



31 March 2015

Karmenu Vella, Commissioner for Environment
Vytenis Andriukaitis, Commissioner for Health
Phil Hogan, Commissioner for Agriculture
European Commission
1049 Brussels
BELGIUM

Please reply to:
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Dear Commissioners Vella, Andriukaitis and Hogan

RE: Current revision of the BREF on the intensive rearing of poultry and pigs

The organisations signing this letter are concerned that the draft revision of the Best Available Technique Reference Document (BREF) for intensive rearing of pigs and poultry (IRPP BREF) recognises fully slatted floors for pigs as Best Available Technique (BAT).

We are aware that the IRPP BREF is not directly concerned with the welfare of farm animals but regret that it is not sufficiently consistent with EU legislation concerning the welfare of animals. We strongly believe that a system – fully slatted floors – that is inimical to good animal welfare and that makes compliance with EU animal welfare legislation impossible or very difficult should not be recognised as BAT. We are particularly concerned that fully slatted floors substantially impede compliance with the following requirements of Council Directive 2008/120/EC setting out minimum standards for the protection of pigs.

Requirement to provide effective enrichment materials

Annex I, Chapter I, point 4 of the Directive provides that pigs “must have permanent access to a sufficient quantity of material to enable proper investigation and manipulation activities, such as straw, hay, wood, sawdust, mushroom compost, peat or a mixture of such”.

It is extremely difficult, perhaps impossible, to provide a sufficient quantity of such materials on fully slatted floors. Indeed, this point is regularly made by farmers who say that material such as straw falls down in the gaps between the slats and risks blocking the drainage system. Accordingly, we urge that fully slatted floors should not be recognised as BAT.

Ban on routine tail docking

Annex I, Chapter I, point 8 prohibits the routine tail docking of pigs and provides that farmers must, before carrying out tail docking, first try to prevent tail biting by changing “inadequate” environmental conditions or management systems. Scientific research shows that the condition most likely to lead to tail biting is a barren environment without straw. Fully slatted floors almost always result in the provision of a barren environment without straw.

Indeed, the European Food Safety Authority (EFSA) has said that the causal factors of tail biting include: “the absence of straw, the presence of slatted floors and a barren environment”.ⁱ Risk factor analysis by EFSA reports that fully slatted floors are the third greatest risk factor for tail biting ranking only below a barren environment and a lack of long straw.ⁱⁱ This analysis showing that fully slatted floors are the third greatest risk factor for tail biting appears in the recent training tool produced at the Commission’s request by the *EUWeNet*.

Provision of nesting material for farrowing sows

The Directive recognizes that sows that are about to farrow have a strong need for nest building activity with appropriate substrate. Annex I, Chapter II, point B2 of the Directive provides that “in the week before the expected farrowing time sows and gilts must be given suitable nesting material in sufficient quantity unless it is not technically feasible for the slurry system used in the establishment”. This recognises that fully slatted floors make it difficult or impossible to provide suitable nesting material. It is evident from this that fully slatted floors are not “Best” technique as they cannot respond to a strong need of farrowing sows.

Physical and thermal comfort

Annex I, Chapter I, point 3 of the Directive provides that pigs must have access to a physically and thermally comfortable lying area. Physical and thermal comfort can only be achieved with a deformable and insulated surface (litter or mattress). It cannot be achieved with fully slatted floors.

Conclusion

It would be unhelpful, inconsistent and confusing for fully slatted floors to be recognised as a Best Available Technique from an environmental point of view when they make it extremely difficult, almost impossible, for farmers to comply with EU animal welfare legislation. Indeed, from an animal welfare viewpoint fully slatted floors are a Worst Available Technique. Moreover, recognition of fully slatted floors as BAT is inconsistent with the EU’s animal protection and welfare programme with its emphasis on training.

Alternative techniques with partly slatted floors are often considered to present better environmental performance e.g. in Denmark and the Netherlands. Techniques to mitigate emissions are perfectly efficient with partly slatted floors.

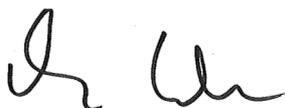
We urge the Commission not to accord the status of Best Available Technique to fully slatted floors for pigs of all categories in the revised IRPP BREF.

Yours sincerely



Peter Stevenson

Chief Policy Advisor
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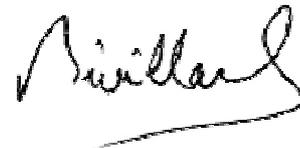
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Vice-president
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Reinhold Benning

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BUND - Freunde der Erde
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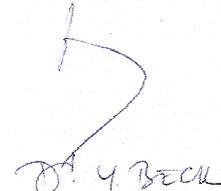
Anne Vonesch

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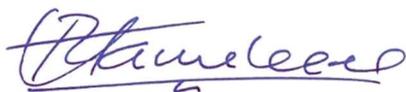


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ⁱ Scientific Opinion and Report of the Panel on Animal Health and Welfare on a request from Commission on the risks associated with tail biting in pigs and possible means to reduce the need for tail docking considering the different housing and husbandry systems. *The EFSA Journal* (2007) 611, 1-98.

ⁱⁱ *Ibid*