Welfare Quality project, strengthened analysis of impacts on administrative burden, impacts on SME and environmental impacts. Nevertheless, to serve as a useful basis for opening an inter-institutional debate, further improvements are necessary to this report. It should be more explicit on how the expected impacts on stakeholders would be assessed for future measures, and explain what concrete evidence will be brought forward and which criteria will be decisive in the selection of a preferred option. The IA report also still needs to demonstrate that a Communication is the most appropriate form of consultation at this stage of development of the initiative.

The recommendations below are listed in order of descending importance.

(1) Explain why a Communication is the most appropriate instrument for this initiative. While the report confirms that the aim of this initiative is to launch an inter-institutional debate without defining a more definite policy line, it fails to demonstrate the need for a Communication. Alternative options, including the use of a Green paper to stimulate a wider debate, should be analysed.

(2) The report should explain what concrete evidence will be brought forward and which criteria will ultimately be used to select a preferred option. The report should clarify how and on the basis of which evidence the choice between Animal Welfare labelling in combination with a European Network of Reference Centres and alternative ways to communicate information on animal welfare to consumers and to promote the exchange of information and greater coordination will be made. As the current consultation is based on options which are not sufficiently developed in terms of impacts, the report should make clear that a future proposal will still assess all the relevant options.

(3) The report should be more explicit in the main text how the expected impacts on various types of stakeholders will be assessed for future concrete measures concerning Animal Welfare labelling, and which impacts are expected to be most significant. The report acknowledges that in the absence of concrete proposals the estimation of impacts is difficult if not impossible. It would therefore be better to avoid presenting what appears to be a comparison of options (cf. table at the end of part I, no page number).

(D) Procedure and presentation

The executive summary should be presented as a separate staff working document. The 'combined' option for ENRC should be mentioned in the executive summary as a separate option. Numerous editing changes should be done to ensure overall coherence of the revised version of the report. These will be communicated separately to DG SANCO. The length of the report should moreover be brought closer to the recommended maximum of 30 pages.

2) IAB scrutiny process

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External expertise used	No
Date of Board Meeting	Written procedure
Date of adoption of Opinion	16 JUIN 2009 The present opinion concerns a resubmitted draft IA report. The first opinion was issued on 27 April 2009.

