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Dear Mr Haniotis

Compassion in World Farming has responded to DG Agri's on-line consultation on the CAP post 2013

We believe that the core principle that should determine strategic thinking about the CAP after 2013 is that farmers should be rewarded by the market for outputs, with the taxpayers' role being to provide funding for public goods that the market cannot deliver.

Our vision is a European agriculture that has replaced industrial livestock production with humane, sustainable forms of animal husbandry. This would not only improve animal welfare but would produce healthier animals, a more resource efficient livestock sector and a reduced impact on the environment

We recognise that the CAP provides a degree of support to animal welfare through the cross-compliance provisions, certain of the measures in the Rural Development Regulation and Article 68 of Regulation 73/2009. However, the Member States make only limited use of these provisions. Most EU pigs and poultry and many cattle continue to be farmed industrially in systems that fail to respond to animals' welfare needs as identified by the Scientific Opinions of the European Food Safety Authority. Post 2013 the CAP should develop more ambitious objectives as regards animal welfare.

A core objective for the CAP post 2013 should be the development of a sustainable, resource efficient livestock sector. Industrial livestock production is not a sustainable way of feeding a growing world population and is an inefficient use of scarce resources.

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Industrial production is dependent on feeding substantial quantities of cereals and soy to animals. Commission data show that 58% of EU cereal production is used as animal feed. Feeding cereals and soy to animals is inefficient as much of their energy value is lost during conversion from plant to animal matter. Research shows that several kilos of cereals are needed to produce 1 kg of edible meat. Using cereals and soy as animal feed is a wasteful use not just of these crops but of the land, water and fossil fuel energy used to grow them.

A sustainable approach should avoid the excessive use of feed crops and instead put more emphasis on raising animals on pastures and mixed farming where crop residues can be used to feed animals and their manure fertilizes the land and improves soil quality.

Impact on environment and climate change

The adverse impact of industrial livestock production on the environment is widely recognised. The excess nitrogen emanating from liquid manure and mineral fertilisers leads to water pollution, eutrophication, soil degradation and poor air quality.

Industrial animal production also has a detrimental impact on climate change. Some argue that industrial pig and poultry production has a lower carbon footprint than extensive cattle rearing. However, calculations of the contribution of intensive pig and poultry production to greenhouse gas (GHG) emissions tend not to take account of this sector's responsibility for land-use change. The growing of soy as animal feed is one of the main drivers behind the destruction of the Amazon rainforest and the savannah lands of South America. Such land-use change releases considerable amounts of stored carbon into the atmosphere. EU industrial animal production is a major contributor to these GHG emissions as the EU imports substantial quantities of soy for animal feed.

Moreover, recent research shows that the carbon sequestering benefits of cattle kept on temperate unfertilised grassland without being given additional feed inputs balance or even outweigh their methane emissions.

To sum up, the notion that extensive cattle have higher GHG emissions than industrially reared pigs and poultry is questionable if proper account is taken of the land-use change entailed in industrial pig and poultry production and the carbon sequestering benefits of extensive cattle production. In addition, ruminants have the great advantage of being able to make use of marginal land that is unsuited to other forms of food production.

Conclusion

The majority of CAP funds post 2013 should be devoted to public goods that the market cannot deliver. The CAP should promote a move from industrial livestock production to humane, sustainable animal husbandry. This would benefit not just animal welfare and health but also produce a more resource-efficient agriculture with a reduced impact on the environment and climate change.

Yours sincerely



Chief Policy Advisor