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CORRESPONDING AUTHORS

Jean-François Hulot (jfhulot.ieepassociate@ieep.eu), Faustine Bas-Defossez (fbas-defossez@ieep.eu) and Juliette Pagnon (jpagnon@ieep.eu).

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IEEP main office

Rue Joseph II 36-38, 1000 Brussels, Belgium Tel: +32 (0) 2738 7482

Fax: +32 (0) 2732 4004

London office

Dlaco

25EP, 25 Eccleston Place Belgravia SW1W 9NF

Tel: + 44 (0)204 524 9900

CONTENTS

1.	Executive summary	1
2.	Introduction	3
3.	Key characteristics of the French market	4
3.1	Key characteristics of the animal sector in France	4
3.1.	1 Facts around production, environment and employment	4
3.1.2	2 Facts around consumption	5
3.1.3	3 Animal welfare aspects Error! Bookmark not de	fined.
3.2	Key characteristics of the French market per sector	8
4.	Opportunities and barriers analysis	14
4.1	Barriers to implementing a cage-free transition in France	14
4.2	Summary of key barriers to a cage-free transition in France	21
4.3	Opportunities and drivers for cage-free farmin transition in France	23
4.4	Summary of key opportunities to a cage-free transition in France	35

1. EXECUTIVE SUMMARY

The support for greater consideration of animal welfare is growing considerably and the COVID19 Pandemic—which we are just starting to recover from—was a reminder of how urgent and necessary it is to move away from intensive livestock farming to prevent future risks of pandemics triggered by zoonotic diseases¹.

In the summer of 2021, the European Commission announced an upcoming proposal on a ban on cages for farmed animals for 2023, to be implemented in 2027. This announcement triggered a certain level of questions and some concerns around the financing of the transition.

As a major meat and meat products producer in the EU, being the foremost producer in beef, second in milk, and third in pigs or poultry, France's transition towards cage-free farming is of relevance for other EU countries. This report, therefore, analyses the barriers and opportunities for the transition, following a short description of the key characteristics of the French market.

In France, 36% of laying hens and 97% of rabbits are raised in cages; 95% of pigs are raised on slatted floors in buildings; 64% of the French agricultural area is used for animal feed.

There are many barriers to the transition but also many opportunities linked to financing the transition to cage-free farming.

The most substantial barriers identified in this report are the following:

- The current use of the Common Agricultural Policy (CAP) subsidies and the implementation of the EU promotion of farm products programme by France. Indeed, the most intensive farming regions get more CAP support than the extensive farming regions, despite the effects of intensive farming on animal welfare. The EU promotion program for agri-food, from which France has received more than 67 million euros for meat products promotion between 2016 and 2019, says hardly any standards about animal welfare.
- A lack of a regulatory framework and transparency around the breeding conditions of animals which is particularly relevant for rabbits (there is no species-specific legislation protecting the welfare of farmed rabbits).
- High short-term investment costs. High investment costs to farmers, the lack of sound information on the return on investment, as well as the lack of

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¹ IPBES (2020) IPBES PandemicsReport: Escaping the 'Era of Pandemics. IPBES website: https://ipbes.net/pandemics

financial support provided, for example, by banks strongly impede the financing of alternative farming systems in France.

There are however several opportunities for the transition mostly linked with upcoming changes in EU law and different implementation choices at the national level.

- The future CAP and in particular the CAP strategic plans at the national level represent an opportunity to better use EU agricultural subsidies for the transition towards cage-free farming. If willing to do so, France has an opportunity to propose higher animal welfare standards on livestock farms and to use the new eco-scheme measure to activate the transition. The Commission will have a key role to play in this, as it will have to check whether the Member States' strategic plans are in line with the Green Deal and their relevance in view of the upcoming legislative proposal on cage-free farming (2023).
- **Existing environmental regulations** can also be a driver of a reduction in livestock density and therefore an opportunity for a cage-free transition. They are mostly set at the EU level, as they are for ammonia emissions.
- Financial instruments such as the French Recovery Package offer funding opportunities for the transition. 100 million euros has been aimed at animal welfare and biosecurity in farming in addition to 10 million euros aimed at the modernisation of slaughterhouses. This budget can support producers and other actors across the value chain for sectoral transformation, highlighting animal welfare as one of the funding criteria. However, this budget allowance is not bound by an obligation to deliver a specific result, clear priority or objectives in terms of animal welfare. In the public market only, the EU Green Public Procurement criteria for food and catering services contain animal welfare conditions which could then indirectly help the transition. The Egalim and Climate Laws also intend to stimulate sustainable products and meat in collective catering services, by allocating at least 50% of sustainable products, of which 60% of meat would be of "quality" in the sense of the Egalim law.
- **Labelling**: In the egg-laying sector, labelling instruments can help raise consumer awareness about the breeding conditions of hens, allowing them to make informed choices related to animal welfare.
- Research and Innovation projects in the frame of Horizon Europe (cluster
 6) can, depending on their use, offer good practice examples as well as practical tools and guidelines to farmers who would like to increase their onfarm animal welfare.

2. INTRODUCTION

Most European citizens consider the protection of farm animal welfare as important or very important and think that it needs to improve compared to the current situation (European Commission, 2016). Under the European Citizens' Initiative (ECI) 'End the Cage Age', well over one million Europeans have called for improved animal welfare standards in EU farming. Following this initiative, the European Commission committed to working towards a ban on cages for farmed animals.

The proposal for a ban on cages for farmed animals is scheduled for the end of 2023 and will be part of the ongoing revision of the animal welfare legislation under the EU's flagship food policy, the Farm to Fork Strategy (F2F).

Progress in terms of animal welfare and animal and human health has been welcomed but this announcement also raised some concerns and questions from the Member States around the economic and practical constraints of this transition.

This short analysis aims at assessing the feasibility of transitioning towards cagefree farming in France, considering the costs which are associated with the transition and the opportunity for the French market.

In particular, IEEP provides an overview of:

- First, the key characteristics of the French market;
- Second, the barriers to, and opportunities of, the transition.

3. KEY CHARACTERISTICS OF THE FRENCH MARKET

3.1 Key characteristics of the animal sector in France

3.1.1 Facts around production, environment and employment

France is a major meat and meat products producer in the EU, being the foremost producer in beef, second in milk and third in pig or poultry.

Table 1: Animal production by species in EU and French shares

2019 (EU27)	Beef	Veal	Pig	Sheep and goat	Poultry	Milk
EU production	5.9	1.0	22.8	0.5	12.8	143.1
French share	21%	19.8%	9.7%	17.9%	12.8%	17.2%
Rank	1	3	3	2	3	2

*in million tons of carcass weight (except milk: million tons)

Source: Eurostat

Livestock is mainly located in the east and west of France (where they are particularly intensive) and in the mountainous regions. For example, two-thirds of poultry production are located in two Western regions (Brittany and Pays-de-Loire). This makes the issue of reducing GHG emissions due to livestock, or change of rearing methods, very different in terms of impacts across the regions.

Pig and poultry farms are further specialising in Brittany. For example, the many traditional mixed-farm structures with an average surface of 10 ha have undergone a technical revolution, which has led them to specialize in intensive poultry and pig farming. Brittany is now the leading breeding region in France – hosting 42% of laying hens² and 58,6%³ of pigs. Since 2000, the number of

https://draaf.bretagne.agriculture.gouv.fr/IMG/pdf/07 Essentiel FFvolailles ponte 2020 cle03e4c2.pdf

https://draaf.bretagne.agriculture.gouv.fr/IMG/pdf/05 Essentiel Bgne porcs cle8922f1.pdf

² Draaf (2020), Filière volailles de ponte.

³ Draaf Bretagne (2020), Filière porcs.

specialized pig farms has decreased by 26% in Brittany³, whereas production levels have not significantly changed⁴.

Negative consequences of this higher degree of concentration are alarming, like the high nitrogen levels associated with the high animal stocking densities (Leip, et al., 2012). In 2019, 63%⁵ of the monitoring stations that measure and assess water quality showed a nitrate concentration higher than the maximum level fixed by the EU's Nitrate Directive (25mg/L).

At the national level, total livestock-related employment accounts for approximately 3.2% of national employment⁶.

3.1.2 Facts around consumption

Overall meat consumption in France has decreased since the early 1990s, following the general trend of the EU and developed countries in general, and stands at 89 kgec/person/year (2018) compared to 105 kgec/person/year on average (during the 1980'). It decreased by some 12 % over the last ten years⁷ and shifted to less beef and more poultry and charcuterie⁸. Although meat consumption appeared to have stabilised in France since 2014, in recent years it has further decreased: by 1.5% globally and by 1.7% per habitant since 2020⁹.

The trends however vary depending on the type of meat. The consumption of some meats¹⁰ has been declining for several years: it decreased by 0.4% on average per year between 2010 and 2019 and by 2,1% in 2020^{Error! Bookmark not defined}. Ovine (sheep) and equine (horse) meat show the most important decline whereas pork meat consumption remains stable Error! Bookmark not defined. However, overall, white meat consumption is growing, with pork being the main meat consumed in France today (see table 1 for details). Poultry meat consumption has also been increasing for 20 years with an average annual growth rate of 2,3% between 2010 and 2019 even though it decreased by 0,3% in 2020 due to the pandemic Error! Bookmark not defined.

France hosts the fastest-growing organic sector in the EU. Since 2010, the French organic sector overall has seen continuous growth, making France the

⁸ Agreste (2020), « En France, la consommation de viande se modifie fortement entre 1960 et 2018 » <u>link</u>

⁴ From 2000 to 2018: the total production (capita) = -4%; Average weight (kg net/head) = +7%; Weight produced (tonne carcass equivalent) = +2% (Draff Bretagne (2019) *La production de viande porcine.*https://draaf.bretagne.agriculture.gouv.fr/La-production-de-viande-porcine

⁵ SAGE (2020) <u>https://bretagne-environnement.fr/nitrates-cours-eau-bretons-datavisualisation</u>

⁶ INRAE (2016), Roles, impacts et services issus des élevages. https://www.inrae.fr/sites/default/files/pdf/esco-elevage-eu-resume-francais-maj-12janv.doc.pdf

⁷ Credoc (2018)

⁹ Agreste (2021), La consommation de viande en France en 2020, <u>link</u>

¹⁰ Bovine, porcine, equine, ovine, other

second biggest organic market in Europe after Germany¹¹. When considering home consumption of organic products, the French organic market is worth 12.67 billion euros, i.e. a 10.4% increase compared to 2019¹². Regarding livestock, the number of organic farmers has increased by 16.5%. French organic eggs have a market share value of 18%, while organic meat and meat products are only at 2.4% (FIBL, 2020). More specifically, the share of "organic livestock"¹³ in the production of the livestock sector is 6.43% for the beef sector, 8.73% for the sheep sector, 1.8% for the pig (sow) sector¹⁴ and 27.48% for the poultry sector (18.43% for laying hens only and 9.1% for meat chicken)¹⁵.

3.1.3 Animal welfare aspects

While free-range and organic egg production is above the EU average in terms of housing quality, it is still behind the cage system and in the rabbit breeding sector caged systems are largely dominant. Some research and commercial initiatives are underway to propose other solutions for the market. In response to consumer demands and NGO pressures for better animal welfare, the French government passed a law in 2018 ("Egalim"), which includes a chapter on animal welfare. Relating to the farming system, the only measure of that law is the ban of new or refurbishing cage systems for hens. A series of further announcements were made in 2020/2021 to improve animal welfare relating to some practices, such as the castration of piglets without anaesthesia and the elimination of male chicks. However, those announcements have not been implemented yet. Even though those new promises sound ambitious, they haven't been translated into regulation and focus only on farming practice changes rather than on a systemic transition.

This triggered however a societal debate on the extra costs and on who should bear them between the producers and the consumers.

Box 1: Farm animal welfare

- 3 out of 4 French citizens would like to see an improvement in the current farming methods and the living conditions of animals on French farms for environmental and/or animal welfare reasons ¹⁶.
- In France, **36** % of laying hens and **97**% of rabbits are raised in cages, **95**% of pigs are raised on slatted floors in buildings^{17,18}.

Box 2: Intensification of the livestock sector

- 64% of the French agricultural area is used for animal feed (12.7 million ha of grassland and rangeland, 1.7 million ha of fodder from annual plants and 4.2 million ha of cereals, oilseeds, and protein crops¹⁹).
- Laying hen farms are highly concentrated in France: **70% of the laying** hens are found on **12% of the farms**, with more than 50,000 animals per farm²⁰.
- The French region of **Brittany is highly concentrated and specialised** in its livestock production. For example, it hosts 55% of French pig farms²¹, and accounts for 81% of treated manure volumes²².
- As a country with a high number of intensive livestock farms, France is among the highest emitters of ammonia emissions: 94% of these emissions came from the agricultural sector in 2018.

 $\underline{https://www.ifip.asso.fr/fr/content/accept-acceptabilit\%C3\%A9-des-\%C3\%A9levages-par-la-soci\%C3\%A9t\%C3\%A9-enfrance-cartographie-des-controverses$

https://oeuf-info.fr/infos-filiere/les-chiffres-

 $\frac{\text{cles}/\#:\sim:\text{text}=64\%20\%25\%20\text{des}\%20\text{poules}\%20\text{en}\%20\%C3\%A9\text{levages}\%20\text{alternatifs}\&\text{text}=\text{Et}\%20\text{ils}\%20\text{continuent}\%20\text{leur}\\ \underline{\%20\text{travail},(47\%20\%25\%20\text{en}\%202019)}\;.$

 $\underline{https://agreste.agriculture.gouv.fr/agreste-web/download/publication/publie/GraFra2021Integral/GraFra2021 integral.pdf}$

 $\underline{https://www6.paris.inrae.fr/depe/content/download/3488/33832/version/1/file/Inra-Esco-azote-elevage-syn68p.pdf}$

¹¹ Agence Bio (2019), Organic farming and market in the European Union, <u>link</u>

¹² Agence Bio (2021), Le bio, acteur incontournable de la souveraineté alimentaire, <u>link</u>

¹³Organic and in-conversion certification.

¹⁴ Only figures for sows are reported

¹⁵ Agreste (2021) Agriculture Biologique. <u>Link</u>

¹⁶ Roguet et al. (2020), Acceptabilité des élevages par la société : cartographie des controverses, mobilisations collectives et prospective.

¹⁷ CNPO (2020), Les chiffres clés.

¹⁸ CIWF (n.d). Animaux d'élevage : cochons & truies. https://www.ciwf.fr/animaux-delevage/cochons/

¹⁹ Jouven et al. (2018), Quels équilibres végétal/animal en France métropolitaine, aux échelles nationales et " petite région agricole " ? https://productions-animales.org/article/view/2374

²⁰ Agreste (2021). *Graph'Agri 2021 : L'agriculture, la forêt, la pêche et les industries agroalimentaires. Produit agroalimentaire.* p.131.

²¹ Based on 2013 data (https://draaf.bretagne.agriculture.gouv.fr/IMG/pdf/TAB_COMPLET_cle416585.pdf)

²² INRAE (2012), Les flux d'azote liés aux élevages.

3.2 Key characteristics of the French market per sector

Table 2: Key characteristics of the French market per sector

	Pigs and sows	Laying hens and poultry	Rabbits
Demand drivers	Since 2009, pork consumption has remained relatively stable in France, while overall meat consumption has decreased ²³ . Even though it decreased in 2019 (-3.1%) and 2020 (-0.9%) compared to the previous year, the average annual growth rate between 2009 and 2020 is 0% ²⁴ . With 31.9 kgec ²⁵ per year per capita in 2019 and 33.4 kgec in 2020, pork is the most consumed meat in France ^{24, 26}	In France, egg consumption has been fairly stable since 2009 (-0.3% per year), reaching 229 eggs per capita in 2019 ²⁷ . Measured in kilograms, French citizens consume the equivalent of nearly 14.2kg of eggs per year per person, of which 34% are in the form of egg products ²⁷ . In 2020 the sale of organic eggs increased by 16.9%, free-range eggs by 15.6%, and eggs from hens kept on the floor (barn) by 152% compared to 2019 ¹⁷ . The French are also eating more poultry meat, as the average annual growth rate	Despite culture and tradition, consumption is declining every year. Reasons are the high price compared to other types of meat, difficult cooking techniques as well as a lack of interest by younger generations ²⁸ . In 2019 rabbit meat consumption decreased by 7% compared to 2018 ²⁹ . French citizens are consuming half as much rabbit meat as twenty years ago, i.e. less than 500g per person in 2019 ²⁹ .

²³ CESE (2019) Les enjeux relatifs aux conditions d'élevage, de transport et d'abattage en matière de bien-être animal (BEA). Conseil Economique Social Environnemental. https://www.lecese.fr/travaux-publies/les-enjeux-relatifs-aux-conditions-d-elevage-de-transport-et-d-abattage-en-matière-de-bien-etre-animal-bea

https://www.franceagrimer.fr/fam/content/download/64687/document/NCO-VIA-Consommation%20de%20viandes%20en%20France-2019.pdf?version=1

https://www.franceagrimer.fr/fam/content/download/66996/document/NCO-VIA-

Consommation viandes France 2020.pdf?version=2#:~:text=Ce%20repli%20global%20correspond%20%C3%A0,kg%20par%20habitant%20en%202020.

 $\underline{https://agreste.agriculture.gouv.fr/agreste-web/download/publication/publie/GraFra2020Chap12.10/Graf2050\%20-\%20Avi.,\%20oeufs,\%20foie\%20gras,\%20cuniculture.pdf}$

²⁴ FranceAgriMer (2020), La consommation de viande en France en 2019.

²⁵ Kilogram equivalent

 $^{^{\}rm 26}$ FranceAgriMer (2021), La consommation de viande en France en 2020.

 $^{^{27}\} France AgriMer\ (2020)\ \textit{CEUFS}-Fiche\ fillière.\ \underline{https://www.franceagrimer.fr/content/download/66423/document/FICHE\%20FILIERE\%200EUF\%202021.pdf}$

²⁸ ITAVI (2017). Les filières cunicoles au sein de l'Union européenne. https://www.franceagrimer.fr/fam/content/download/54250/document/Fili%C3%A8re cunicoles UE VF.pdf?version=6

²⁹ Agreste (2020) *Produits agroalimentaires*.

		of consumption between 2009 and 2019 was 2.5%. Their consumption has grown by 2% between 2018 and 2019, which represents 2.4 kgec per capita ²⁹ .	
Production & Characteristics	In 2019, France was the third biggest producer of pig meat in the EU (with 2.2 million tonnes). 9.4 % of the EU's pig population was hosted by France in 2019 ³⁰ . The continuous concentration of the sector leads to high animal densities in some regions and decreasing rates in others. Especially in Brittany, the livestock density is very high while the number of pigs has reduced in mountain areas. In 2015, pig farms consisted on average of 3.4 livestock buildings for an average surface area of 566 m ²²⁰ .	In 2019, France produced 14% (928,000 tons) of European eggs, making it the biggest egg producer in the EU ³¹ . The laying hen production is regionally concentrated. In 2018, around 42% of laying hens were raised in Brittany ³² . The production is also concentrated at farm level. Overall in 2016, 70% of laying hens were found on 12% of the farms with more than 50,000 individual animals ²⁰ . 301,000 tonnes of egg products were produced in France in 2019. Industries transformed 37% of the production of this egg into egg products for the food and the catering industry ²⁷ .	In the EU, rabbit farming is highly concentrated in three countries, which represent 83% of total EU production. France is the second-biggest producer after Italy, with 29 million rabbits slaughtered in 2016 ³³ . Similar to laying hen and pig production, rabbit production is concentrated in certain regions. The regions Pays de la Loire, Brittany and New Aquitaine concentrate two-thirds of the animal production ²⁰ .
Animal welfare aspects	In France, 95% of pigs are raised in indoor buildings. Their beddings are made up of	In 2020, France farmed 36% of its laying hens in enriched cages, 23.2% in free-	The share of alternative housing systems for rabbits compared to conventional

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³⁰ Augère-Granier, M.-L. (2020). *Le secteur de la viande porcine dans l'Union européenne*. EPRS - Service de recherche du Parlement Européen. https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/652044/EPRS_BRI(2020)652044_FR.pdf

³¹ ITAVI (2020) Situation du marché des œufs et ovoproduits Édition avril 2020. https://www.ovocom.fr/wp-content/uploads/2020/05/2020-04 note conjoncture oeuf.pdf

³² Agreste, Draaf Bretagne, statistique agricole annuelle définitive 2000 - 2015, semi-définitive 2016

³³DG Health and Food Safety (2017) *Overview report; Commercial Rabbit Farming in the European Union.* European Commission. https://ec.europa.eu/food/audits-analysis/overview reports/act_getPDF.cfm?PDF_ID=1193

fully slatted floors³⁴ without straw (natural element vital for pigs welfare)¹⁸ and 99% of pigs tails are routinely docked³⁵. Regarding sows, around 90%³⁶ of pregnant sows spend the first four weeks of their gestation in gestation crates and 85% are then placed in farrowing crates¹⁸ in which sows have very little space to move. French regulation requires a minimum space of 0.65 m² per pig for a weight between 85 and 110 kg³⁷. There is no legislative step to improve living conditions of sows above the EU standards, contrary to the Netherlands (ban on fully slattered floor and limitation on gestation cage up to 72 hours), Germany (progressive ban on cages for gestation and farrowing sows,) and Sweden³⁸.

range ³⁹,16% in organic systems and 19% in barn systems¹⁷. France makes a significant contribution to the production of alternative eggs in Europe. According to the 2018 figures, it accounts for 31% of European organic laying hen numbers and 15% of free-range hens³¹. The share of French laying hens in alternative rearing has doubled in 10 years³¹.

Regarding egg products, the share of eggs from alternative farms increased from 10% in 2011 to 36% in 2019: 17.5% of egg products are from hens raised on barns, 15.9% are from free-range hens and 2.2% are from organic farming⁴⁰. 64% are still coming from hens raised in cages.

battery cages in France is quite low, with a 3-4% (but slowly increasing) share of pen housing systems³³. The surface provided to individual animals is only just above 500cm² in France⁴¹. At the moment, higher welfare production is based on national production protocols, such as *Label Rouge*, or organic production. However, rabbit welfare will be included in the new EU organic farming Regulation (Regulation 2018/848), which is yet to come into force.

³⁴ A kind of slat (often made of metal) forming a platform isolated from the ground, to allow water and other waste to drain away.

³⁵ European Commission (2019) Evaluate member state activities to prevent tail-biting and avoid routine tail-docking of pigs. Final report of an audit carried out in France from 17 June 2019 to 21 June 2019. https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=47557

³⁶ Ramonet, Y. et al (2018) Les truies libres en maternité : modalités de logement et de conduite, performances, conditions de travail et bien-être. https://hal.archives-ouvertes.fr/hal-01985343/document

³⁷ Legifrance (2003) Arrêté du 16 janvier 2003 établissant les normes minimales relatives à la protection des porcs. https://www.legifrance.gouv.fr/loda/id/LEGITEXT000005633899/

³⁸ Germany voted last year a ban on cages for sows (farrowing and gestation) with 8 to 15 years of implementation and Sweden has banned the sow stall and farrowing crate in 2015

³⁹ In free-range systems, hens are housed in barns (with identical indoor conditions to barn systems), but during daylight hours they also have access to an area of outdoor pasture of at least 4m2 per hen (Regulation 589/2008 — marketing standards for eggs). Organic systems are a specific form of free-range systems. Legal requirements are set out under the livestock rules of the EU organic Regulation. Under Regulation 834/2007 (primary legislation) and Regulation 889/2008 (secondary legislation) hens also have outdoor access but live in smaller flocks and have more space indoors. A maximum of 3,000 laying hens is housed per compartment and at densities of no more than 6 non-beak-trimmed hens per m2.

⁴⁰ SNIPO (2019) http://www.snipo.com/nos-savoir-faire#:~:text=Dans%20le%20secteur,d'%C3%A9levages%20biologiques.

⁴¹ Trocino A., Xiccato G. (2006) *animal welfare in reared rabbits: a review with emphasis on housing systems.*https://www.researchgate.net/publication/50841150 Animal welfare in reared rabbits A review with emphasis on housing systems

	In 2018, a report of the European Court of Auditors (ECA) has denounced the poor conditions in which sows and pigs are kept in France ³⁵ .	The European Commission (EC) also recommended that France includes and improves the welfare of laying hens in its CAP strategic plan, following the ECA report on animal welfare ³⁵ .	
Building infrastructure	More than half (56%) of pig-breeding buildings were built after 2000. However the average age of breeding buildings is around 22 years ⁴² and in 2010, the building chain (maternity, post-weaning, fattening, gilt and sow rearing) was estimated as inadequate in many farms in France. The need to modernize and bring pig buildings up to standard has been calculated between 2.6 and 2.9 billion Euros ⁴³ (RMT, 2010).	The European Directive 1999/74/EC banned the breeding of laying hens in conventional cages and established minimum standards for enriched cages. In 2012, France was still not in compliance with the new criteria ⁴⁴ and the situation is still unclear at this date even if in a report dated from 2018, the ECA stated that the ban on unenriched cages for laying hens was "implemented effectively by the Member States" Member States and Parliament voted to ban the construction or refurbishment of any building using cages for laying hens. This moratorium was intended to result in a decree but it has still not been published so that in May 2021, the Council of State	

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⁴² Bertin, C. & Ramonet, Y. (2015). *Etat des lieux des bâtiments d'élevage de porcs en Bretagne chez les naisseurs-engraisseurs en 2015.* http://www.journees-recherche-porcine.com/texte/2016/economie/e1.pdf

⁴³ RMT (2010) Enjeux et perspective autour des bâtiments d'élevage. http://www.rmt-batiments.org/IMG/pdf/RMT-bat Enjeux-Perspective-Batiments Synthese version-finale-Dec2010 .pdf

⁴⁴ ECA (2018) Animal welfare in the EU: closing the gap between ambitious goals and practical implementation. https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=47557

		enjoined the government to issue the decree within 6 months or face a fine ^{45, 46} . Room for improvement has been identified in the past around the reduction of energy consumption ⁴³ .	
Trade dynamics	France has a balanced import/export ratio of pork-derived meat products. In 2019, France reported an export volume of 690 000 TEC ⁴⁷ compared to an import vol of 567 000 TEC, which originated almost exclusively from other EU countries ²⁰ . France was the 10 th biggest exporter of pork meat in 2019 ⁴⁸ .	France was a net importer of eggs from the mid-1990s until 2020 due to the COVID-crises which impacted the international trade supply chain. Eggs and egg products exportations have both increased in volume and in value, and the trade balance shifted from negative to positive. Most of the trade now takes place within the EU ³¹	French rabbits are mostly consumed domestically, which makes producers less dependent on foreign trade, while at the same time this is a threat for producers given the decline in consumption ²⁸ . Exported products mainly go to other EU countries, with one third going to Italy. Belgium supplies more than 2/3 of imports ²⁰

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⁴⁵ Conseil d'Etat (2021) Élevage de poules en batterie : le Gouvernement a 6 mois pour prendre le décret permettant leur interdiction effective. https://www.conseil-etat.fr/actualites/elevage-de-poules-en-batterie-le-gouvernement-a-6-mois-pour-prendre-le-decret-permettant-leur-interdiction-effective

⁴⁶ The decree was finally published on 15 December 2021. However, it limits the definition of infrastructure redevelopment so that only new buildings or extensions are prohibited. As renovation is not included, France retains its capacity to produce in cages.

⁴⁷ Tonne equivalent

⁴⁸ Ifip (2020) Commerce mondial du porc en 2019 - La Chine rafle le porc européen. https://ifip.asso.fr/documentation/36254-commerce-mondial-du-porc-en-2019-la-chine-rafle-le-porc-europeen/

Sector	structure
& orga	nisation

re Cooperatives play a highly important role in the French pig sector. The cooperatives of the pork sector represent 93% of French producers⁴⁹

Substantial portions of the poultry chain are integrated in France, which means layer management, feed supply, packing, processing and marketing are often managed by a single company or cooperative. France is an exception here as in most EU countries, farmers are more self-reliant and bear the full risk of changes in input and output prices⁵⁰

France has very strong farmers' cooperatives in charge of marketing and connecting farmers with processors³³. 90% of French rabbit breeders are part of such a cooperative. These groups are almost all linked to feeding manufacturers, offering their members better prices and delivery conditions, while generally not obliging them to buy their feed from their cooperative only. Additionally, this structure allows producers to negotiate conditions with slaughterhouses collectively and to better plan production²⁸.

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⁴⁹ La Coopérative Agricole (2021) *Les éleveurs de porcs appellent à soutenir Le Porc Français*. https://www.lacooperationagricole.coop/fr/actualites/les-eleveurs-de-porcs-appellent-soutenir-le-porc-français

⁵⁰ Augère-Granier (2019). The EU Poultry Meat and Egg Sector: Main Features, Challenges and Prospects. https://www.europarl.europa.eu/RegData/etudes/IDAN/2019/644195/EPRS_IDA(2019)644195_EN.pdf

4. OPPORTUNITIES AND BARRIERS ANALYSIS

4.1 Barriers to implementing a cage-free transition in France

Table 3: Barriers to implementing a cage-free transition in France

	Cross-cutting	Pigs and sows	Laying hens and poultry	Rabbits
Regulatory	Common Agricultural Policy (CAP) supports has not provided sufficient safeguards to ensure that only sustainable livestock production systems are supported. Conventional production can be funded with Pillar 2, while certain coupled payments can lead to intensification as they lack stocking density limits. For the period (2023-2027) the CAP intends to: be results-oriented rather than compliance based, make the link with the SDGs and be in line with 9 specific objectives including three environmental ones. Animal	There are no clear policy incentives to shift from intensive productions using industrial techniques to more animal-friendly production systems. This constitutes a barrier for easing the transition to cage-free animal rearing. Only the organic farming regulation provides the above standard rules for pig production. There are also a very limited number of geographical identifications for pig production that provide higher standards. In	Although the regulatory situation is very similar to the pig sector, the regulatory framework contains positive labelling rules, increasing consumer awareness of improved conditions for laying hens, at least for the fresh eggs market. This is well documented in the evaluation of marketing standards published by the Commission in 2019 ⁵³ , having found that "the rules for indicating the farming methods applied for laying hens (Regulation (EC) No 589/2008) have been effective in promoting animal	A clear barrier to increasing animal welfare standards is the lack of a regulatory framework protecting rabbits ⁵⁴ . This could change as part of the revision of animal welfare regulations at the EU level as announced by the European Commission's Farm to Fork Strategy.

⁵³ European Commission (2020) "Evaluation of Marketing Standards contained in the CMO Regulation, the "Breakfast Directives" and CMO secondary legislation". https://op.europa.eu/s/stbn

 $^{^{54} \ &#}x27;Bien-\hat{e}tre\ animal\ :\ des\ r\`{e}gles\ europ\'{e}ennes\ ambitieuses'\ \underline{https://www.vie-publique.fr/en-bref/276428-bien-etre-animal-des-regles-europeennes-ambitieuses}$

welfare is mentioned among other general societal concerns like food safety and does not constitute a standalone objective as such. Furthermore, studies have shown unbalanced support between objectives that would need serious reallocation to align the policy with the SDGs. For example, it has been shown that the most intensive regions get more CAP support than the extensive farming regions, despite the latter providing more substantial societal benefits⁵¹.

both cases, however, it is left to the individual initiative of the producer to initiate the move. welfare-friendly production methods for eggs, and alternative uses of egg production in the EU,"

The <u>EU promotion program</u> for agri-food has competitiveness and consumer information as objectives, but hardly anything about animal welfare. It is also used to help sectors in difficulties like milk and pigmeat, to boost demand. This is an indirect barrier to a cage-free transition, especially in France which received the largest amount of funding (67,906,145€) for meat and dairy products between 2016

⁵¹ Scown Murray W. et al (2020) "Billions in Misspent EU Agricultural Subsidies Could Support the Sustainable Development Goals" <u>link</u>

16	The	transition	towards	cage-free	farming	in	France
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and 2019 according to a Greenpeace report ⁶⁵ . The Commission has proposed to better align with the Green Deal by ring-fencing 50% of the funding for sustainable products, in particular organic ones, but this was challenged in the European Parliament ⁵² .		
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⁵² European Parliament (2021) *EU agri-food promotion policy: No sector should be left behind, MEPs say.* Press release. https://www.europarl.europa.eu/pdfs/news/expert/2021/2/press_release/20210224IPR98620/20210224IPR98620_en.pdf

Economics	Cage-free systems and other animal welfare conditions tend to increase production costs in the short term. The current context of increasing food prices in 2021 makes it difficult to pass extra production costs onto food retail prices. Without real efforts to account for environmental, health and societal production costs in market prices, this increase in prices and the potential repercussion on consumers are an obstacle ⁵⁵ .	Although extensive indoor pig production costs tend to be higher than industrial pigs rearing systems, there are some savings with more extensive systems. The main challenge in the French case lies with regional specialisation: how to move from intensive pig production highly concentrated in the West part of the country to extensive systems, distributed across the whole territory?	France is the leader in egg production within the EU. The dynamics of the sector are now favourable with sharp increases in organic or freerange production systems and a decline in production from low-cost cage systems. The challenge is to keep the right balance between supply and demand in organic eggs, in particular, to avoid price drops due to over-supply, which could threaten the profitability of the most sustainable systems.	The Belgian example of legally required park systems has shown its limits with breeders unable to make a profit on their investments by a sufficiently high selling price28.
Cost of new investments	The establishment of alternative livestock production systems requires high investments, which farmers have found difficult to finance due to the lack of support, i.e. from banks, and the	Cage-free transition investments in the pig sector are strongly related to the updating of the farrowing systems and upgrading of group housing for pregnant sows related to the European Directive 2008/120/EC.	The experience of bringing farms up to standards in accordance with European Directive 1999/74/EC shows, that a high initial investment to bring French livestock farms into compliance with the ban of conventional cages was	There is a need for further research efforts in order to build a profitable production model that meets societal expectations28.

⁵⁵ Due to externalities, sustainable and healthy food is often less affordable to consumers and profitable for businesses than unsustainable and unhealthy food. https://sc-fss2021.org/wp-content/uploads/2021/06/UNFSS true cost of food.pdf

absence of reliable information on the return on investment.

Evidence suggests that the construction of new alternative pig housing systems is significantly higher than caged systems:

- The investment cost of a free-range farrowing facility has been estimated to be 33% higher compared to a conventional one, as more space is required, and the equipment is more robust36.
- A new single sow housing under organic farming in France has been estimated to be between 53% and 56% more costly than the construction of conventional housing⁵⁶.

The total cost of modernising and upgrading of housing for

required. The overall costs for the sector have been estimated to be 1 billion euros⁵⁸. This includes the conversion of existing cages, renewal of cages as well as construction of new cage buildings.

When estimating the overall higher running costs of alternative housing systems in the laying hen sector, one needs to consider that they exist in a variety of forms. Depending on the type of housing, different levels of overall production costs may occur as part of the transition. P.L.M. van Horne compared costs per housing system in France, based on 2017 baseline data, finding:

 9.5% higher production costs per kg output in barn systems compared to

⁵⁶ Ifip (2020), Les solutions financières pour accompagner l'évolution des élevages de porcs. https://www.franceagrimer.fr/Actualite/Filieres/Viandes-blanches/20202/PUBLICATION-Les-solutions-financieres-pour-accompagner-l-evolution-des-elevages-de-porcs

⁵⁸ CNPO (2016), Plan de filière Œufs. https://agriculture.gouv.fr/telecharger/88270?token=3bf806855fb7ee1015d4d6558dd9e1764b68197e04b67d46e48cbd310d132f59

		sows' breeding and gestation is estimated at €666 million ⁵⁷	caged systems (enriched cages). • 14.4% higher production costs per kg output in free-range systems compared to caged systems (enriched cages). Under the new organic farming regulation (entering into force 1 January 2022), it has been estimated that egg production will be 15% more costly for producers compared to costs under the current organic regulation ⁵⁹ .	
Trade	Imports of meat and products feed containing products forbidden in EU's production and resulting from lower welfare practices (due to lower standards in third-countries) are dragging		France had an egg deficit since the mid-1990s. These imports from Spain (59%) were mainly from caged hens. The situation has been reversed since the COVID crisis, but a negative change in the trade balance could mean a return to the	France is a net exporter of rabbit meat. Its exports have increased by 4% in 2019 compared to 2018 and go mainly to European countries (one third to Italy). Imports mainly come

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⁵⁷ Ifrip (2007) Les bâtiments d'élevage de porcs en France : quel besoin d'investissement au regard de leur état ? https://www.ifip.asso.fr/sites/default/files/pdf-documentations/tp6roguet07.pdf

⁵⁹ ITAVI (2021), Actualités économiques pondeuses, Bien-être & santé des volailles, recueil des présentations. <a href="https://www.itavi.asso.fr/publications/actualites-economiques-pondeuses-bien-etre-sante-des-volailles?search=Actualit%C3%A9s%20%C3%A9conomiques%20pondeuses,%20Bien-

[%]C3%AAtre%20&%20sant%C3%A9%20des%20volailles,%20recueil%20des%20pr%C3%A9sentations%20&order=date

20 | The transition towards cage-free farming in France

prices and quality down and are a clear barrier ⁶⁰ .	previous situation, with a shift towards cage farming 31. International outlets are essential for the French egg industry, which therefore relies on external demand ⁶¹ . from Belgium (Agreste 2019). This export orientation map present an indirect barrier to raising standards for animal welfare.
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⁶⁰ Fondation Nicolas Hulot, Interbev and Insitut Veblen, (2021) Mondialisation: comment protéger l'environnement et les agriculteurs? https://www.fondation-nicolas-hulot.org/mondialisation-comment-proteger-lenvironnement-et-les-agriculteurs/

⁶¹ CNPO (2021) La balance commerciale des oeufs repasse au vert en valeur. https://lesoeufs.fr/blog/la-balance-commerciale-des-oeufs-repasse-au-vert-en-valeur/

4.2 Summary of key barriers to a cage-free transition in France

- A key barrier to implementing a cage-free transition in France is the **high short-term investment costs associated with the change in housing**. Bringing farms up to standards that are in accordance with European Directive 1999/74/EC required a high investment over a 12-year phase out period. In total, through the conversion of existing cages, renewal of- and the construction of new buildings, 1 billion Euros had to be invested, of which 20 million euros was public money⁶². In the longer term, higher production costs also occur, but are likely to be balanced by increased farm-gate and retail prices.
- Another barrier to increasing animal welfare standards is also the lack of a regulatory framework and transparency around the breeding conditions of animals which is particularly relevant for rabbits. This could change as part of the revision of animal welfare regulations at the EU level as announced by the European Commission Farm to Fork Strategy.
- A more indirect but still important barrier is the financial support to currently unsustainable livestock production systems, such as under the Common Agricultural Policy (CAP) or the EU agri-food promotion program. Until now, the CAP has provided coupled support for animal production which can trigger an intensification of the sector. For example, because coupled supports are tied to production, supporting ruminant livestock in this way is likely to raise animal numbers compared to a situation with no CAP subsidies⁶³. Although the new CAP for the period 2023-2027 makes the link with the Sustainable Development Goals (SDGs) and includes an intervention aimed at promoting animal welfare, its practical application through the French National Strategic Plan (NSP) allows business as usual. The draft French NSP appears as a roll-over of the past CAP implementation, which is a missed opportunity for more sustainable farming in France⁶⁴ and supporting cagefree systems. In addition, the EU's agricultural promotion programme supports campaigns promoting meat and dairy products, usually from industrial and intensive systems, rather than environmentally friendly organic

⁶² Sénat Français (2011). Utilisation effective des fonds communautaires d'indemnisation des éleveurs de poules pondeuses. Réponse du Ministère de l'agriculture, de l'alimentation, de la pêche, de la ruralité et de l'aménagement du territoire. JO Sénat du 10/11/2011 – p. 2858. Link

⁶³ Alliance Environnement « Evaluation study of the impact of the CAP on climate change and greenhouse gas emissions : Final report" (2019).

 $[\]underline{http://www.senat.fr/questions/base/2011/qSEQ110719617.html\#: \sim :text=Une\%20somme, par\%20exploitation.}$

⁶⁴Antoine de Ravignan (2021) *La politique agricole a besoin d'un profond changement*. https://www.alternatives-economiques.fr/antoine-de-ravignan/politique-agricole-a-besoin-dun-profond-changement/00100284

products. According to Greenpeace's report "Marketing Meat" (2021) 65, only 4 projects, accounting for 3% of all fundings, exclusively promoted organic meat from 2016-2019.

Imported animal products from third countries produced to lower welfare standards are another barrier frequently highlighted by sector representatives.

⁶⁵ Greenpeace (2021). Marketing Meat. https://www.greenpeace.org/static/planet4-eu-unit-stateless/2021/04/20210408-<u>Greenpeace-report-Marketing-Meat.pdf</u>

4.3 Opportunities and drivers for cage-free farmin transition in France

Table 4: Opportunities and drivers for pigs, laying hens and rabbits in France

	Cross-cutting	The pig sector	The laying hen sector	The rabbit sector
Regulatory	The new CAP offers an opportunity to include targeted measures in the French NSP to support farmers in a transition to better rearing conditions, increased animal welfare and cage-free systems. The NSP could use the ecoscheme in the 1st pillar and foster farm investments to adapt housing to new conditions and go beyond animal welfare legislation. However, the draft NSP does not so far make such use of eco-scheme. The opportunity left would be the approval from the	With the EC's upcoming proposal on sustainable food systems, there is an opportunity for the pig sector (and others) to develop marketing standards and sustainable production norms (like in the poultry sector) so as to inform the whole food chain and the consumer in particular on how the animals have been reared. It will be essential to the extent those norms to imported products.	In its 2017 programme, E. Macron pledged to ban the sale of eggs from caged hens to consumers by 2022, but 36% of laying hens are still in cages. In 2018, France voted to ban the construction or refurbishment of any caged buildings for laying hens. This was to be translated into an application decree relating to the new article L214-11 of the rural code, which hasn't been done. After intervention by the Council of State, the government has until	There is almost nothing regarding rabbit welfare. In 2021, the EC positively responded to the European Citizen Initiative 'End the Cage-Age'. The EC announced a legislative proposal in 2023 to ban cages by 2027 for several farm animals including rabbits ⁶⁸ .

⁶⁸ EC (2021) Initiative citoyenne européenne: la Commission propose la suppression progressive des cages pour les animaux d'élevage. European Commission website. https://ec.europa.eu/commission/presscorner/detail/fr/ip 21 3297

This legislative proposal also concerns laying hens, sows, calves, rabbits, pullets, breeding laying hens, breeding broilers, quails, ducks and geese

European Commission scheduled for 2022, and later on also a potential revision of the NSP. France can also use the funding opportunities associated with Measure (M) 14 dedicated to animal welfare from the CAP's second pillar (European agricultural fund for rural development, or EAFRD). This measure was not programmed by any of the French regions in their Rural Development Programme in the 2014-2021 period, even though EAFRD's co-financing opportunities constitute "the most important source of financial funding for animal welfare activities in the EU." according to the European Commission ⁶⁶ . Additional opportunities exist within M4 (investments in physical			
	scheduled for 2022, and later on also a potential revision of the NSP. France can also use the funding opportunities associated with Measure (M) 14 dedicated to animal welfare from the CAP's second pillar (European agricultural fund for rural development, or EAFRD). This measure was not programmed by any of the French regions in their Rural Development Programme in the 2014-2021 period, even though EAFRD's co-financing opportunities constitute "the most important source of financial funding for animal welfare activities in the EU." according to the European Commission ⁶⁶ . Additional opportunities exist within M4	the Decree (see footnote	

⁶⁶ EC (2021). Evaluation of the European Union Strategy for the Protection and Welfare of Animals 2012-2015. In European Commission (ed). SWD (2021) 77 final, Brussels. https://ec.europa.eu/info/law/better-regulation/

	assets), M11 (organic farming), and M10 (agrienvironment-climate). France can also link the payment to compliance with label specifications as the province of Baden-Wuerttemberg (DE) does ⁶⁷ . The cage-free upcoming proposal (scheduled for 2023) aiming at phasing out the cage system by 2027 is another opportunity and the draft NSPs will have to be brought into line with this new EU law.		
Financial instruments and public market	The French "EGalim" law of 2018 foresees that "prices should take account of production costs" to protect farm incomes, with mixed outcomes, according to the sector. This law is	The French recovery Plan dedicates 100 million ofain euros to animal welfare (to be shared with biosecurity) and 130 other million of euros is earmarked for slaughterhouse modernisation. This amount	

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⁶⁷ The province of Baden-Wuerttemberg (DE) for example has linked the payment to compliance with the "Für Mehr Tierschutz" label specifications for fattening pigs and broilers, for example for pigs, offering the animals more space and handling materials (straw, bale, wood), or even access to the outdoors and a straw bedding area (premium level of the label). The subsidy is €9 or €14 per pig, depending on the requirements of the entry level and the premium level of the label (FranceAgriMer, 2020).

currently under revision in 2021, as "EGalim 2" ⁶⁹.

The French Recovery Plan, which was presented in September 2020, offers relevant funding opportunities as part of the plan for agricultural and agri-food sectors, to achieve a sector transformation. Funding is available to address economic and social, as well as environmental and sanitary challenges the sector faces. Animal welfare is one of the specifically mentioned criteria with biosecurity.

of funding can be set in contrast with the German recovery plan that allocates 300 million euros to the refurbishment of animal stables to increase animal welfare ⁷⁰.

The EU green public procurement criteria for food and catering services count animal welfare conditions for shell eggs

⁶⁹ Girard L., Prudhomme C., (2021) « La remuneration des agriculteurs au cœur du débat de la loi Egalim 2 » . https://www.lemonde.fr/economie/article/2021/09/18/la-remuneration-des-agriculteurs-au-c-ur-du-debat-de-la-loi-egalim-2 3234.html

⁷⁰ Green recovery Tracket (2021) *Germany*. https://www.greenrecoverytracker.org/country-reports/germany

but also meat. By implementing these criteria in public canteens, retirement homes etc, France could increase the proportion of animal products complying with higher animal welfare standards than those set by the law. The EGALIM law requires that at least 50% of sustainable and quality products, including at least 20% of organic products, must be served in collective catering meals from 1 January 2022 onwards. The Climate Law, passed in April 2021, reinforces this decision by adding that at least 60% of beef, pork, sheep and poultry, as well as fishery products, must be of "quality" within the meaning of the Egalim Law.

Research & Innovation from public and private sector

Horizon Europe (cluster 6) focus on good practice examples as well as practical tools and guidelines that can increase farming animal welfare.

A labelling association (Etiquette Bien-être animal - AEBEA) joined by a consortium association, "LIT Ouesterel" (launched by researchers and industry players with regional funding), and developed a technical reference framework for improved animal welfare during the rearing, transport and slaughter in the poultry sector. They are developing similar guidelines for the pig sector (end 2021). The different stakeholders (research, industry, farmers)

The <u>BEEP animal welfare</u> <u>assessment tool</u>, supported by IFIP makes farmers aware of animal welfare issues and helps them with improvements. The next step is to develop an electronic application that can be upscaled.⁷²

FranceAgriMer launched the EVOLUTION project, producing an inventory of avian housing, evaluating their economic, social and environmental performance.

A self-assessment tool has been developed by ITAVI, the 'protocol EBENE', for voluntary use by farmers to measure animal welfare⁷³.

An innovative project run by ITAVI, APESA and INRA on the breeding of the future in a concerted approach between professionals, researchers, citizen-consumers and NGOs 28.

A project called 'Living Lab Lapins' aims to define by the end of 2021 a socially accepted breeding system where rabbits can better express their natural behaviours (training, gnawing, pouncing) ⁷⁴.

⁷² Courboulay et al. (2020), BEEP: An advisory pig welfare assessment tool developed by farmers for farmers. https://www.sciencedirect.com/science/article/abs/pii/S1871141319316841

⁷³ Based on 4 criteria: good feeding (i.e. provision of infrastructure to facilitate feeding); good health (i.e. regular access to health care); good environment (i.e. clean bedding); appropriate behavior (i.e. facilitating the expression of certain natural behaviors) »

Warin et al. (2018) Protocole EBENE, guide pour les utilisateurs. https://www.itavi.asso.fr/content/protocole-ebene-guide-pour-les-utilisateurs

⁷⁴ MAA (2019) Le bien-être et la protection des lapins. Ministère de l'Agriculture et de l'Alimentation website. https://agriculture.gouv.fr/le-bien-etre-et-la-protection-des-lapins

	brought together in the association Lit Ouesterel also launched welfare innovation labs/living labs in Western France. ⁷¹		
Health	Health considerations have become a key factor driving the decrease in meat consumption among French citizens. The official French national guidelines on diets and physical activity from the year 2019 recommend a reduction in meat consumption compared to current levels and thereby are an indirect opportunity for the livestock sector to increase its extensive production methods. However, the recommended quantity is	Knowledge exchange and best practices groups such as the EU Pig Innovation Group, where best practices in terms of reducing antimicrobial resistance etc. are showcased, provide an opportunity to improve the animal welfare of the whole sector.	In 2012, the French rabbit industry, under the impulse of CLIPP (rabbit Interprofession), has collectively committed itself to reducing the use of antibiotics. However, it seems that the use of antibiotics is still very high (about 6 times higher than the global level for all livestock species combined). An adaptation of the production system could reduce the level of antibiotic use in the rabbit sector.

⁷¹ LIT Ouesterel (2020), Rapport d'activité. https://www.assolitouesterel.org/post/association-lit-ouesterel-publication-du-rapport-d-activit%C3%A9-2020

⁷⁵ Ministère de l'agriculture et de l'alimentation (2016), Baisse de la consommation de protéines animales.

https://agriculture.gouv.fr/telecharger/84019?token=ad1d7dc28e1f65befa2dcaf2098e8ba1c5c4207f34e567f07fdbb95a8a6efe57

⁷⁶ Sante Publique France (2019), Recommandations sur l'alimentation, l'activité physique & la sédentarité pour les adultes. https://www.santepubliquefrance.fr/content/download/35744/683783

Additionally, France has a national plan, Ecoantibio 2, targeting the reduction of the use of antibiotics and the risk of antimicrobial resistance. According to official statistics, it led to a reduction of antibiotics usage in all animal husbandry practices by 45% over the last 8 years.

The pandemic increased the concerns around intensive livestock production and risks of zoonosis diseases. The IPBES report 'escaping the era of pandemics' stresses the importance of moving away from such types of production. Such considerations should be

	taken into account in the national COVID-19 recovery strategies.			
Animal Welfare	In 2020, in France, a "Référendum d'initiative partagée" ⁷⁷ was initiated on the use of cages (among other animal welfare issues) and the end of intensive farming by 2040. While the barriers are high and may not be met, 140 French parliamentarians are already committed, indicating a relatively high political will among French parliamentarians.	Increasing experimentations are taking place across the EU to develop free-farrowing systems, Those systems reduce sows' stress and promote piglet birth.	Systems with winter gardens have been developed for laying reared in extensive indoor systems. This covered outdoor extension provides natural light, supplementary foraging materials and dustbathing opportunities ⁷⁸ . These systems are between the barn and free-range breeding and are coded "2+".	97% of rabbits are farmed in cages. Some producers have developed a new system in which the rabbits would no longer be in cages but in 10m³ floor pens, with burrows and resting areas, which would allow them to run, jump and burrow. This can be seen as an important field experience. Since June 2019, three major players in the French rabbit industry, have launched the "Lapin & Bien" project for an alternative method of farming rabbits.

⁷⁷ A procedure that allows a referendum to be held on a legislative proposal, introduced by at least 1/5th of parliamentarians and supported by 1/10th of the electorate.

⁷⁸ CIWF (n.d) *Higher welfare systems for laying hens – practical options*. Compassion in world farming. https://www.compassioninfoodbusiness.com/resources/laying-hens/higher-welfare-systems-for-laying-hens/

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The Industrial Emissions
Directive 2010/75/EU
regulates pollutant
emissions from industrial
installations. Intensive
livestock farms (with more
than 40,000 poultry or 2000
fattening pigs) are subject
to it. France has the highest
total number of farms
requiring a permit
(reference period 2012–
2013): 3 189 in a total of
which 2 515 are poultry,
589 pigs, and 85 sows.

The EU National Emission Ceilings Directive (2016/2284/EU) obliges all Member States to reduce ammonia emissions by 6% by 2020, relative to 2005 levels. Countries such as France with a large number of (intensive) animal farms (also among the largest emitters of ammonia) will A comparative perspective with Dutchbroiler systems makes the environment and welfare synergies and trade-offs apparent: a recent study showed that that higher ammonia and particulate matter emissions per animal under extensive regimes compared to conventional ones are offset by a lower stocking density.⁸⁰

⁸⁰ Vissers et al. (2021) 'Analysis of synergies and trade-offs between animal welfare, ammonia emission, particulate matter emission and antibiotic use in Dutch broiler production systems'. https://doi.org/10.1016/j.agsy.2021.103070

need to make changes to their livestock production to achieve the targets. France aims to reduce ammonia emissions by 4% between 2020 and 2024, by 8% between 2025 and 2029 and by 13% from 2030 onwards, compared to the year 2005⁷⁹. However according to the European Commission, France is at high risk of not meeting its emission reduction commitments, both for the period 2020-2029 and post-2030 (EC, 2020).

The SNBC also aims for an 18% reduction in agricultural emissions by 2030 compared to 2015. As 45% of agricultural greenhouse gas (GHG) emissions are methane, this legislative objective could

⁷⁹ MTES (2020) *Stratégie Nationale Bas Carbone*. https://www.ecologie.gouv.fr/sites/default/files/2020-03-25 MTES SNBC2.pdf

	also impact livestock farming.			
Labelling	A proposal for an environmental labelling scheme named "Planet Score" include animal welfare criteria with additional information on the Method of Production. As part of the Farm to Fork Strategy, the European Commission will "consider options for animal welfare labelling to better transmit value through the food chain. To this end, the Commission will conduct an external study foreseen to start the first half of 2021."81	The association "Etiquette Bien-Etre animal » is developing a label dedicated to pig welfare for 2022.	The "Etiquette bien-être animal" is implemented by several big retailers such as Carrefour and gives a clear score on housing and overall welfare conditions of broilers throughout their life.	

⁸¹ EC (n.d) Animal welfare labelling. European Commission website. https://ec.europa.eu/food/animals/animal-welfare/other-aspects-animal-welfare/animal-welfare-labelling en

4.4 Summary of key opportunities to a cage-free transition in France

- Regulatory: The future CAP and in particular the CAP strategic plans at national level (NSP) represent an opportunity to better use EU agricultural subsidies for the transition towards cage-free farming. The new CAP introduces new instruments indeed such as eco-schemes which can be used to improve animal welfare. That however relies on the choices made by the Member State. France is already advanced with its NSP and it does not seem that it has decided to make such use of the ecoscheme. The European Commission will however be responsible for the approval for all the NSPs in 2022 and can challenge MS choices against their needs, priorities and EU legislative framework.
- **Financial instruments and public market:** The French "EGalim" law of 2018, currently under revision, foresees that "prices should take account of production costs" to protect farm incomes, with mixed outcomes, according to the sector. This could help to bear the additional costs incurred by the transition to cage-free farming but also help internalize better the environmental and health costs of unsustainable food deriving from intensive production systems. The EU Green Criteria for public procurement in the food sector and the Recovery Plan funds focusing on and dedicated to animal welfare can also be used to support this transition.
- **Innovation & research:** Research and Innovation projects in the frame of Horizon Europe (cluster 6) can, depending on their use, offer good practice examples as well as practical tools and guidelines to farmers who would like to increase their on-farm animal welfare⁸². However, most of them are industry oriented. Some tools have been developed to facilitate the labelling of production without elaborating objectives that would allow to change the orientation and the logic of production.
- Health consideration is increasing among citizens and is now a key driving
 the decrease in meat consumption among French citizens. Less meat
 consumption and demands for better and healthier meat products should
 support also support the transition towards cage-free-farming.
- **Environmental regulation:** environmental regulations can be a driver of a reduction in livestock number and density reduction and therefore an

Institute for European Environmental Policy (2021)

⁸² On the sub area of information "agriculture, forestry and rural areas", research and innovations focus on animal production systems to "decrease the role of the livestock sector in the depletion of natural resources.". It also aims at exploring the "possibilities for improving animal welfare, for example, through more appropriate management (including human animal relationship in farming)"

opportunity for cage-free transition. They are mostly set at the EU level as is the case for ammonia emissions.

Labelling: new consumer information scheme aim at taking into account animal welfare and could help consumers in their choices for cage-free animal products.

