

August 2003

**REFORM OF THE COMMON AGRICULTURAL POLICY**  
**AGREED IN JUNE 2003**

**COMMENTS BY COMPASSION IN WORLD FARMING**

1. Compassion in World Farming (CIWF) welcomes the fact that the reforms have made farm animal welfare an important component of the CAP for the first time.

**Financial support for farmers who adopt good animal welfare standards**

Support to help farmers meet standards

2. We welcome the new “meeting standards” provision which allows financial support to be given to farmers to help them adapt to the introduction of demanding standards based on EU legislation in the fields of environment, public health and animal health and welfare.
3. The importance of the above provision arises in the context of the World Trade Organisation (WTO) rules. It is generally assumed that when the EU bans a cruel farming system, it cannot ban the *import* of meat or eggs coming from animals reared in that system. This leaves EU farmers vulnerable to cheap, low welfare imports; one way in which EU farmers can be helped to reach higher welfare standards while not being undermined by such imports, is to receive financial support with the costs involved in introducing higher standards.
4. CIWF urges the Department for Environment, Food & Rural Affairs (DEFRA) to use its option under the new “meeting standards” provision, i.e. to make money available to farmers to help them meet higher, legally binding, welfare

standards. CIWF urges DEFRA to make money available under this provision as it is essential that we as a society take all possible steps to move away from industrial livestock production to more humane and sustainable animal farming methods.

#### Support for farmers who go beyond legally required standards

5. Particularly welcome is the fact that, under the CAP reforms, payments can be made to farmers who enter into commitments for at least 5 years to introduce improved welfare standards which go beyond usual good animal husbandry practice. This is extremely important as it will encourage farmers to go further than required by the law (which often still permits very intensive, low-welfare farming) and to introduce really good welfare practices.
6. To CIWF's dismay, DEFRA has already made it clear in its consultation letter that it is unlikely to provide CAP money to help farmers who want to introduce the best of animal welfare standards. CIWF urges DEFRA to reconsider its position as the above provision is one of the most welcome reforms introduced to the CAP and it is a matter of great regret that Britain, which claims to lead the way on animal welfare in Europe, seems unlikely to use its new powers to help farmers who want to move to the best of animal husbandry systems.
7. Clearly, if payments are to be made, thought will have to be given as to which practices/systems qualify for the new welfare payments. CIWF would welcome the opportunity of contributing to the debate as to what standards should qualify for the new payments.

#### Cross-compliance with animal welfare standards

8. We welcome the fact that payment of the new single farm payment and other direct payments will be conditional on the respect of certain statutory animal health and welfare standards. This will support the enforcement of animal welfare legislation.

#### Farm advisory system

9. CIWF welcomes the new Farm Advisory System and urges that animal welfare be given a high priority in this system.

### **Decoupling of subsidies from production**

10. CIWF welcomes the fact that many subsidies which are currently linked to the volume of production will be replaced by a decoupled single farm payment. The decoupling of subsidies from production will remove the incentive to produce too many animals in order to attract high subsidies.
11. We are, however, extremely disappointed that Member States have the option of keeping some of the beef and sheep subsidies as coupled payments, i.e. coupled to the number of animals held as this will give a continuing incentive to the production of too many animals and to the use of stocking densities which are too high for good welfare. We urge Member States not to take up the option of keeping some of the payments as coupled payments. We are pleased that DEFRA has said that the options for reducing the extent of decoupling in England in the livestock sector will not be taken up.

### **Dairy regime**

12. CIWF is disappointed that the CAP dairy regime has not been thoroughly reformed. It is widely acknowledged that the quota system has promoted the use of high-yielding cows which suffer a range of serious health and welfare problems including metabolic hunger, digestive disorders, high levels of painful lameness and mastitis, sometimes fatal production diseases and premature culling due to severe loss of body condition and chronic exhaustion.
13. CIWF believes that the CAP dairy regime must promote a move away from the use of high-yielding cows. In particular, subsidies should be decoupled from production as soon as possible, with subsidy payments being made to farmers, not processors. These payments should be conditional on meeting welfare conditions such as having in place a herd health scheme which includes regular veterinary visits and a lameness and mastitis prevention service provided by a veterinary surgeon.
14. In particular, subsidy payments should be conditional on the adoption of a low-yield strategy or the ability to demonstrate that the herd has good health and welfare standards even with high yields. Higher direct payments should be available for farmers whose milk yield per cow is below a specified level.

### **Possible impact of CAP reforms on animal transport**

15. CIWF is concerned that the fact that some Member States may choose to continue to pay subsidies for cattle and sheep which are coupled (i.e. linked to production) could lead to live animals being transported from one Member State to another simply to attract a subsidy which is available in the country of import, but not in the country of export.
16. The situation we have in mind is the export of cattle or sheep from a Member State where all subsidies are uncoupled to one where subsidies are in part still linked to the number of animals held or slaughtered.
17. A similar situation arose a few years ago when some Member States paid subsidies under the Calf Processing Aid Scheme and others did not. This led to very young calves being transported from one Member State to another just to gain the subsidy which was available in the Member State of import.
18. It would be most undesirable if the new CAP arrangements led to live animals being transported from one Member State to another for no reason other than to attract a subsidy which is available in the Member State of import, but not in the Member State of export. Such transport was not the intention of the recent reforms, but it could be the unintended effect.
19. We urge the EU Member States and the European Commission to consider how to prevent the transport of live cattle and sheep from one Member State to another for the sole purpose of gaining subsidies.

### **Export refunds on export of live EU cattle to third countries**

20. CIWF is extremely disappointed that the CAP reform package has not abolished the payment of export refunds on the export of live cattle from the EU to the Middle East and North Africa. There is a huge body of evidence showing that the cattle suffer terribly during the long journeys, and then from cruel practices during unloading, onward transportation and slaughter in the Middle East.
21. Commission Regulation 118/2003 appears to end export refunds for the export of live cattle for slaughter, but in fact contains an exception which is so wide that it in fact permits the continued granting of export refunds for nearly all slaughter cattle. The exception is that refunds will still be granted for the export of cattle sent for slaughter to Egypt and the Lebanon. As nearly all EU

cattle being exported for slaughter in fact go to the Lebanon, the exception means that in practice there has been very little change and export refunds continue to be available for nearly all cattle being exported from the EU.

22. CIWF believes that all export refunds for live cattle exports should be ended as it is ethically unacceptable for taxpayers' money to be used to promote a trade which routinely inflicts great suffering on animals.

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