

July 16, 2025

Submission by the European Landowners' Organization (ELO)

Call for Evidence: On-farm Animal Welfare for Certain Animals – Modernisation of EU Legislation

The European Landowners' Organization (ELO) welcomes the opportunity to contribute to the review of EU animal welfare legislation. We share the goal of ensuring high standards of animal welfare across the Union while safeguarding the economic and social viability of Europe's farming sector.

Sustainability requires its economic pillar

ELO underlines that sustainability must encompass its three dimensions: environmental, social, and economic. There is no sustainability without the economic pillar. Any legislative change that disregards the economic viability of farms risks undermining rural resilience, biodiversity management, and food security. Economic viability is not opposed to animal welfare; it is a prerequisite for its successful implementation.

Evidence-based and proportionate legislation

Future EU rules must be based on science, proven experience, and robust impact assessments. This ensures that regulations are feasible in practice, financially sustainable, and adaptable to technological innovation in animal husbandry and digital monitoring. ELO strongly supports the Commission's intention to carry out comprehensive socio-economic and environmental assessments before proposing new measures, including species-specific requirements.

One size does not fit all

The diversity of European farming systems means that uniform housing prescriptions or general bans on cages may not always deliver better welfare outcomes. For some species, specific practices such as temporary protective structures for sows to prevent piglet crushing or individual housing for calves during the colostrum period are essential for animal welfare and biosecurity. Similarly, abrupt removal of certain systems without suitable alternatives can lead to increased mortality and health issues. Legislation must therefore be species-specific and grounded in scientific evidence, avoiding a one-size-fits-all approach that ignores practical realities on farms across different regions and climates.

Digitalisation and welfare indicators

ELO supports the development of animal-based indicators and the integration of digital tools. Properly implemented, these tools can allow real-time monitoring, early detection of welfare issues, and promote outcome-based regulation rather than rigid prescriptive rules. However, it is essential that digitalisation reduces rather than increases administrative burdens. Interoperable systems and efficient data-sharing platforms will be key to making this approach practical and cost-effective.

Transition periods and financial support

Ambitious welfare objectives require realistic timelines and adequate financial support. Many farmers have invested significantly in facilities designed to comply with current EU legislation. New obligations that render these investments obsolete before their depreciation would impose severe financial strain. Extended transition periods and strong support mechanisms will be essential. Farmers who have already transitioned at their own expense should also be treated fairly to avoid competitive disadvantages.

Level playing field and import standards

The EU must ensure that high welfare standards do not result in the relocation of production to countries with lower standards. Equivalent requirements for imports of animals and animal products are essential to prevent unfair competition and maintain consumer trust, while respecting WTO obligations.

Consumer behavior and market realities

While consumers increasingly expect higher animal welfare, their willingness to pay a premium remains limited. Legislative proposals must consider this reality. Imposing substantial additional costs without a corresponding market return risks farm closures, reduced EU production capacity, and unintended consequences for both food security and rural economies.

ELO calls for an impact-driven, flexible, and economically viable approach to modernizing EU animal welfare legislation. A balanced policy that combines high welfare standards with species-specific solutions, realistic timelines, digital innovation, and fair trade conditions will ensure that Europe maintains a sustainable agricultural model capable of meeting ethical expectations while supporting rural livelihoods.