



Mme Stella Kyriakides
Commissioner for Health and Food Safety

Brussels, 22 July 2022

Subject: Commission feedback on the draft decree for the establishment of the Italian government's system of animal welfare certification (SQNBA)

Dear Commissioner Kyriakides,

We hereby urgently wish to draw your attention to the serious concerns raised by the proposal, recently submitted to you, by the Italian Government - and, in particular, by the Ministry of Agriculture - to create a voluntary labelling system on animal welfare linked to public funds PAC and PNRR through the Eco-scheme 1 of the National Strategic Plan (PSN). This label, in fact, would be given to products obtained through procedures that have nothing to do with animal welfare and which currently present strong opacity compared to the conditions of animals reared in Italy.

The present letter also welcomes the requests of the main animal rights, environmental and consumer rights associations, also supported by the Union of Public Medicine Veterinarians, who have publicly criticized the draft decree. Criticisms that have so far remained totally unheard.

Today Europe is experiencing a dramatic moment, in which all the fragilities of the current economy are strongly emerging, further weakened by the war, and the devastating impact of the climate crisis on agriculture and our nature. Precisely for this reason we cannot afford to take steps backwards on phenomena, such as the impact of livestock farming on the climate and the direct relationship between animal welfare, climate crisis and food security - also highlighted by a recent [UN resolution](#) - which if not adequately addressed today, with the help of the resources that the European Union is making available to the Member States, will become catastrophic for our country and for future generations.

Therefore, we are here to ask you to intervene promptly with a critical and timely response to the decree sent by the offices of the Italian Ministry of Agriculture, to avoid the support of the European Commission for a waste of public resources that will not be able - currently - to improve conditions of animals reared in Italy. On the contrary, such a decree would end up conveying partial and non-transparent information, resulting in misleading consumers who, convinced that they are buying a product deriving from farming systems that respect animal welfare, could instead buy products obtained from animals that have always lived in cages or have suffered painful mutilations.

The results that emerged from the recent report prepared to complete the Study on animal welfare labelling, commissioned by the Directorate General for Health and Food Safety, are in

line with our requests, highlighting the need to simplify certification systems related to animal welfare in order to prevent European consumers from being unduly confused by the proliferation of multiple and different schemes. In this context, the provision of a further certification scheme is even more serious. Not only it would add to those already existing, thus causing possible market distortions and a growing trend towards the nationalization of agri-food production, but it would also result in a disinformation tool by imposing itself as the only model of certification lacking the due degree of transparency and accessibility, ultimately hindering any possible attempt for an effective transition to more sustainable production systems that respect animal welfare.

With the aim of ensuring that the voluntary labelling endorsed by the European Commission is truthful, correct and transparent, it is essential that the Ministries modify the decree in the following points and that the Commission asks to intervene:

- By inserting different levels of certification for each species, visible and comparable on the label, in order to provide the consumer with all the key information to be able to choose products in an informed manner and thus encourage the transition.
- By including the ethological needs of species, the density of animals and the conditions of transport among the criteria for defining animal welfare.
- Providing surprise on-site checks, both for primary production operators and for those in the food sector, at least once a year, and not every three years as required by the decree.
- Given the central role of the Technical Committee in guaranteeing animal welfare by dismissing the various breeding regulations, the Associations renew their request to be part of it with three expert representatives indicated by civil society.

We hope that the Commission will give a negative opinion to such an unfortunate and dangerous project, which in no way improves animal welfare and deceives consumers, and asks for all the changes, additions and clarifications necessary to help Italy take the necessary steps in the right direction, towards a truly sustainable future for all and for a prudent and correct management of public funds.

Yours sincerely,

MEP Eleonora Evi, Greens/EFA

MEP Francisco Guerreiro, Greens/EFA

MEP Anja Hazekamp, The Left

MEP Tilly Metz, Greens/EFA

MEP Manuela Ripa, Greens/EFA

MEP Caroline Roose, Greens/EFA

MEP Sylwia Spurek, Greens/EFA

MEP Thomas Waitz, Greens/EFA