Opinion paper: implementing pig welfare legislation: difficulties and knowledge-exchange strategies

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Implementation difficulties: the extent of the problem

It has become increasingly clear that pig producers face difficulties to implement the EU legislation on animal welfare. The switch from individual sow stalls to group housing of gestating sows from January 2013 is one clear example of the difficulties found in several Member States (MS) to implement the current ‘Pig Directive’ (EU-Directive 2008/120/EC). Besides, clear cases of non-compliance, a significant number of pig producers left the industry and allowed their herds to run down because they felt unable to comply with the new legislation. This impact on the pig sector affected mostly small-scale producers. In 2013, the Commission, via a letter of formal notice, called several MS to take action to address deficiencies in the implementation of the EU legislation increasing pressure on MS to enforce group housing of sows. In the near future, producers will certainly be asked to increase compliance on issues such as the use of manipulable material. Increasing concerns on this item are illustrated by the EFSA reports on tail biting and tail docking (e.g. EFSA, 2007, 2011, 2014) and the meetings organized by the European Commission on the development of guidelines concerning the issue of enrichment material.

Implementation difficulties: reasons

Several difficulties and bottlenecks underlie the delayed transition and expected non-compliance with the Pig Directive. These include cost, apparent conflict with other regulations and knowledge gaps. In Belgium, Tuyttens et al. (2011) found that the main reasons for not planning to convert to group housing was that the mortgage of the current pig unit had not yet been paid off, in addition to the lack of finances. Although the Scientific Veterinarian Committee of the European Union issued a first report on the welfare problems of gestating sows kept in stalls in 1997, many producers definitively started the transition too late. The absence of early communication between European bodies and clear actors from the pig sector impaired anticipation to the future changes. A lack of knowledge appeared to be a major obstacle to implementation and self-confidence about the benefits of the change. This may relate to difficulties in the interpretation of the regulation especially in converted buildings. For example, the Pig Directive lays down requirements for space allowance and type of floor for the group housing of sows: ‘… at least 0.95 m² per gilt and 1.3 m² per sow, must be of continuous solid floor of which a maximum of 15% is reserved for drainage openings’. Some MS have specific interpretations regarding solid floors and depending on how this issue is resolved, space requirements per sow may vary dramatically across farms. Such difficulties in interpretation are currently applicable to the directive requirements on manipulable material: ‘… 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 …’. Second, producers and veterinarians may not be sufficiently familiar with the range of options available to comply with the legislation and economic viability. Producers of gestating sows, especially small-scale producers, claimed a lack of the expertise needed to manage such group systems effectively. Third, when the Pig Directive was approved, several farmers and veterinarians were sceptical that group-housed sows would be as productive as those in crates and in good welfare. A considerable proportion of pig producers were forced to convert without believing that the advantages of group housing outweigh the disadvantages.

Knowledge-exchange (KE) strategies

Knowledge production and exchange is generally considered as a particularly important instrument for supporting implementation. KE should include both the training of producers, competent authorities, official veterinarians and animal welfare officers, as well as the exchange of information and experiences between stakeholders in order to increase harmonization across MS. KE material should include not only information on how to implement EU legislation on...
animal welfare but also on the expected benefits (economic and others) of doing so. In many countries, existing infrastructure generally includes public and private bodies and offers training to regular students and professionals. Still, there is a real need for reaching a common understanding of animal welfare legislation. Dissemination is particularly difficult when the knowledge material is addressed to private veterinarians and producers, especially small-scale producers. One possibility that is currently being explored by one of the institutions (Universitat Autònoma de Barcelona) that participated in the European project EUWelNet is to involve private companies in the training sessions. The companies cover the cost of the training sessions and recruit potential participants so that the training has no cost for the veterinarians and producers participating in it. In exchange, the private companies are seen as providing an extra service to potential customers. Details on this initiative can be found at www.fawec.org. Several key points for implementation to be effective have been highlighted by the EUWelNet project (2013, www.euwelnet.eu) and include interaction between public and private actors and emphasis on the economic benefits of welfare and needs of small-scale producers. KE strategies should actively involve the participants (MacMillan and Benton, 2014).

It is our opinion that four main conditions should be fulfilled for KE to be effective (see also Figure 1):

1. **EFSA guidelines and recommendations, and EC decisions** should be transparent and clear enough to be transferred with anticipation. Transfer of information should be done not only at governmental level but also to key selected regional facilitators such as universities and research institutes from each European country. Independent European bodies such as the Federation of Veterinarians of Europe (FVE) can ensure the communication between political decision centres and the regional facilitators.

2. **Regional facilitators should directly transfer knowledge to field veterinarians and producers, including small-scale producers.** A selected networks of producers and veterinarians should get the information and be able to share it with other participants from the livestock industry. Selection of network participants will vary across European regions depending on the structure of the pig sector, among other things.

3. **Horizontal dialogue should be extensively promoted within and between networks.** The economic impact of each particular animal welfare concern should be addressed and further evaluated by all network participants. Economic viability of the changes should be well estimated, especially on small farms. Producers and veterinarians should be informed about the economic and welfare benefits of such changes. Veterinarians are key players to detect possible bottlenecks when applying such changes on commercial farms. Feedback from the networks' participants should in turn be transferred back to the European commission through the regional facilitators supported by the FVE.

4. **Economic input is definitively needed to set up networks and have an effective KE.** To be sustainable over time and truly effective, KE should be driven by key financial actors of the livestock industry and be preferably independent of any EU funding. Private companies are key promoters who can provide the financial support for running the KE pathway. Besides contributing to the sustainability of each livestock sector, investments from private companies in KE is definitively perceived as a market strategy.

**Conclusion**

The European Commission is actively working to raise awareness on animal welfare issues and to support the implementation of the existing legislation (European Commission, 2012). Still, implementation remains a great challenge across all MS, especially affecting small-scale producers. Pig producers clearly claim a lack of guidance and technical–scientific knowledge, especially on the economic benefits of such animal welfare changes. The effective exchange of knowledge is a major bottleneck that should be overcome to increase compliance. Public–private cooperation undoubtedly plays a crucial role in the early identification of knowledge gaps and exchange of knowledge. The engagement of producers, especially small-scale producers, should be promoted through horizontal dialogue and practical training.

**References**


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