#### For the attention of the Refit Platform

# Agriculture - Three new proposals for improvements of EU-legislation

# **Equal baseline of animal welfare payments**

"cover only those commitments going beyond the relevant EU standards"

#### Area

Agriculture

### Legislation

REGULATION (EU) No 1305/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL Article 33

(Measure fiche Animal welfare Measure 14 Article 33 of Regulation (EU) No 1305/2013)

### **Burden on business**

The regulation of article 33 has a negative impact on the competitiveness between businesses in different countries. Normally it is not possible for businesses to charge for additional values when there is a legal framework behind, even though these measures have a positive influence on animal welfare. First and foremost the costs of production increase for the individual farmers.

At present an animal welfare payment can only be based on measures going beyond national legislation. In order to stimulate Member States to take steps beyond EU-regulation and develop animal welfare we suggest this should be changed.

A change in direction of the article 33 towards equal conditions, in this case of commitments that goes beyond EU mandatory standards and requirements of animal regulation and cross compliance, would have a positive impact on the competitiveness between businesses, strengthen the common market and also support development on a regional basis without lowering animal welfare.

### **Simplification proposal**

Introduce a common baseline according to EU regulation.

#### Effects of the simplification proposal

Increased investments
Improved animal welfare

### **Contact information**

The Federation of Swedish Farmers, LRF Dairy Sweden Suzanne Céwe T: +46 8 787 53 99 suzanne.cewe@Irf.se

### **Equal Agri-environment-climate payments**

# "cover only those commitments going beyond the relevant EU standards"

### Area

Agriculture

## Legislation

Article 28 REGULATION (EU) No 1305/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

#### **Burden on business**

National mandatory standards are often set in order to reduce a negative environmental impact. These national standards affects businesses by increasing costs of production and hence the competitiveness on the common market.

The global challenge of increased food consumption and climate effects is important to meet. Food production has to grow and become more effective environmentally.

In order to increase for example pasture lands and stimulate biodiversity it would be desirable to combine agri-environmental-climate payments with animal welfare payments.

### Simplification proposal

Introduce an equal baseline for environmental payments and open up for a combination of animal welfare payments and agri-environment-climate payments.

# Effects of the simplification proposal

**Increased investments** 

Improved environment/climate

#### **Contact information**

The Federation of Swedish Farmers, LRF Dairy Sweden Suzanne Céwe T: +46 8 787 53 99

suzanne.cewe@Irf.se

### Report of cattle (bovine animals) movements and definition of holding

#### Area

Agriculture

# Legislation

REGULATION (EU) No 653/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

### **Burden on business**

Grazing and cattle movements in Sweden

The legislation of registration of movements of bovine animals when put out to seasonal grazing is a huge administrative burden.

Farms in Sweden often have farming lands and pastures in several different places on a distance from the main holding. These pastures are therefore regarded as separate holdings. To maintain good animal welfare and management of pasture lands, animals are frequently moved, which results in several updates each season. Each movement outside the main holding, needs to be reported.

#### When there is an epidemic outbreak

In case of an outbreak of an epidemic disease, even with the existing regulation, there is a need of a fresh up date of all cattle's locations before any action can take place. To reduce ongoing infectivity, all cattle owned by the same person or business, should still need to be regarded as one epidemiological unit. Furthermore in case of an outbreak, neighboring animal holders will still need to be contacted. Existing regulations are therefore creating a false security.

#### Negative influence of the legislation

Cattle holders with many different pastures have an increased risk of sanctions compared to cattle holders with only one holding. The negative impact i.e. the administrative burdens and higher risk of sanctions results in less grazed areas. There is a demand of grazing animals but due to complex administration many landowners and cattle holders hesitates to increase the grazing areas.

An increased area of grazing and also the possibility to on an annual basis swap grazing areas with farmers with e.g. sheep is good for biodiversity due to the fact that different animals has different grazing strategies. But also to reduce parasite infection, since those seldom infests different kind of animals.

#### Aim of the legislation

The legislation must of course secure traceability and control of epidemic diseases. That is in everybody's interest. But it is also important that the legislation is relevant, without giving a false security as it does today. Risk classification in relationship to administrative burden is needed.

It is important that legislation supports active farming and extra work to further improve a high animal welfare, instead of increasing the administrative burdens on farming businesses with a complex production.

There will be no reduced traceability if the farmers only report annually in advance which grazing areas that will be in use during the forthcoming grazing season as long as there is one main holding and no change in ownership. The system will still contain up to date information on all animal holders with contact information and holdings in use. And in case of an outbreak of an epidemic disease, there will be no extra administration for authorities, since every outbreak demands a fresh up date of each cattle.

The Commission should leave an explanation to why and when, not all cattle with the same cattle holder, could be treated as one epidemic unit. The existing regulation indicates that

location of each holding is more important than ownership. If animal holders' all cattle is regarded as one unit, there is no need to demand reports of each movement between pastures.

The work with the delegated act according to article 22b concerning the member states which has special rules regarding grazing is extremely important. The administrative burdens on dairy farms are enormous and it is important to decrease the burden. With complex farming in combination with hard work and unstable finances the amount of farms with animals are decreasing fast. On a long term scale this will have a negative effect both on the world production of food but also on the development of rural areas.

### Simplification proposal

A new definition of holdings connected to stable areas.

A sub definition of holdings for pastures which are connected to holdings at the stable areas. A less complex regulation for animals which are moved to pastures without change of ownership. A reasonable level of administration would be that the cattle holder each year report which grazing areas that will be used during the forthcoming season. There should also be a possibility to add areas during grazing season.

# Effects of the simplification proposal

Time-saving Reduced costs Increased investments Reduced uncertainty

#### **Contact information**

The Federation of Swedish Farmers, LRF Dairy Sweden Suzanne Céwe T: +46 8 787 53 99 suzanne.cewe@Irf.se