



19 November 2013

Tonio Borg  
Commissioner for Health  
European Commission  
B-1049 Brussels  
BELGIUM

Dear Commissioner

River Court, Mill Lane, Oxted, Surrey, GU7 1EZ, UK  
CABINET SECRETARY  
Email: [REDACTED]@ciwf.org

21. 11. 2013

COM	H80	NB	RD	K9	98K
HV	PDG	HK	JS	PM	ALL

### Commissioners' debate on cloning proposal at end of November

I gather that the College of Commissioners is to debate animal cloning at the end of November to decide its stance on the forthcoming Commission proposal.

Compassion in World Farming has played a leading role in the debate on the cloning of animals for food production and would welcome a meeting with you or your Cabinet.

### Our view as to the way forward

We believe, in light of the adverse impact of cloning on the welfare of both the clones and their surrogate dams, that cloning should not play any part in European farming.

Accordingly, in our view the EU should:

- Prohibit the carrying out of cloning for food production
- Prohibit the use of clones and their offspring in the EU; this will in effect make it pointless to import clones, their offspring and – crucially – the semen and embryos of clones from third countries.

It is important to discourage the import of the semen and embryos of clones as if this reproductive material is imported, the use of the offspring of clones could rapidly become widespread in EU farms.

Turning to the question of the food from clones and their offspring, we believe that:

- the sale of food from clones should be prohibited
- the sale of food from the offspring of clones should be prohibited or that, at the very least, such food should be labelled "food derived from offspring of cloned animals".

The reasons for our thinking are set out below.

### Cloning involves severe animal suffering

Scientific Opinions by the European Food Safety Authority (EFSA) show that cloning entails serious health and welfare problems for both cloned animals and the surrogate mothers who carry them to birth.

### Impact on health and welfare of surrogate dams

EFSA states that there is an increase in pregnancy failure in cattle and pigs that are carrying a clone and increased frequencies of abnormal or difficult birth especially in cattle. This, together with the increased size of cloned offspring, makes Caesarean sections more frequent in cattle carrying a clone than with conventional pregnancies.

### **Impact on health and welfare of clones**

In its 2008 Opinion on cloning, EFSA concludes: "The health and welfare of a significant proportion of clones ... have been found to be adversely affected, often severely and with a fatal outcome."

Most cloned fetuses die during pregnancy or birth. Only 6-15% of cloned cattle embryos and about 6% of pig embryos are born alive.<sup>1</sup> Many of these die early in life from problems such as cardiovascular failure, respiratory difficulties and defective immune systems. Of those born alive, up to 22% of cloned calves, 25% of cloned piglets and 50% of cloned lambs die before weaning.<sup>2</sup> Significantly, EFSA stresses that "the mortality rate of clones is considerably higher than in sexually produced animals".

### **European Group on Ethics**

The Opinion of the European Group on Ethics (EGE) in Science and New Technologies concluded that "considering the current level of suffering and health problems of surrogate dams and animal clones, the EGE has doubts as to whether cloning animals for food supply is ethically justified".

### **Use of offspring of clones on-farm**

Clones will primarily be used as elite breeding animals. It is their offspring that will be farmed for meat or milk.

The likelihood is that cloning will primarily be used to produce copies of the highest yielding dairy cows and fastest growing pigs. Scientific research shows that traditional genetic selection has already led to major health problems for such animals. EFSA has concluded that "genetic selection for high milk yield is the major factor causing poor welfare, in particular health problems, in dairy cows" and that genetic selection of pigs for rapid growth has led to leg disorders and cardiovascular malfunction. In the interests of animal welfare we should move away from selection for excessive production levels. However, the use of the offspring of clones on EU farms is likely to entrench the use of animals chosen for extreme production traits and risks perpetuating the health problems associated with such traits.

### **Is the incidence of pathologies and mortality declining?**

Some researchers claim that they are managing to reduce the incidence of pathologies and mortalities involved in cloning. Some evidence, however suggests that this is not the case. In 2012 EFSA updated its Scientific Opinion on cloning and stated that no new information has become available that would lead it to reconsider the conclusions in its 2008 Opinion on the animal health and welfare aspects of cloning.<sup>3</sup>

Unacceptable death rates of the animals involved have forced AgResearch, one of New Zealand's leading research organisations, to end its cloning trials. A Japanese survey has revealed that survival rates of transferred cloned bovine embryos and cloned calves had not improved – indeed had deteriorated – over a decade (1998–2007).<sup>4</sup>

Yours sincerely



  
Chief Policy Advisor

<sup>1</sup> EFSA, 2012. <http://www.efsa.europa.eu/en/efsajournal/pub/2794.htm>.

<sup>2</sup> Broom, D. and Kirkden, R., 2012. Welfare of Genetically Modified and Cloned Animals Used for Food.

<sup>3</sup> As 1

<sup>4</sup> Watanabe S and Nagai T, 2011. Survival of embryos and calves derived from somatic cell nuclear transfer in cattle: a nationwide survey in Japan. *Animal Science Journal* 82, 360-365