June 2025

Report

Improving animal welfare through the Common Agricultural Policy (CAP)

Assessment of selected schemes in the national CAP Strategic Plans 2023 - 2027

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ABBREVIATIONS AND DEFINITIONS

ASF	African Swine Fever
AMR	Antimicrobial resistance
CAP	Common Agricultural Policy
COOP	CAP support schemes for cooperation
CSP	CAP Strategic Plan
DDD	Defined Daily Dose
EFSA	European Food Safety Authority
ENVCLIM	CAP support schemes related to environment, climate, and animal welfare
EAGF	European Agricultural Guarantee Fund
EAFRD	European Agricultural Fund for Rural Development
EU	European Union
GAEC	Good Agricultural and Environmental Conditions (CAP conditionality)
HNV	High Nature Value (biodiversity-rich farming systems)
INVEST	CAP support schemes related to investment
LSU	Livestock unit (standard measure to compare livestock numbers)
MS	Member States
PLN	Polish Zloty (currency)
UAA	Utilised agricultural area (total area taken up by arable land, permanent grassland, permanent crops and kitchen gardens)

EXECUTIVE SUMMARY

Farmed animal welfare is a growing priority for EU citizens, with 91% of respondents in a recent Eurobarometer survey stating that it is important to protect their welfare (European Commission, 2023a). Despite this strong public mandate, farm animal welfare across the European Union remains inadequate. A 2022 **Fitness Check concluded that many farm animals across the EU are still not kept in acceptable welfare conditions** (European Commission, 2022). The 2023–2027 Common Agricultural Policy (CAP) presents a renewed opportunity to address these gaps through Member State-designed CAP Strategic Plans (CSPs). These include instruments such as eco-schemes, investment support, and agri-environment-climate commitments.

This report provides the first EU-wide review of how the national CSPs incentivise actions to improve animal welfare in the 2023–2029 programming period. It evaluates both the design and ambition of national measures and presents concrete policy recommendations for both the EU institutions and Member States.

Key findings

- A total of **136 animal welfare-relevant support schemes** were identified across Member States, including mostly **eco-schemes, investment support, agri-environment-climate commitments,** and to a lesser extent **cooperation measures**, and **knowledge-transfer tools**.
- **Over €35 billion** is earmarked for support schemes that relate to animal welfare and health. However, a large share of this funding goes to schemes where the actual welfare impact is limited or uncertain or focused primarily on productivity or disease control.
- **Cattle** are by far the most frequently targeted species, followed by **pigs** and **sheep.** In contrast, poultry and rabbits, which are more often subject to intensive rearing systems, are less frequently covered.
- Most **schemes focus on improving animal health, followed by measures to improve the living environment** (such as increasing the space available per animal), while measures specifically promoting **natural behaviour** (e.g. provision of enrichment materials, adequate space, elimination of tethering or cages) are often lacking or insufficient.

The design and ambition of welfare schemes vary widely between Member States. Many measures fall short of delivering meaningful change due to vague requirements

or insufficient incentives. A qualitative evaluation of the main practices supported through the CSPs shows:

- **Grazing practices are widely supported** and generally considered to contribute positively to animal welfare, especially when minimum pasture access durations are enforced. However, many farmers already implement grazing practices, raising questions about the additional impact ("conversion effect") of these schemes.

- **Increasing space and reducing stocking density** are frequently incentivised, yet most schemes **propose only modest improvements beyond minimum legal requirements**. Consequently, these measures are unlikely to deliver substantial welfare benefits, especially in the case of pigs and cattle.

- Many Member States provide support for **actions to improve animal health**, typically including preventative measures such as farm-level **health plans and biosecurity strategies**.

- **Provision of enrichment materials**, especially for pigs and poultry, recognised as a **highly relevant welfare practice to support natural behaviours**, is supported by only a small number of schemes. Requirements often **lack the necessary level of detail** to judge whether these exceed legal obligations.

- **Only a handful of schemes** directly support the **transition away from cages** for laying hens or sows, despite significant societal and scientific backing for this shift.

- **Other practices which have demonstrated to considerably improve animal welfare**, such as reducing ammonia concentrations through better ventilation, adapting lighting to animals' natural day-night cycles, managing growth rates through breed selection, using pain relief during castration, phasing out farrowing crates, and eliminating long-term tethering, **are only sporadically supported by national CSP schemes**.

Conclusions

Despite the CAP's potential, current implementation through national CSPs falls short of delivering systematic, high-welfare reform. Several shortcomings are observed:

- **Low ambition**: Many measures support practices already widely adopted (e.g. seasonal grazing) or are too weakly defined to guarantee real change.

- **Lack of clear EU objectives and targets**: Without EU-wide animal welfare targets, Member States pursue divergent levels of ambition, undermining coherence and cross-border progress.
- **Lack of investments in structural changes:** Few schemes offer the long-term, structural investments needed for higher welfare systems, such as pasture infrastructure or free farrowing facilities.
- **Underutilisation of eco-schemes**: Animal welfare is underrepresented within eco-schemes, despite being a key new instrument in the 2023 CAP reform.
- **Insufficient use of conditionality:** Harmful or outdated practices (e.g. tail docking, long-term tethering) continue to receive support in the absence of strengthened baseline requirements.

Recommendations

This review shows that. although **the tools to advance animal welfare already exist within the CAP framework**, the existing landscape of support schemes for animal welfare is unlikely to deliver significant progress. The following recommendations outline how both the EU and its Member States can address these gaps to ensure that CAP funding delivers on public expectations, aligns with scientific evidence, and supports the transition to more humane and sustainable farming systems.

EU level

- **Support structural change through CAP funding.** Prioritise long-term, high-welfare investments (e.g. pasture access, enriched housing) over short-term compensation schemes, guided by clear EU objectives and reinforced conditionality.
- **Set EU-wide animal welfare objectives and targets.** Establish time-bound goals (e.g. phasing out cages or tethering) to provide clarity and consistency across Member States.
- **Recognise animal welfare as a standalone CAP objective**. This would improve coherence and ambition in national plans
- **Ensure proper monitoring through both quantitative and qualitative indicators.** To adequately track progress toward meeting animal welfare objectives, the CAP performance monitoring framework should be reworked to combine both quantitative and qualitative indicators.

- **Strengthen minimum welfare requirements**. Introduce baseline animal welfare standards under CAP conditionality, including bans on harmful practices and eligibility limits based on breed suitability. If conditionality is further weakened through ongoing simplification initiatives, stronger legislation will be needed.

Member State Level

- **Improve needs assessments in Strategic Plans.** Identify overlooked welfare issues, such as tethering, and address them systematically.
- **Estimate financial needs and tailor support.** Align payment levels with the real costs of achieving welfare goals, using structural investments where appropriate.
- **Include at least one animal welfare eco-scheme.** Ensure CSPs feature dedicated measures and combine annual payments with investment support for higher-welfare transitions.
- **Shift funding toward higher-welfare systems**. Prioritise support for free-range and outdoor-access farming over intensive models.
- **Follow scientific guidance.** Align scheme requirements with EFSA recommendations and define them clearly—for example, specifying bedding quantity and frequency.
- **Strengthen enforcement.** Move beyond passive record-keeping by requiring verifiable implementation and active monitoring of welfare improvements.

1. INTRODUCTION

Farmed animal welfare is an increasing concern for people across Europe. According to a recent Eurobarometer survey (European Commission, 2023a), 91% of Europeans consider it important to protect the welfare of farmed animals[1]. Interestingly, 84% of Europeans believe that the welfare of farmed animals in their country should be better protected than it is today[2], a sentiment that has slightly increased since a similar survey was conducted in 2015.

Box 1. Defining animal welfare

From the Five Freedoms to the Five Domains model

According to the World Organisation for Animal Health (WOAH, 2016), an animal enjoys good welfare when it is healthy, comfortable, well-fed, safe, able to express its natural behaviours, and free from pain, fear, and distress. This definition is rooted in the **Five Freedoms** concept, developed by the UK Farm Animal Welfare Council in 1965, describing the accepted societal standards of the care animals should experience when under human control. These are freedom from hunger and thirst; fear and distress; heat stress or discomfort; pain, injury, and disease; and the freedom to behave naturally. In recent years, thinking around animal welfare has evolved. The focus is shifting from simply preventing suffering to actively promoting wellbeing by acknowledging the relationship between physical factors and the mental state of an animal. The **Five Domains** model[3] is now widely used to describe and assess animal welfare. According to the model, animal welfare is shaped by good nutrition, a healthy physical environment, strong health, positive behavioural interactions, and a sound mental state (Four Paws, 2023).

[1] To the question, *"In your opinion, how important is it to protect the welfare of farmed animals (e.g., pigs, cattle, poultry, etc.) to ensure that they have decent living conditions?"*, 52% of respondents replied, "Very important," and 39% responded "Somewhat important."

[2] To the question *"Do you believe that in general the welfare of farmed animals in (OUR COUNTRY) should be better protected than it is now?"*, 45% of respondents replied "Yes, certainly", and 39% responded "Yes, probably".

[3] Developed by DJ Mellor, see Mellor (2016)

Since adopting its first animal welfare legislation in 1974[4], the European Union (EU) has established a comprehensive legal framework to safeguard the welfare of animals. This legislation mostly concerns farmed animals, which is due to the competencies of the EU in the field of agriculture[5]. Today, **EU animal welfare standards**, **regarded as some of the highest in the world** (European Court of Auditors, 2018), are set out through a framework of interlinked Directives and Regulations. These include a horizontal Directive establishing general rules for the protection of animals kept for food, wool, skin, fur, or other farming purposes[6], specific Directives for animals such as pigs[7], laying hens[8], meat poultry[9], and calves[10] which govern conditions such as space, enrichment, and handling, and Regulations addressing animal welfare during transport and at the time of slaughter.

Over the past decade, the EU has made significant strides in animal welfare: Commission funding has enabled the training of over 2,000 veterinarians on animal welfare practices, a ban on conventional battery cages for laying hens has been in place since 2012, and legislation to phase out individual stalls for pregnant sows was introduced in 2013[11]. However, a 2022 **Fitness Check concluded that many farm animals across the EU are still not kept in acceptable welfare conditions**. It called for updated legislation, aligned with current science, clearer enforcement, and an extension to more species (European Commission, 2022). At the time of writing, the Commission was in the process of carrying out a review of the pieces of legislation mentioned above and is considering the introduction of an animal welfare labelling system.

Improving animal welfare through the Common Agricultural Policy

The Common Agricultural Policy **(CAP) serves as a key policy instrument to encourage and financially support higher animal welfare standards** on farms across the EU. Animal welfare became part of the Common Agricultural Policy (CAP) framework in the early 2000s. The first major change came with reforms for the CAP period 2000 - 2006, which introduced animal welfare as one of the conditions for receiving certain types of rural development support. Subsequent reforms within this programming period introduced the concept of "cross-compliance" with statutory

[4] Council Directive 74/577/EEC on stunning animals before slaughter
[5] Article 4, (d), Treaty on the Functioning of the European Union, https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:12012E/TXT:en:PDF
[6] Directive 98/58/EC concerning the protection of animals kept for farming purposes
[7] Directive 2008/120/EC laying down minimum standards for the protection of pigs
[8] Directive 1999/74/EC laying down minimum standards for the protection of laying hens
[9] Directive 2007/43/EC laying down minimum rules for the protection of chickens kept for meat production
[10] Directive 2008/119/EC laying down minimum standards for the protection of calves
[11] https://food.ec.europa.eu/animals/animal-welfare/main-achievements_en

management requirements (SMRs), including compliance with existing EU legislation on animal welfare as a condition for receiving basic payments. With the 2007–2013 CAP programming period, the CAP budget was split into two new funds: the European Agricultural Guarantee Fund (EAGF) and the European Agricultural Fund for Rural Development (EAFRD). The EAFRD offered specific payments to farmers for improving animal welfare beyond baseline requirements. The 2014–2020 CAP reform marked a shift toward a more integrated and strategic approach. Animal welfare was supported through rural development measures that rewarded farmers adopting higher welfare standards than legally required. These payments aimed to cover extra costs, income loss, and even some transaction costs. Animal welfare was also indirectly supported under agri-environment-climate schemes, particularly in relation to preserving local breeds at risk of extinction (Zarba et al, 2023).

With the most recent CAP reform for the 2023–2027 period, **animal welfare gained increased prominence through its inclusion under Specific Objective 9**[12]. Two innovations that were introduced by the current legislative framework open the door for enhancing the CAP's delivery for animal welfare: first, it establishes a 'new delivery model', governing how the process of agreeing expenditure on different agricultural policies by individual MS over the period works. This gives the MS increased flexibility on the measures they use relative to the system in the past, within national CAP budgets that are pre-determined for each MS in a prior negotiation over the allocation of the overall EU budget. For the first time, MS are obliged to develop national CAP Strategic Plans (CSPs) for the period. Second, eco-schemes are new for the current CAP and provide payments to farmers for adopting practices linked to either the CAP's environmental objectives and/or to animal welfare objectives involving agreement by the farmers receiving the payments to meet requirements beyond the compulsory minimum. With some exceptions, Member States must dedicate at least 25% of their direct payments budget to them. This means that, for the first time, animal welfare improvements can be incentivised through a share of the EAGF budget.

Report purpose and structure

This report presents an **assessment of how animal welfare is addressed within the Common Agricultural Policy Strategic Plans (CSPs) of EU MS**, with a view to

[12] *"to improve the response of Union agriculture to societal demands on food and health, including high-quality, safe and nutritious food produced in a sustainable way, to reduce food waste, as well as to improve animal welfare and to combat antimicrobial resistance"*, Article 6(i), Regulation (EU) 2021/2115 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans).

identifying opportunities for improvement and alignment with evolving EU animal welfare legislation and scientific recommendations.

In support of these aims, the analysis set out to:

- Identify the animal welfare-related measures included in the national CSPs for the current CAP period.
- Assess which of these measures contribute meaningfully to improving animal welfare, and to what extent.
- Quantify the financial resources allocated to each animal welfare measure per Member State, as well as the overall spending on measures that demonstrably enhance animal welfare.
- Explore how Member States can qualitatively enhance the design and implementation of animal welfare measures in light of the upcoming revision of EU animal welfare legislation and the latest scientific advice.

By addressing these objectives, the assessment seeks to inform policy development and improve the integration of animal welfare considerations in agricultural funding and planning instruments.

The report is structured as follows: **Section 2** outlines the scope and methodology of the assessment, followed by an overview of the animal welfare support schemes established by the national CSPs in **Section 3**. **Section 4** presents a qualitative assessment of the practices supported by the identified CAP schemes. The report concludes with **Section 5,** which includes key conclusions and recommendations for improving the design and implementation of CAP support schemes in the current programming period and beyond.

2. SCOPE AND METHODOLOGY

This study assesses which types of support schemes are used by Member States **to address animal welfare** in the CSPs of EU Member States, with the aim of identifying areas for improvement and greater alignment with evolving **EU animal welfare legislation and scientific best practices**.

2.1 Study scope

A key feature of the current CAP is the requirement for each Member State to develop a **CAP Strategic Plan (CSP)**. These plans outline how Member States intend to meet CAP objectives as well as other relevant EU policy targets, particularly those related to climate, environment, and biodiversity.

CAP funding is delivered through **two main EU funds**:

- The **European Agricultural Guarantee Fund (EAGF)** finances **direct payments** to farmers and **market support measures,** previously referred to as Pillar I of the CAP. The direct payment measures adopted by Member States in their CSPs are 100% funded by the EAGF, which means that there is no MS co-financing.

- The **European Agricultural Fund for Rural Development (EAFRD)**, which supports **rural development.** Previously referred to as Pillar II measures, measures, including environmental schemes and support for disadvantaged areas. Unlike the EAGF, the measures funded by the EAFRD are generally multi-annual and (for the most part) co-financed by Member States, at variable rates.

An overview of the most widely used types of payment schemes supported by the EAGF and the EAFRD is annexed to this report.

This study focused on the following categories of CAP support schemes:

- **Eco-schemes**: Voluntary, typically annual, schemes financed by the EAGF that reward farmers who adopt practices that benefit the environment or help address climate change or raise farm animal welfare standards above the legal minimum.

- **Environment, climate and animal welfare schemes (including aid for organic farms) (ENVCLIM):** Multiannual schemes financed by EAFRD and co-financed by the MS offering payments for farmers who voluntarily adopt or maintain practices that help with climate change, protect natural resources,

preserve biodiversity or involve farm animal welfare practices more beneficial than required by legislation.

- **Investment Aid (INVEST):** Investments in farms and ancillary enterprises are funded by the EAFRD through aid schemes, which are co-financed by Member States, and can contribute to all ten specific objectives of the CAP. Investment aid measures support both "productive" and "non-productive" investments on farms. Non-productive investments are those that address needs not directly related to farm output, such as stabilising landslides, restoring hedges, or creating habitats for biodiversity. Productive investments, on the other hand, include buildings, machinery, and on-farm infrastructure, including renewable energy installations. Individual schemes may support multiple CAP-specific objectives, and Member States are not required to estimate the extent to which a scheme contributes to each objective in their CSPs.

The following indicators set out by the **CAP Performance and Evaluation Framework** (see **Box 2**) were used to identify relevant support schemes:

- O.8: Number of livestock units benefitting from eco-schemes
- O.18: Number/share of livestock units benefitting from support for animal welfare, health, or increased biosecurity measures
- R.43: Limiting antimicrobial use
- R.44: Improving animal welfare

Based on these indicators, we identified **136 support schemes in the Catalogue of CAP interventions[13] that contribute to animal welfare or animal health** for the current CAP period[14]. Regarding the current CAP period, it entered into force at the beginning of the year 2023. The present programming period will run until 2027, with a two-year transition period requiring the financial resources to be used by the end of 2029, which is why we will refer to the 2023-2029 period in this report.

[13] The catalogue of CAP interventions is a database implemented by the European Commission DG AGRI and contains the list of schemes adopted by Member States within their CAP strategic plans for the current CAP: https://agridata.ec.europa.eu/extensions/DashboardCapPlan/catalogue_interventions.html?page=ByUnitAmount. It must be noted that the database was consulted in April 2025. Member States may adopt or cancel schemes when amending their CAP strategic plans.

[14] The current CAP entered into force at the beginning of the year 2023. The present programming period will run until 2027, with a two-year transition period requiring the financial resources to be used by the end of 2029, which is why we will refer to the 2023-2029 period in this report.

Box 2. The CAP Performance Monitoring and Evaluation Framework (PMEF)[15]

The PMEF's context, output and result indicators

The PMEF, established for the current CAP period based on the previous Common monitoring and evaluation framework, sets out a **system of output, result and context indicators** to assess the performance of the CAP. All support schemes are linked to at least one, often several, output and results indicators in the MS' CSPs. The following types of indicators were used to identify animal welfare support schemes covered by this study:

Output indicators, typically expressed as the number of hectares, livestock units, beneficiaries or operations covered by a certain support scheme. They are used to monitor the implementation of the CAP by linking the annual expenditure to these respective indicators.

Result indicators are used to measure how CSPs contribute towards specific CAP objectives. The 44 result indicators established under the current PMEF are typically designed as target indicators. For instance, the result indicator related to animal welfare, R.44, allows MS to define the percentage of livestock units which should ultimately be covered by animal welfare support schemes. To this end, MS linked the relevant support schemes to this indicator in their CSP.

The decision to link a scheme to a given indicator is made by individual Member States. Therefore, **the selection of schemes covered by the analysis reflects each Member State's interpretation of what constitutes a contribution to animal welfare**, which varies across countries. As a result, there are a few measures that the Member States did not consider as pursuing animal welfare objectives[16] but that may have a positive effect on it. For instance, while several Member States associated grazing practices with improved animal welfare by linking them to result indicator 44, Finland did not establish such a link.

[15] Common monitoring and evaluation framework – EU Commission, https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cmef_en

[16] Meaning that Member States did not link the measure to the result indicators related to animal welfare.

2.2 Methodology

CSP support schemes often include a variety of different practices. This means that a single scheme can support several actions, sometimes focused on the same objective or several, depending on the design of the scheme. To understand the extent to which CSP schemes might improve animal welfare, we need to evaluate all the practices supported by a scheme and their combined impact on the desired outcomes. Hence, the assessment presented in this report was carried out in two steps: a description and classification of support schemes and an assessment of practices.

Description and classification of support schemes

Having identified the relevant CSP schemes from the Catalogue of CAP support schemes (as described above), we compiled an inventory describing each theme as outlined below. To do this, we relied on a mix of information provided in the descriptions of each measure using the information contained in the catalogue of CAP support schemes, and the scientific literature (*indicated in brackets):*

- The requirements, i.e. specific actions that farmers need to undertake to receive payment (*Catalogue of CAP interventions*).
- Total budget allocated to the support schemes for the period 2023 – 2029, including both the total EU expenditure as well as total public expenditure (EU budget and co-financing by Member States) (*Catalogue of CAP interventions)*.
- The type of farm animal targeted by the scheme (*Catalogue of CAP interventions)*.
- The number of hectares or animals the support scheme aims to cover as per the Member State's output indicators, as the maximum annual planned output[17], for the 2023-2029 period (*Catalogue of CAP interventions)*.
- We classified the support schemes based on the categories of welfare consequences that they aim to address (i.e. environment, nutrition, health and behaviour of the animals), which are based on the methodological guidance developed by the European Food Safety Authority (EFSA) for the development of animal welfare mandates in the context of the Farm to Fork Strategy (*EFSA, 2022a*).

[17] We considered the maximum annual planned hectares or livestock units concerned for the 2023-2029 period as the most relevant data provided by Member States, as the alternative, the total planned output for the 2023-2029 may be subject to double counting.

Assessment of practices

A **qualitative assessment of the practices** supported by the identified CAP support schemes was conducted, alongside an evaluation of their effectiveness. This consisted of an analysis of the most frequent practices supported by Member States in their CAP strategic plans, including grazing, increasing the minimum area available per animal, reducing the stocking density, support schemes related to the health of animals and the provision of enrichment materials, as well as schemes aiming to phase-out cage farming, due to its strong relevance to animal welfare. For this qualitative assessment, we looked at both the minimum requirements laid down in the legislation and the recommendations formulated by EFSA and the scientific literature for each animal category, which are listed in the annex of the report. This constituted the benchmark we used to determine the potential relevance and ambition of the practices. Additionally, we also considered practices which, despite being able to address relevant welfare consequences, would require more significant support from the CAP strategic plans to address these welfare consequences effectively.

To provide deeper insight into how CAP support schemes operate in practice, we selected five examples for closer examination. While not all of these schemes represent best practices, they illustrate common approaches, different types of mechanisms, and varying levels of ambition in addressing animal welfare. Some were chosen for their innovative or well-designed measures, while others were included because they reflect the broader trends or challenges found in national CAP implementation. Full descriptions of these schemes are annexed to this report.

2.3 Study limitations

Several limitations were encountered during the course of the analysis, primarily relating to the availability and clarity of information on specific schemes. Firstly, **the selection of schemes** covered by the analysis **reflects each Member State's interpretation of what constitutes a contribution to animal welfare**, which varies across countries. This means that the selection of the support schemes could potentially show inconsistencies, depending on the diversity of the approach of Member States.

Secondly, for investment measures, Member States typically outline a list of eligible investments in their Strategic Plans, often detailing the percentage of costs that can be supported through this scheme. For these support schemes, **no data were available on their actual uptake**, making it difficult to understand which investments are ultimately implemented by farmers and how these might affect animal welfare. Therefore, the analysis of investment schemes was solely based on their descriptions and eligible types of costs.

Likewise, **the descriptions of some support schemes** in the CSPs **were not sufficiently detailed**, hindering a clear understanding of their practice. For instance, a measure referring to the requirements to "maintain the animal in good conditions" is not precise enough to understand the effect that this measure would have on animal welfare. In other cases, schemes made reference to national schemes, plans or certification systems that were not readily accessible.

Another challenge was the **regional variation in the implementation of certain measures**. In countries such as Spain, Italy and Germany, regions have some autonomy over the design and execution of CAP support schemes, which makes an overall assessment of the measure difficult.

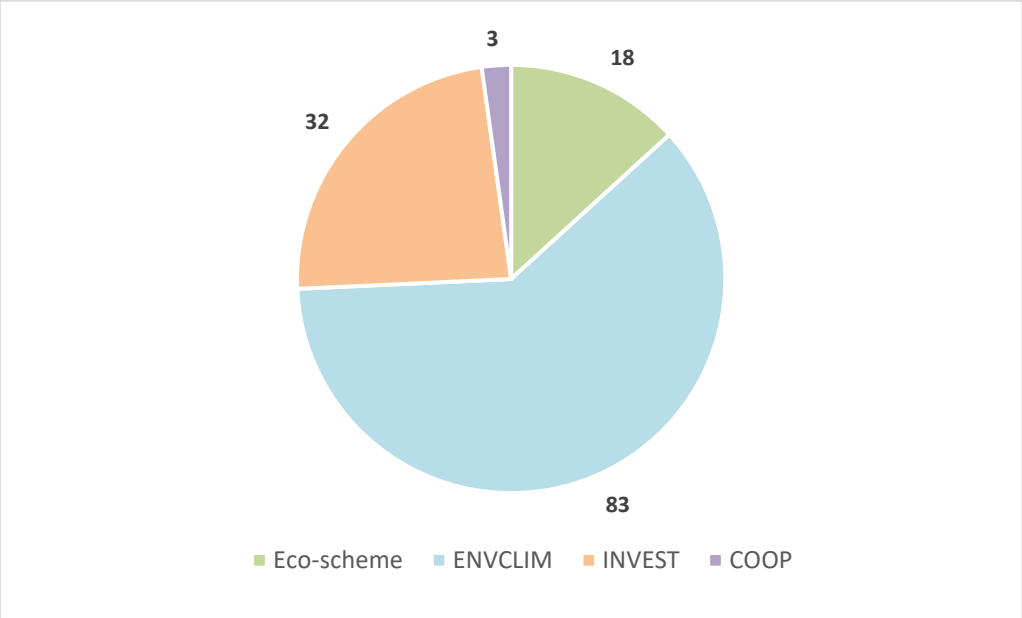
3. DESCRIPTION OF CSP SUPPORT SCHEMES FOR ANIMAL WELFARE AND HEALTH

This section provides an overview of the support schemes related to animal welfare adopted by MS within their CSPs. To understand the types of support schemes adopted, we present information on the range of measures established by the CSPs, including the categories of animal targeted, the farming practices supported, and the specific welfare components addressed. Additionally, for each scheme, MS specify the total public expenditure planned for the 2023-2029 period, offering valuable insight into the budget allocation for animal welfare and farming practices benefiting from this budget.

3.1 Types of support schemes

In the Catalogue of CAP interventions, **136 support schemes are linked to animal welfare or health indicators** (see Section 2.1). This includes 18 eco-schemes, financed through the EAGF, as well as 83 environment and climate measures (ENVCLIM), 32 investment aid schemes (INVEST), and three cooperation measures (COOP), all funded under the EAFRD and co-financed by the respective MS.

Figure 1: Type of support schemes related to animal welfare under the CAP for the 2023-2029 period (n=136)



Source: Catalogue of CAP interventions, European Commission, 2025

The different types of schemes support a range of actions, each contributing to the improvement of animal welfare in different ways. Investment schemes typically support

various investments that have the potential to improve animal welfare. This may include the purchase of new technologies that enhance specific farming practices or herd monitoring, such as milking equipment or automated feeders. Other investments might improve the living environment of animals, like temperature regulation or providing more space per animal, as well as enabling animals to be outdoors through the construction of fences or water ponds. Finally, investment may also improve the health of animals by financing biosecurity measures, including the acquisition of decontamination equipment or the construction of safety corridors.

Eco-schemes and measures for the environment, climate and animal welfare compensate farmers for adopting certain farming practices that improve animal welfare, such as grazing and reduction of the stocking density. These farming practices may be detailed by the Member States, or they may refer to an already-defined scheme, like organic production, which is defined by the EU Organic Regulation[18] or a national scheme.

Animal welfare can also be enhanced by increasing farmers' knowledge of animal welfare. This can result from training that farmers can or must attend, as well as from improved cooperation between farmers.

The form of the support

For some support schemes, farmers must adopt all the farming practices listed in the scheme, while other farmers can "pick and choose". In that case, independent rates can be associated with the different farming practices, or either a "point-based" or a "multiple-choice" system can be adopted (see **Box 3**).

Box 3. Poland's eco-scheme dedicated to animal welfare

Poland's points-based approach to incentivising animal welfare actions

The animal welfare eco-scheme adopted by Poland (see Annex 7.3.1 for a full description) illustrates the diversity of support schemes under the CAP. This scheme covers a range of animal categories and practices, with specific requirements defined for each category. Two sets of obligations can be distinguished: for poultry, horses, sheep and goats, farmers must meet **all the requirements**, while for pigs and cattle, they can choose

[18] Regulation (EU) 2018/848 on organic production and labelling of organic products and repealing Council Regulation

from **a points-based 'menu' of actions**. The latter operates as a points-based system where each eligible practice is assigned a specific number of points. In order to qualify for the payments, farmers must accumulate a minimum number of points with the threshold based on the size of the farm. For instance, a farm of 10ha will require fewer points than a farm of 100ha. Once the threshold is met, each point is valued at 100 Polish Zloty (PLN), meaning that a farm accumulating 150 points would receive 15,000 PLN per year. Within the points-based system, farmers must meet a mandatory requirement to increase the space per animal in accordance with the conditions set out in the CSP. Beyond this, they can choose from a list of practices, for example enhanced bedding provision, and later weaning for calves, to reach the necessary points threshold. In addition, farmers implementing this eco-scheme are required to attend a one-time training session on methods to reduce the use of antibiotics. They must also adopt an animal welfare improvement plan except for dairy cow operations.

Member States have the capacity to determine **financial rates for each scheme. Typically, these rates are based on the number of livestock units[19] or hectares** involved in the scheme on an annual basis. In this regard, the rates appear to be particularly heterogeneous, which results from the flexibility of which Member States benefit, as they may take into account a wide variety of factors.

Payments aim to compensate for the potential income foregone and the additional costs associated with the uptake of animal welfare-friendly practices. In this regard, Slovenia adopted one scheme, for which the description of the rates refers specifically to the compensation of the costs generated by the adoption of the supported practices, compared to the costs associated with "normal breeding practice". More precisely, this scheme mentions that "the support shall be the difference in the financial result between normal breeding practice and the implementation of animal welfare scheme requirements". In this regard, the adoption of rates should ensure that farmers

[19] Livestock unit, a reference unit which facilitates the aggregation of livestock from various species and age as per convention, via the use of specific coefficients established initially on the basis of the nutritional or feed requirement of each type of animal. The reference unit used for the calculation of livestock units (=1 LSU) is the grazing equivalent of one adult dairy cow producing 3 000 kg of milk annually, without additional concentrated foodstuffs. LSU is only calculated for bovine animals, goats, sheep, equidae, pigs, poultry, and female breeding rabbits.

benefit from a certain flexibility to implement the support practices, as it can encourage the uptake of ambitious practices for animal welfare.

Overall, the form and levels of payments are a question that should be carefully assessed by Member States to ensure the effectiveness of the measure on animal welfare. A holistic reflection should indeed be conducted by Member States, taking into consideration which welfare consequences should be addressed through multiannual payments, and which should be addressed through investment. For instance, biosecurity measures are often supported through investment schemes (e.g. purchase of cleaning equipment), while requiring the provision of a minimum number of grazing per year would logically be supported through a multiannual payment, as it requires a multiannual commitment from farmers. Moreover, Member States should also ensure that there is no double-funding, in the sense that a CAP support scheme should not already be financed by either another CAP instrument or another source of funding outside of the CAP.

"Direct" vs "indirect" contribution of schemes to animal welfare

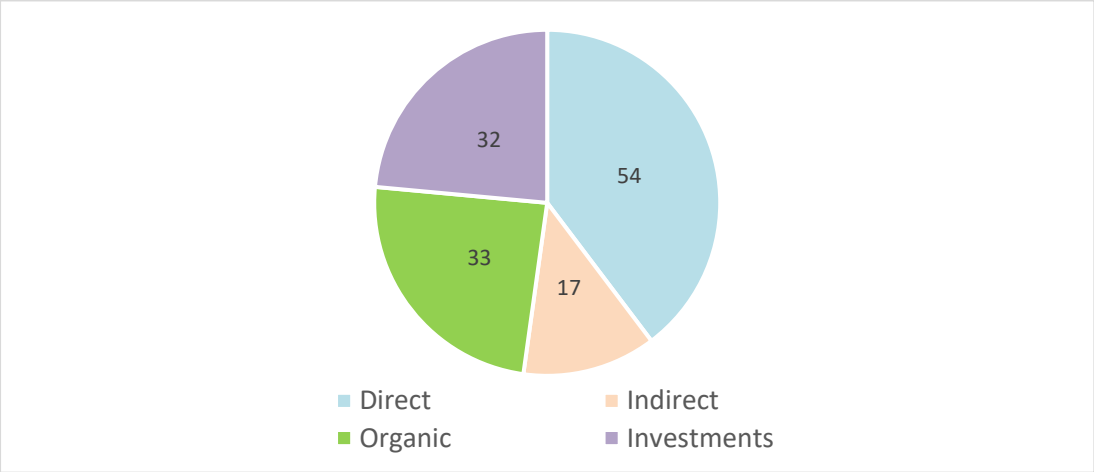
Support schemes can also be categorised as contributing "directly" or "indirectly" to animal welfare. Schemes with a direct effect refer to scheme supporting practices which would contribute to the improvement of animal welfare, whether it concerns their environment, their health, their behaviour or their nutrition. On the other hand, schemes with an indirect effect may include schemes aiming at reducing antimicrobial resistance or maintaining permanent grassland, which may allow better grazing opportunities in the long term. **Figure 2** below highlights the number of schemes that contribute to animal welfare directly and indirectly.

Schemes supporting investment and organic farming were not included in this classification. It is difficult to evaluate the extent to which investment schemes contribute directly or indirectly to animal welfare, as some of them might only have a distant effect on animal welfare, while those related to temperature management or the enrichment of the environment may contribute directly to the welfare of animals. Likewise, organic schemes may contribute to animal welfare when directed towards livestock farming, but most of the time, they also support other types of production[20]. Therefore, despite contributing significantly to animal welfare when directed towards livestock, there is no certainty that they contribute directly to animal welfare.

[20] Bulgaria and Estonia are the only Member States that adopted AW schemes to support organic farming exclusively for livestock farmers.

As a result, the figure below excludes schemes supporting investments and organic farming from the classification between "direct" and "indirect" contribution of the schemes to animal welfare.

Figure 2: Level of contribution of CAP support schemes to animal welfare (n =136)



We can observe in the figure above that most of the support schemes linked to animal welfare in the CSPs contribute to animal welfare directly, especially compared to support schemes with an indirect contribution. We also notice that organic and investment schemes represent an important share of the total number of schemes.

The remainder of this chapter focuses on the eco-schemes, measures for the environment, climate and animal welfare, and investment aid.

3.2 Animals and animal welfare components targeted

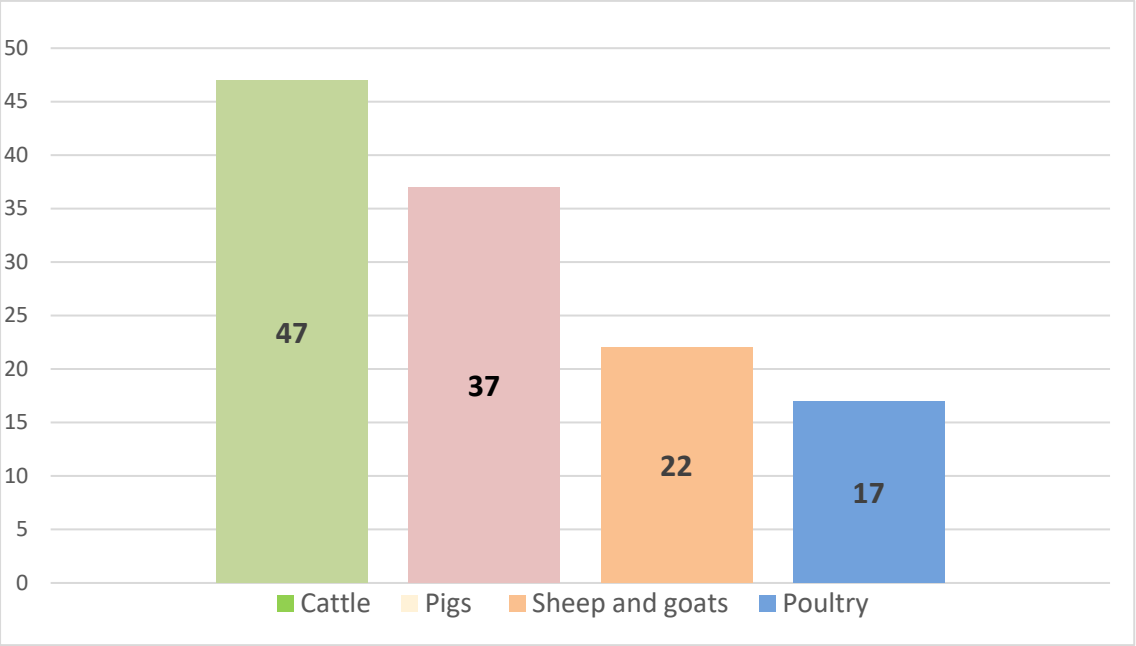
The assessed support schemes cover a range of categories of farmed animals, including poultry, pigs, cattle, sheep, goats and, in some countries, horses. While the descriptions of some support schemes do not specify to which animal they apply[21], many explicitly refer to one or multiple animal categories. As a matter of fact, 62 support schemes do not specify expressively which animal categories are concerned by the scheme, 47 support schemes only target one animal category, while 27 schemes support at least two animal categories.

Figure 3 displays the schemes targeting only one animal category and the scheme targeting multiple animal categories, which represent a total of 74 support schemes.

[21] This is the case for all investment and organic farming support schemes, and four other types of schemes.

Cattle are most frequently covered by animal welfare support schemes, followed by pigs, sheep and goats, and poultry.

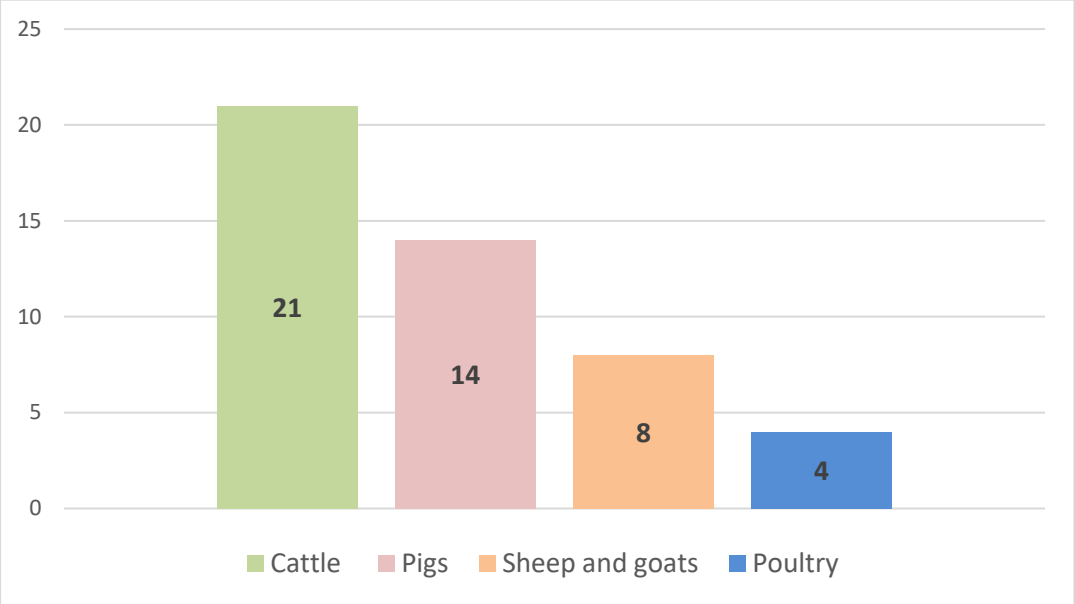
Figure 3: Number of CAP support schemes per animal category for the 2023-2029 period (n =74)



Source: Catalogue of CAP interventions, European Commission, 2025

As explained above, support schemes may cover more than one category of animal, meaning a single scheme may appear in more than one column in Figure 3. In these cases, it is unclear what share of the budget will ultimately benefit different animal categories. Figure 4 shows the number of support measures applying to only one category, which confirms the tendency observed in the first figure, namely that cattle is the animal category covered by the majority of schemes. In contrast, only four schemes are exclusively linked to poultry.

Figure 4: Number of CAP support scheme only related to one animal category for the 2023-2029 period (n= 47)



Source: Catalogue of CAP interventions, European Commission, 2025

According to a recent report (DG AGRI, 2023), 24% of livestock units at the EU level are expected to be covered by schemes related to animal welfare during the 2023-2029 period. However, this figure includes all support measures linked to result indicator R.44 in the national CSPs, such as organic farming and investment aid, which serve multiple objectives rather than exclusively targeting animal welfare. There is a disparity between MS, as for instance Finland targets 93.3% of their livestock units through the support schemes linked to animal welfare through R.44, while Portugal, Ireland, Spain, Belgium (Flanders) and the Netherlands all target less than 7% of their livestock units for the same period[22]. So did Denmark, which did not adopt any scheme related to animal welfare.

Additionally, we divided the support schemes related to animal welfare based on the welfare consequences that they aim to address. For this, we identified four main categories, based on the 33 welfare consequences identified by EFSA (2022a): Environment, nutrition, health and behaviour.

- Many schemes aim to improve the **living environment,** for instance, by providing grazing opportunities to animals, upgrading the flooring of the holding, and increasing the space available per animal.

[22] Result indicators dashboard – European Commission, consulted in April 2025, https://agridata.ec.europa.eu/extensions/DashboardCapPlan/result_indicators.html

- Likewise, several schemes incentivise practices related to the **nutrition of animals** by ensuring safe access to food and providing adequate and high-quality feed (e.g. use of colostrum for calves, testing the quality of water).

- **Animal health** is addressed through schemes which support the adoption of biosafety measures (e.g. disinfection, quarantine of new animals), or the use of vaccines, which may be implemented through a plan at the farm level.

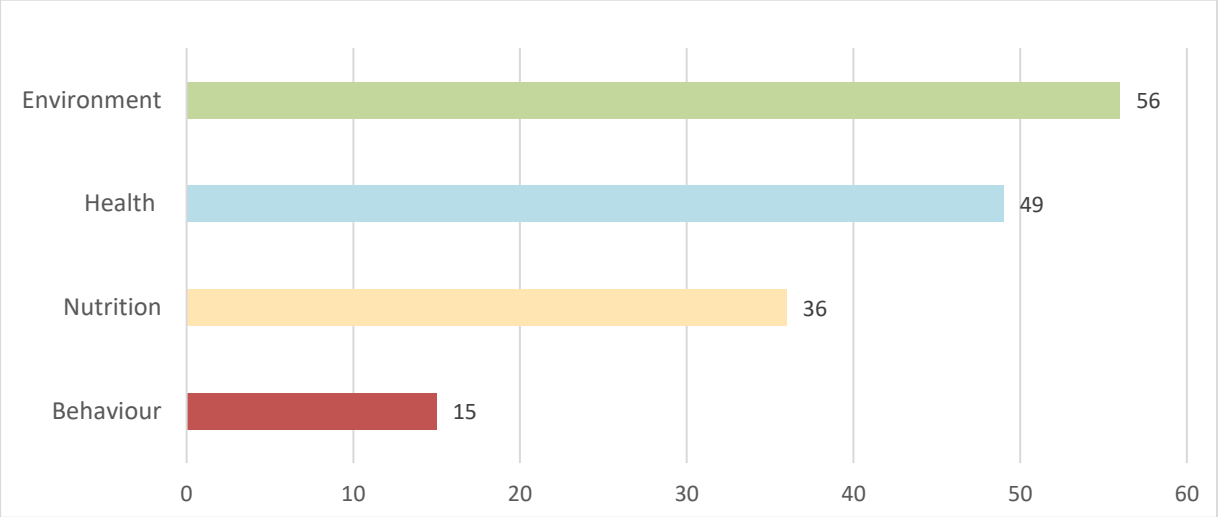
- Schemes aiming to encourage the expression of **natural behaviour** of animals incentivise the provision of enrichment material, such as hay and straw for pigs or perches for poultry. These changes may encourage natural behaviour in animals, including exploratory and playful behaviours, which significantly improve the mental state of animals.

Schemes can serve one or multiple of these welfare components, depending on the types of practices that are supported.

Figure 5 displays the number of CAP support schemes related to welfare components. It must be noted that for many support schemes, particularly investment schemes, the welfare components targeted can't be identified with certainty. Moreover, considering that organic schemes have the potential to address all the welfare components, integrating them in the figure below would reduce its clarity, which is why they were not integrated into the figure. As a result, the figure concerns 80 support schemes, for which it was possible to identify the welfare components targeted.

Figure 5 shows that improving the living environment is the most frequently targeted welfare component. In contrast, considerably fewer CAP schemes support practices that promote natural behaviour in animals. As noted above, most schemes target multiple welfare components, making it difficult to estimate to what extent they contribute to each of the targeted components.

Figure 5: Number of CAP support schemes per welfare component for the 2023-2029 period (n=80)



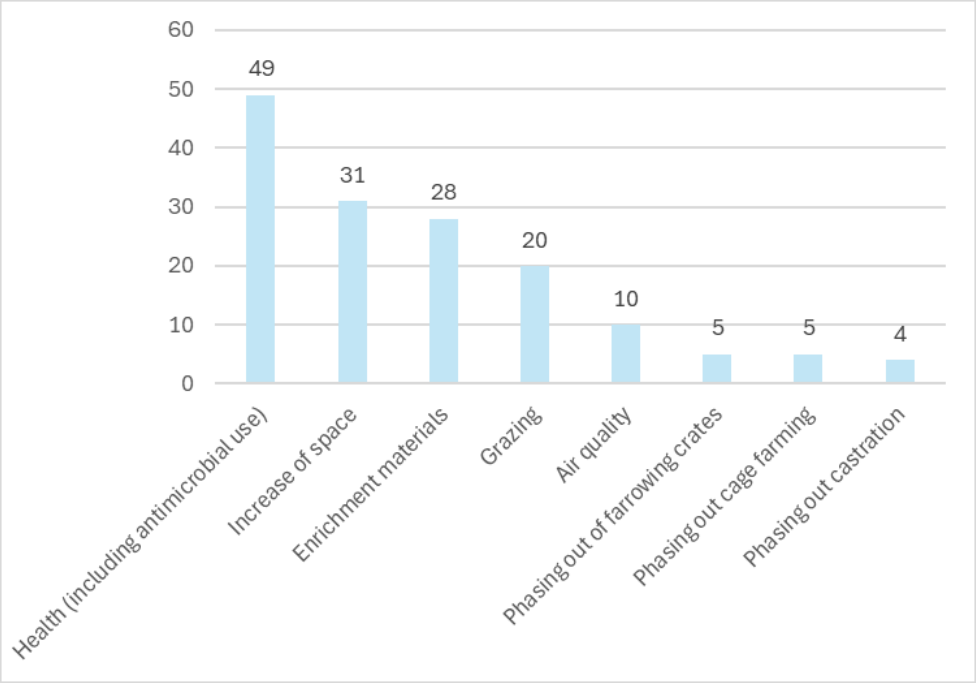
Source: Catalogue of CAP interventions, European Commission, 2025

3.3 Type of practices supported

Figure 6 shows that **four types of practices are most frequently supported by the CAP schemes covered in this study**. Forty-nine schemes incentivise practices aimed at enhancing animal health; this high number may reflect the broad set of practices that contribute to health (e.g. biosecurity measures, health plans on farm). Thirty-one schemes support actions to increase the minimum space available per animal or reduce stocking density[23]. Twenty-eight schemes relate to the provision of enrichment materials, such as straw and hay, as well as bedding and littering associated with the provision of such materials, and 20 support grazing practices.

[23] Eight of the 31 schemes listed concern expressively the reduction of stocking density, which concern mostly poultry farming (see section 4.3.2).

Figure 6: Type of practices supported through CAP support schemes for the 2023-2029 period (n=81)



Source: Catalogue of CAP interventions, European Commission, 2025

It should be clarified here that the schemes supporting organic farming are, again, not included in this table. While such schemes are likely to support some of the practices mentioned (e.g. grazing, stocking density), the extent to which such schemes are directed to livestock farming remains uncertain. Likewise, many investment schemes are not related to specific farming practices, which is why most of them are not included in the figure above, except certain investment schemes related to biosecurity, anti-microbial use and increase of space. As a result, 81 support schemes have been taken into account within Figure 6. Additionally, many of the CAP schemes support multiple farming practices, meaning that some practices listed in the figure above may be incentivised through the same measure.

Finally, other practices not referenced in the figure[24] are supported by CAP support schemes, such as the reduction or prohibition of tethering and tail docking practices. All these practices will be analysed in more detail in Section 4.

3.4 Budget allocated to support schemes

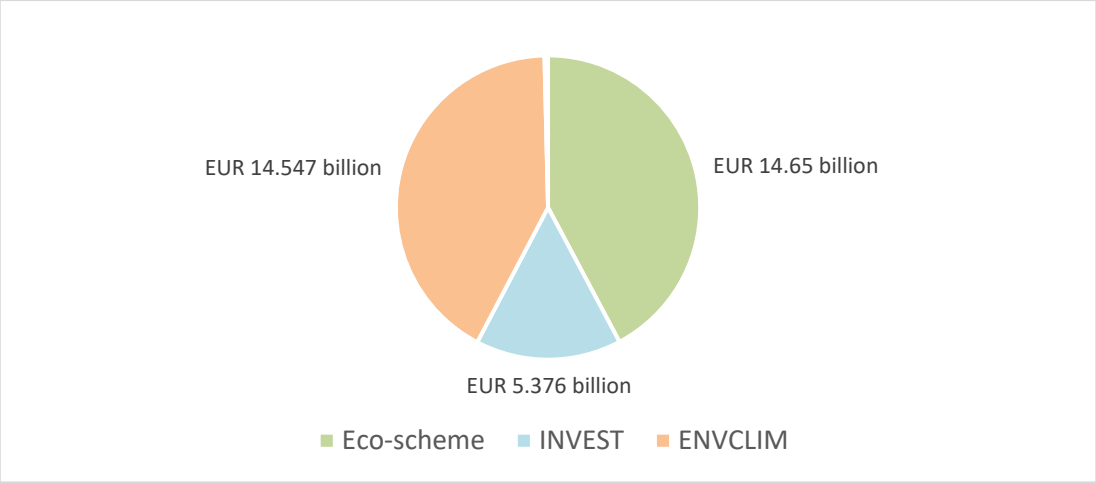
The seven-year budget dedicated to the CAP under the current Multiannual Financial Framework is EUR 386.6 billion, with EUR 291.1 billion for the EAGF (75.2%) and EUR

[24] Several practices were not included in the figure due to the low number of schemes supporting them.

95.5 billion for the EAFRD (24.8%)[25]. **The total budget allocated to schemes linked to animal welfare and health indicators, through R.44 and R.43 in the national CSPs for the period 2023-2029, comes to around EUR 35 billion**[26]. Most of the budget comes from EU funding (EUR 27 billion), while the rest is co-financed by Member States (EUR 8 billion)[27].

Regarding the financial distribution by type of scheme, the majority of the budget allocated to animal welfare schemes in the CAP for the 2023-2029 period is reserved for eco-schemes and environment and climate measures; more than EUR 14.5 billion is allocated to each (see Figure 1). With EUR 5.3 billion, investment aid receives a considerably smaller share, while only EUR 130 million is allocated to cooperation measures[28].

Figure 7: Financial allocation to animal welfare by type of support scheme for the 2023-2029 period (n=133)



Source: Catalogue of CAP interventions, European Commission, 2025

The share of the budget contributing to animal welfare objectives

It would be inaccurate to state that EUR 35 billion are contributing directly to animal welfare. As noted earlier, many of the support schemes identified in the CSPs

[25] European Commission website – Common Agricultural Policy Funds, https://agriculture.ec.europa.eu/common-agricultural-policy/financing-cap/cap-funds_en

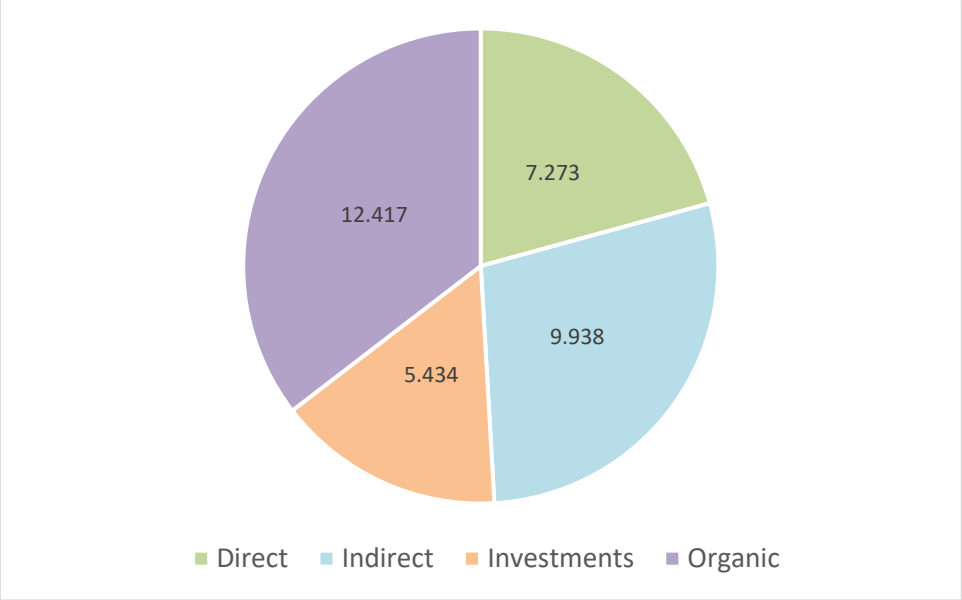
[26] *Catalogue of CAP interventions, European Commission, 2025, https://agridata.ec.europa.eu/extensions/DashboardCapPlan/catalogue_interventions.html?page=ByUnitAmount*

[27] *Idem*

[28] Considering the low number of cooperation schemes, they have not been included in Figure 7

as contributing to animal welfare serve multiple objectives. This is particularly the case for investment measures: of the 32 investment schemes that the MS link to animal welfare, only nine exclusively target animal welfare, 19 identify animal welfare as one objective among several and four do not explicitly mention animal welfare as an objective. It is therefore reasonable to assume that not all actions supported by these schemes, and thus the budget, will contribute to animal welfare. **Figure 8** shows the CSPs budget allocations broken down by expected level of contribution, distinguishing between schemes serving multiple objectives (investment aid and schemes supporting organic farming) and those exclusively targeting animal welfare, whether through direct and indirect impacts (see Section 3.1).

Figure 8: Share of the total public expenditure for the 2023-2029 period per scheme, depending on their level of contribution (in EUR billion) (n=136)



This breakdown shows that despite accounting for a smaller number of schemes, measures with an indirect effect on animal welfare receive a higher share of the budget than those with a direct effect. However, an important caveat is that, out of the EUR 9.938 billion allocated to indirect schemes, France's only eco-scheme accounts for EUR 8.53 billion, which alone represents more than the total public expenditure dedicated to direct schemes for the 2023-2029 period. To undertake this eco-scheme, farmers can, on a voluntary basis, adopt one of the three options offered by the scheme: obtaining one of the eligible certifications or labels (e.g. Organic, High Nature Value (HNV) farming, adopting practices protecting biodiversity (e.g. agroecology, fallow-land), or adopting good management practices related to soil. Considering that the effect of these three options on animal welfare remains uncertain, the money

allocated to this eco-scheme may not contribute meaningfully to an improvement of animal welfare.

Another point to note is the considerably high share of the total public expenditure on the support schemes related to animal welfare that is allocated to organic farming. As explained before, organic support schemes are not exclusively targeted at livestock or mixed farms (see **Box 3**), which makes their contribution to animal welfare also uncertain, despite being potentially very relevant. Overall, the requirements associated with organic farming are considered to contribute to an improvement in the welfare of animals.

Box 4. The EU organic regulation

Organic production and animal welfare standards

The Regulation for Organic Production and Labelling of Organic Products ('Organic Regulation')[29] lays down several requirements for farmed animal production. Some of these requirements concern the nutrition of animals, which must be fed with organic feed or feeds explicitly authorised for organic production. Likewise, farmed animals shall not be fed in a way that encourages anaemia, force-feeding is forbidden, and fattening practices need to respect the normal nutritional patterns of each species. Additionally, all farmed animals, except pigs and poultry, must have permanent access to pasture, whenever conditions allow, or have permanent access to roughage. Other requirements focus on the health of animals, such as the obligation to clean and disinfect housing, pens and equipment.

The organic regulation also lays down requirements related to housing and husbandry practices. In this regard, the Commission Implementing Regulation 2020/464[30] lays down stocking density limits and the minimum space for farmed animals. For instance, according to this regulation, the rearing of broiler chickens shall respect a maximum of 21kg/$m^{2,}$ while the minimum space for a dairy cow raised indoors shall be

[29] Regulation (EU) 2018/848 on organic production and labelling of organic products and repealing Council Regulation

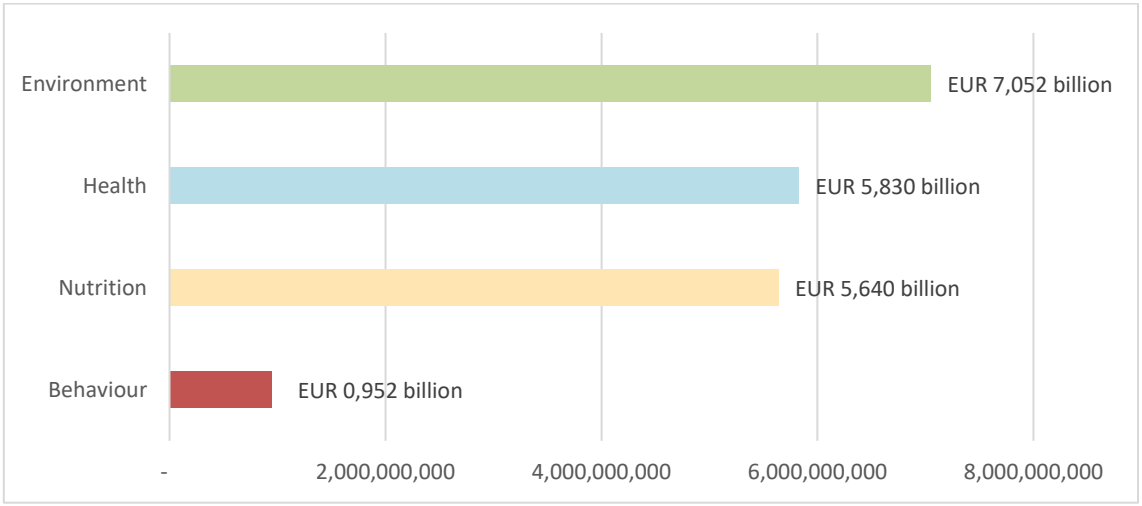
[30] Commission Implementing Regulation (EU) 2020/464 laying down certain rules for the application of Regulation (EU) 2018/848 of the European Parliament and of the Council as regards the documents needed for the retroactive recognition of periods for the purpose of conversion, the production of organic products and information to be provided by Member States

at least 6m^2 and 1.5m^2 for pigs raised indoors and 2.5m^2 when raised outdoors. Moreover, organic farmers must comply with additional requirements that are specific to the types of animals they are raising.

The budget allocated to the different components of animal welfare

The measures adopted by Member States aim to address various aspects of animal welfare. As explained in Section 3, we identified four key categories that influence animal welfare: environment, health, behaviour, and nutrition. Since this information was not explicitly provided in the measure descriptions, our assessment of each measure's contribution to these categories is based on our own expert judgement. **Figure 9** shows the financial allocation broken down by animal welfare components targeted by the assessed support schemes. As for **Figure 5**, several support schemes, notably cooperation and organic schemes, as well as part of the investment schemes, could not be linked to a specific welfare component, which is why they were not taken into consideration in the figure below. Moreover, it is difficult to isolate the specific contribution of a measure to a single outcome. As a result, the boundaries between these objectives can occasionally be ambiguous. For instance, a measure promoting grazing practices affects both the living environment and the nutrition of animals.

Figure 9: Total financial allocation to measures pursuing the following objectives linked to animal welfare for the 2023-2029 period (excluding organic farming and investment schemes) (n=80)



Source: Catalogue of CAP interventions, European Commission, 2025

Figure 9 shows that support schemes targeting the living environment of farmed animals (e.g. provision of outdoor access, increased space allowance, improvement of floor conditions) take up the largest share of the budget, followed by those contributing to nutrition and health improvements. In contrast, schemes aiming to aid the natural behaviour of animals (e.g. provision of enrichment materials) receive only a small proportion of the total budget allocated to animal welfare and health.

4. ASSESSMENT OF THE PRACTICES RELATED TO ANIMAL WELFARE SUPPORTED BY THE CSPs

This section provides a qualitative analysis of the **most frequently supported practices by the national CSPs support schemes for animal welfare, namely grazing, increasing the minimum space per animal, reducing the stocking density**, support schemes related to animal health and the provision of enrichment materials, as well as schemes aiming to phase-out cage farming, due to its strong relevance to animal welfare. In addition, the section identifies animal welfare aspects that are not sufficiently tackled by the practices supported through the CSP schemes for the current CAP programming period.

4.1 Grazing

18 Member States incentivise the implementation of grazing practices through 20 of the assessed schemes, i.e. 12 environment and climate measures and eight eco-schemes. The total budget allocated to these schemes is EUR 6 billion for the period 2023-2029, but it must be noted that 13 of these measures, together accounting for EUR 4.6 billion, also support other practices. This means that only EUR 1.4 billion is allocated exclusively to grazing practices for the same period.

Grazing opportunities can significantly improve the welfare of animals by enabling them to express natural behaviours and to be raised in a low-density environment, encouraging natural movement and social interaction (Pe'er et al, 2023). Additionally, grazing activities may also contribute to the reduction of lameness and mastitis for dairy cows (EFSA, 2023c).

Most of the schemes related to grazing require farmers to ensure access to grazing for animals during the grazing period[31] for a minimum number of days, which may vary depending on the length of the grazing season but typically ranges between 100 and 160 calendar days. Of the 20 support schemes for grazing, 12 require farmers to provide grazing opportunities for a minimum of days per year, of which 11 can be considered satisfactory, as they all require a minimum period of grazing of three months per year or more. As a matter of fact, EFSA considers that providing access to pasture for animals for less than 60 days per year is not satisfactory (EFSA, 2023c). Other schemes require farmers to implement actions which are assessed as only indirectly beneficial to grazing practices. These include notably the undertaking of national certifications, as well as the design of grazing plans by farmers, in which

[31] The grazing period is not the same in every Member State, as it depends on climatic conditions, but most of the time starts between March and May and ends between late September and November.

farmers may detail the grazing conditions they provide for animals (e.g. number of days, facilities where grazing takes place).

In addition, there are four investment schemes which support investments related to the implementation of grazing practices. These measures are not included in the schemes described above since other types of investment are also eligible for financial aid under these schemes, which makes it uncertain to what extent these schemes will support grazing practices. Grazing practices are also part of the requirements associated with organic livestock production. However, support for organic farming is also not included in the count above.

Grazing practices are among the most frequently incentivised actions in the schemes covered by this analysis. This may be due to several factors. Firstly, grazing provides benefits beyond animal welfare, notably regarding the preservation of soil on permanent grassland. Additionally, for farmers disposing of grazing facilities, implementing grazing practices may not mean incurring important additional costs. Furthermore, grazing is a farming practice that is relatively common in some parts of Europe. For instance, in France, 87% of dairy cows had access to grazing for more than 170 days per year in 2010 (Observatoire des élevages laitiers, 2018), and in Belgium, where it has been estimated that 95% of dairy cows had access to grazing in 2015 (Life Dairyclim Project, 2017). Some Member States, where access to grazing is lower, for instance, in the Netherlands, where the figure was at 70% for dairy cows in 2013 (Van den Pol-Van Dasselaar, 2016), adopted an objective of ensuring that 80% of dairy cows had access to grazing by 2020 (Huyghe, 2019).

Overall, the contribution of CAP support schemes to grazing, whether they support it directly or through organic farming, can be considered beneficial for animal welfare. The fact that most schemes require a minimum of 90 days with access to pasture is positive. However, a question remains concerning the "conversion" effect of the schemes. Given that grazing is already a common practice in some Member States, it is possible that many farmers who are benefiting from the respective CAP payments were already providing access to grazing land, either prior to its implementation or independently of it.

4.2 Increasing space available for animals or reducing stocking density

Increasing the area available per animal or reducing the stocking density is an important objective of several CAP support schemes. Although the terminology may differ, both the reduction of stocking density and the increase in area available per animal serve similar objectives and are interchangeable. The preference for one term over the other often depends on the specific animal category; for instance, in poultry farming, the term "stocking density" is commonly used, whereas in other sectors, such

as pig and cattle production, it is more typical to refer to the area per animal or the lying space for animals.

The stocking density and the area available per animal are very important components of animal welfare, as a lack of space for animals may lead to severe welfare consequences. Depending on the species, high stocking densities can lead to injurious behaviours, high levels of stress, locomotion problems, degraded litter or bedding quality, and worse health outcomes (Hall et al, 2001; Turner et al, 2012). High stocking densities are also a risk factor for the rapid spread of diseases (EFSA, 2023c, Stevenson, 2023).

Measures based on increasing the minimum area available for animals

There are 31 support schemes in the national CSPs incentivising actions to increase the space available per animal, which have been adopted by 19 Member States and represent 25 schemes related to environment and climate, three eco-schemes and three investment schemes. However, despite being critical for animals, **the CAP schemes aiming to increase the space per animal appear to lack ambition**. Most of the requirements ask for an **increase compared to the basic legislation, typically between 10 and 20%** (see **Box 5**). These minimal increases over legal baselines may fall short of delivering meaningful change

Box 5. Cyprus' agri-environment and climate scheme to improve the welfare of cattle, pigs, sheep and goats

Cyprus' approach to increasing space available per animal

Cyprus agri-environment and climate scheme for animal welfare (see a full description of the scheme in Annex 7.3.1) sets out specific requirements for increasing the space available per animal, defined as a percentage increase over the legal minimum For instance, for pigs housed in enclosures, the space available per animal should be 15% larger than the legal minimum to improve comfort and mobility. Similarly, for dairy cows, the scheme mandates that the available space per animal must increase by 5%, each year which is to be achieved by gradually reducing the number of cows. However, this requirement applies only for two years and represents a relatively modest adjustment, potentially limiting its long-term welfare impact.

The EU legislative requirements on space allowances are outdated[32] compared to what is considered "satisfactory" according to the EFSA recommendations[33]. Arguably, therefore, increasing the minimum area available per animal by 10% still does not represent a significant improvement in animal welfare. For instance, a 10% increase in space compared to legal requirements for pigs above 110kg means an additional 0.1m^2 per animal, which is unlikely to produce significant welfare effects. The low requirements set by the legislation currently seem to act as a barrier to adopting more ambitious practices since they would require significant changes for farmers, potentially involving substantial financial costs.

Finally, it should be noted that the EU's Organic Regulation also sets requirements related to the space per animal (see **Box 4**). Therefore, the support schemes dedicated to the transition towards organic farming, when related to livestock production, are likely to contribute to an increase of the minimum space available per animal.

Measures based on reducing stocking density

Of the 31 schemes aiming to increase the space per animal, 11 incentivise actions to reduce the stocking density (two investment schemes and nine schemes related environment and climate), mostly for the poultry sector[34]. Reducing stocking density in poultry farming is often easier to implement compared to increasing space per animal in cattle or pig farming due to the smaller size of poultry and the scalability of their housing systems, therefore not requiring important structural changes to facilities (Utnik-Banas et al, 2014).

In its latest recommendations, EFSA (2023a) considers that a stocking density of more than 11kg/m^2 is likely to affect the health of broilers, as well as impair behavioural needs realisation. Concerning the stocking density of laying hens, EFSA (2023b) establishes that four birds/m^2 is the maximum stocking that does not lead to plumage damage, a relevant indicator for the welfare of laying hens (Pichová et al, 2016). **The analysis of CAP support schemes shows that none currently require farmers to comply with, or incentivise them to move towards, the stocking densities recommended by the EFSA.** For instance, environmental and climate schemes in

[32] Here, the legislation refers to the EU directive laying down minimum standards for the protection of animals kept for farming purposes and the EU directive related to calves, laying hens, broiler chickens and pigs (see Table 3 in the Annex)

[33] These recommendations refer to the EFSA Panel on Animal Health and Welfare listed in Table 3, namely the one related to laying hens, broiler chicken, pigs, calves and dairy cows.

[34] Among the 11 measures referring to stocking density, eight concern the poultry sector, one concerns cattle and two do not refer to a specific sector.

Croatia and Slovakia set a maximum stocking density of 30 kg/m^2 for broiler chickens, considerably higher than the values recommended by EFSA.

Many farms still have a stocking density relying on the derogation laid down in Annex II of the Directive for the welfare of broiler chickens[35], which allows farmers, under certain circumstances, to use a stocking density of more than 33kg/m^2. Therefore, even schemes that are not aligned with EFSA recommendations can offer improvements compared with the status quo.

However, the practices adopted to reduce the stocking density may not always be optimal for the welfare of broiler chickens. For instance, Malta adopted a scheme for the environment and climate, aiming to reduce the stocking density for broiler chickens below 28kg/m^2. Specifically, the scheme recommends bringing forward the slaughter date by one week (from 42 to 35 days), on the grounds that this reduces unnecessary suffering, as after 35 days, the density stress is at its peak, as evidenced by a deterioration in feathering[36]. Such practice, if it reduces unnecessary suffering, does not appear as an optimal practice for the welfare of broilers, as it still implies the use of breeds with a fast growth rate (European Commission, 2016), which can lead to many welfare consequences (Riber, 2024).

As above, it must be highlighted that actions to reduce stocking density may also be incentivised through schemes supporting organic farming. Notably, the EU Organic Regulation[37] establishes a maximum stocking density of 21kg/m^2 for broiler chickens, which is more ambitious than most of the CAP schemes assessed in this study but does not meet the most recent EFSA recommendations, which recommend a stocking density of 11kg/m^2 (EFSA, 2023a).

4.3 Animal health and antimicrobial use

Several support schemes designed to enhance animal welfare also have the potential to positively impact animal health. This is largely due to the fact that these schemes address welfare-related issues that can adversely affect health (e.g. overcrowded holdings and poor ventilation can lead to chronic health issues).

However, **a number of schemes are specifically designed to improve animal health, both through improved treatments and preventative measures**. These target infectious diseases (e.g. African swine fever), chronic health issues (e.g.

[35] Council Directive 2007/43/EC of 28 June 2007 laying down minimum rules for the protection of chickens kept for meat production

[36] Approved CAP strategic plan, Malta, November 2022. https://fondi.eu/programme/common-agricultural-policy-strategic-plan/

[37] Regulation (EU) 2018/848 on organic production and labelling of organic products

respiratory and digestive diseases) or antimicrobial resistance, which is problematic for both animal and human health.

A range of practices is supported through these schemes, with some of them requiring farmers to implement preventive control and assessment of animals (e.g. faeces sample), to carry out specific practices reducing the risk for animals (e.g. additional hoof care), as well as to monitor the condition of animals. Additionally, some of these schemes require farmers to adopt a "health plan" for the farm, which, in some cases, may be designed and implemented with the support of a veterinarian or competent authorities. Such plans may lead to the adoption of a vaccination strategy or the implementation of biosecurity measures, but they may also be linked to management practices.

Overall, for the period 2023-2029, 49 support schemes[38] aim to improve the health of animals, with 22 of them focusing only on health and 29 focusing on health among other objectives[39]. As a result, 18 Member States established support schemes to improve animal health through their CSPs. This might be explained by the fact that health consequences for animals may have important financial consequences and reduce the productivity of the farm (Health for Animals, 2023).

Several schemes specifically target the reduction of antimicrobial use[40]. In these cases, our review suggests a correlation between the type of scheme and the practices supported. Investment schemes typically provide financial support for biosecurity measures. In contrast, schemes related to climate and environment rarely incentivise biosecurity actions but focus on the monitoring of animal health indicators (e.g. assessing the activity/rest time, faeces sampling to monitor the parasitic load, lameness, etc). Some of these schemes also require compliance with specific objectives related to antimicrobial use, for instance, related to the vaccination threshold that must be carried out on-farm or the maximum use of antimicrobials per animal (see **Box 6**).

[38] These 49 support schemes are composed of nine investment schemes, five Eco-schemes, two cooperation schemes and 33 schemes for the environment and climate.

[39] Many Member States also considered that a scheme could be related to animal health or antimicrobial use, despite not having any requirement having health as a primary objective. This can be understandable since an improvement in animal welfare in general can lead to an improvement in animal health. However, such schemes were not included in the number mentioned above.

[40] While Member States linked 90 support schemes to R.43, considering that they would contribute at least indirectly to anti-microbial reduction use, we listed 12 support schemes that refer explicitly to objectives related to anti-microbial use

Box 6. Italy's eco-scheme for antimicrobial resistance reduction and animal welfare

Antimicrobial use reduction through tiered commitments and digital monitoring

The Italian eco-scheme for antimicrobial resistance reduction and animal welfare (see Annex 7.3.3 for a full description) offers two levels of commitment, from which farmers can choose. The first level focuses on reducing antimicrobial use in livestock farming. To support this goal, Italy has implemented an online platform, ClassyFarm, which provides region-specific benchmarks for antimicrobial use in the form of the "Defined Daily Dose" (DDD). To be eligible for payments under this scheme, farmers must either stay below the regional DDD threshold or reduce their antimicrobial use by 10% compared to the previous calendar year. This support scheme serves as an example of how adopting a large-scale classification and monitoring system can contribute to reducing antimicrobial use. Moreover, the requirement for farmers who exceed the threshold to reduce their use by 10% annually provides short-term flexibility while still supporting steady progress toward long-term targets.

Support schemes related to health can be difficult to assess since contextual factors such as the type of production, the geographical location and the climate can determine the health risk faced by animals (e.g. colder climate might require actions to prevent respiratory issues). For the 22 schemes focusing exclusively on the health of animals, we considered that nine schemes support practices likely to significantly improve the health of animals, such as the adoption of a vaccination plan and hoof care.

It should also be noted that several schemes related to the health of animals require the monitoring or the assessment of the state of animals (e.g. foot-pad inspection, activity-time). These schemes might have a positive effect as they raise awareness of farmers about potential health consequences occurring on their holdings. For these schemes to improve the health and welfare of animals, they should be complemented by follow-up measures (e.g. treatment, adoption of practices reducing risks for animals) that are not necessarily part of the requirements laid down in the CAP strategic plans.

4.4 Provision of enrichment materials

The provision of enrichment materials can have a very positive effect on the welfare of animals, particularly for pigs (Mkwanazi et al, 2019) and for poultry (Kim et al, 2025). The European Commission (2016) states that providing a sufficient quantity of suitable materials is necessary to enable pigs to fulfil their innate needs to look for food, bite, root and manipulate. The enrichment materials provided, therefore, ought to be edible, chewable, investigable or manipulable. Enrichment materials in poultry farming should enable natural behaviour such as dustbathing, perching or pecking.

Overall, when referring to enrichment materials in this study, it should be understood as the modification of the environment of animals to make them more complex so that animals can perform behaviours important to them, such as nest building for sows or dustbathing for chickens (Business Benchmark in Farm Animal Welfare, 2023). Based on this definition, we identified several schemes that explicitly incentivise the use of enrichment materials. **13 CSP schemes, including one eco-scheme, two investment and ten environment and climate schemes, support actions providing enrichment materials to enable animals to adopt natural behaviour**. Most of these require farmers to ensure that animals (chickens or pigs) have access to these materials. The provision of enrichment materials aiming to enable animals to perform natural behaviour is considered a highly relevant practice, especially since it is one of only a few practices supported through the CSP schemes focusing on the behaviour of animals, which is the welfare component benefitting from the smallest share of the total budget allocated to animal welfare for the period 2023 – 2029 (see **Figure 2**).

These 13 schemes explicitly seek to provide enrichment materials in view of favouring the natural behaviour of animals. In this perspective, other schemes could potentially serve the same purpose, as depending on their implementation, they could potentially provide opportunities for manipulation, exploration or thermoregulation. We can identify different schemes which require farmers to provide straw for animals, as well as schemes focusing on the litter of animals and bedding.

In detail, seven schemes require farmers to provide straw for animals (i.e. pigs in the case of six and cattle in two schemes), for instance, through ensuring constant access to straw or the storing of straw for pigs. It must be noted that the EU Directive on the protection of pigs[41] lays down that "all *pigs must have permanent access to a sufficient quantity of materials such as straw, hay, wood, sawdust, mushroom compost, or peat*". Therefore, it remains unclear to what extent these schemes go beyond legal requirements.

[41] Directive 2008/120/EC laying down minimum standards for the protection of pigs

In addition, there are eight schemes aiming to improve animal litter and bedding, which could potentially be considered as providing enrichment materials. It must also be noted that the EU Organic Regulation[42] contains requirements related to litter, which "shall comprise straw or other suitable natural material", while it also requires the provision of a bed made of straw or other suitable material large enough to ensure that pigs can lie down.

4.5 Phasing out of cage farming

The European Citizens' Initiative named "End the Cage Age"[43] calls upon the Commission to take action to prohibit the use of cages in animal farming, emphasising the serious consequences that it can have on animal welfare. However, according to our assessment, **there are currently only 5**[44] **CSP support schemes that aim to support the phasing out of caged farming**. Among these schemes, three are investment measures, which can provide support for farmers aiming to transition towards cage-free systems. In total, 198 investments are expected to be covered under these schemes, for a total budget of EUR 37,7 million. However, given that these schemes serve multiple objectives and thus provide financial aid to a range of practices, only a share of the budget is likely to go towards actions to phase out cage farming.

The Spanish CSP incentivises measures to phase out cage farming through one environment and climate scheme, which, however, serves multiple objectives. Slovenia also provides such a scheme for poultry farmers, which specifies that the support will not be granted for poultry reared in cages, even enriched ones. In total, EUR 115 million will be allocated to these two schemes for the 2023-2029 period.

The assessment shows that **only a small number of CSP support schemes specifically address the phasing out of cage farming, and none of these schemes are exclusively aimed at this objective (**see **Box 7)**. Given the considerable impact that cage farming has on animal welfare and that in 2019, 49.5% of laying hens were still raised in cages in the EU (Kollenda et al, 2020), this is a missed opportunity.

[42] Regulation (EU) 2018/848 on organic production and labelling of organic products

[43] https://citizens-initiative.europa.eu/initiatives/details/2018/000004_en

[44] The five MS that adopted these measures are: Cyprus, Greece, Spain, Latvia and Slovenia

Box 7. Greece's investment scheme supporting transitions from cage farming

Investment support for shifting away from enriched cage to barn and free-grazing systems

Greece adopted an investment scheme that, among other objectives, aims to support farmers in transitioning away from cage farming. Under this scheme, farmers can receive co-financing for investments that facilitate the shift from enriched cages to either floor (barn) systems or free-grazing systems. Eligible investments include the installation of new silos, feed transmission systems, ventilation and cooling systems, lighting systems, and electrical panels. For those transitioning from barn rearing to free grazing, the scheme also covers the purchase or rental of additional land, construction of outdoor exits from poultry chambers, and necessary fencing.

While moving away from cage farming has the potential to improve animal welfare and reduce the environmental footprint of poultry farming (Bist et al., 2024), the scheme supports both barn and free-grazing systems. It therefore remains unclear what proportion of the allocated funds will ultimately support free-range systems, which offer the highest welfare benefits. Moreover, the scheme's total budget of EUR 17.7 million, intended to support 78 operations annually, will not be fully dedicated to cage-free transitions, as it also pursues two additional objectives (see Annex 7.3.3 for a full description of the scheme).

4.6 Overlooked animal welfare issues

The previous sub-sections highlighted several shortcomings and gaps in the CSP schemes for animal welfare and health for the current CAP programming period. For instance, we noted the lack of schemes aiming to phase out cage farming as well as the limited ambition of certain schemes designed to increase the space available per animal. **Although various components of animal welfare are targeted by CSP support schemes, some important welfare consequences are not addressed or are tackled in a way that is unlikely to result in meaningful improvements**.

Table 1 presents an overview of practices recognised by the scientific literature as relevant for animal welfare and health, and that are not widely supported through existing CSP support schemes. The second column provides details from the EU Organic Regulation to illustrate to what extent Member State schemes related to organic livestock farming can support the respective practices. While organic farming

generally leads to better animal welfare, it is important to note that some practices allowed under organic rules may still fall short of optimal welfare and may not fully align with EFSA recommendations (EFSA, 2023c).

Table 1. Overview of animal welfare practices lacking broad CSP support and their treatment under the EU Organic Regulation

Type of practice	
Coverage in CSPs	**Requirements as per Organic Regulation[45]**
Adapting lighting to animals' natural day-night cycles	
Two CAP support schemes mention lighting-related requirements. One example is the Polish eco-scheme, which mandates a six- to eight-hour period of darkness following the light phase for poultry.	The Regulation requires that buildings allow ample natural ventilation and light. Natural light may be supplemented with artificial lighting for a maximum of 16 hours per day, followed by a continuous rest period of at least eight hours without artificial light (applicable to poultry).
Reducing ammonia concentration	
Four support schemes mention ammonia. Two establish a maximum allowable concentration, one requires regular assessment, and one directs investments toward techniques that help reduce ammonia levels. In addition, six schemes include general objectives related to improving air quality.	Ammonia concentration is not explicitly mentioned in the organic regulation but is addressed indirectly through provisions on stocking density.
Managing growth rates through breed selection	
One support scheme requires farmers to monitor calf weight to ensure that growth rates do not compromise animal welfare**.**	To prevent the use of intensive rearing methods, the Regulation states that poultry must either be reared until they reach a minimum age or originate from slow-growing strains suited to outdoor systems.
Improved castration practices	
Four CAP schemes address castration practices (all under agri-environment-climate schemes). One mandates anaesthesia and veterinary oversight; two require pain management (e.g. analgesia); and one promotes rearing practices that avoid castration in sheep and goats.	Regarding mutilations, the Regulation states that: "Any suffering to the animals shall be reduced to a minimum by applying adequate anaesthesia and/or analgesia and by carrying out each operation at only the most appropriate age by qualified personnel."
Free/improved farrowing	
Five CAP support schemes relate to farrowing crates. Two support free farrowing (with one fully dedicated to this), while three support improved conditions, such as limiting the number of days sows may spend in crates or setting space requirements.	The use of farrowing crates is not explicitly prohibited. However, the Regulation states that the sow's movement may only be restricted for a "short period."
Phasing out/reduced tethering	

[45] Regulation (EU) 2018/848 on organic production and labelling of organic products

Type of practice	
Coverage in CSPs	**Requirements as per Organic Regulation[45]**
Only three CAP support schemes explicitly mention tethering. One requires that animals be untethered for at least two hours per day, a minimal and **arguably insufficient requirement, especially given the persistence of tethering in many EU farms**	Tethering is generally prohibited under the Regulation, except in specific cases where it is necessary for the animals' welfare.

The overview shows that several practices that have been demonstrated to increase the welfare of animals kept for farming purposes are only supported by a small number of schemes. For example, for broiler chickens, the choice of breed and its associated growth rate have significant welfare implications for the animals. In this regard, (Riber, 2024), found that chickens with faster growth rates had increased prevalence of leg disorders, poorer ability to walk and perform various behaviours, as well as increased prevalence of skin and cardiovascular disorders. EFSA (2023a) recommends the selection of breeds with a slower growth rate. The choice of breeds with a slower growth rate has notably been adopted within the "European Better Chicken Commitment" initiative, a voluntary commitment adopted by certain food companies across Europe[46]. However, many farms prioritise faster-growing over slower-growing breeds to optimise production efficiency and reduce costs through earlier slaughtering (European Commission, 2016a). The MS CSPs rarely mention this issue, and there is only one scheme offering support to farmers to monitor the weight of animals. Schemes supporting organic farming are likely to address this issue as the EU Organic Regulation prescribes that meat chickens must either be reared until they reach a minimum age (81d) or else come from slow-growing poultry strains adapted to outdoor rearing.

Another example is castration, which can cause serious suffering to the animals, and which is only addressed by four schemes. One of them incentivises farmers to abandon the practice of castration of sheep and goats, while the others require the provision of anaesthesia or pain medication during castration. Considering that castration is still very common, including in organic farming practices[47], this should be targeted more widely by the national CSPs. However, it must be noted that several MS have adopted national legislation related to castration. For instance, Belgium requires the use of

[46] https://betterchickencommitment.com/eu/commitments/

[47] Around a third of male pigs are raised as entire males, while 61% are still surgically castrated (Augère-Granier, 2020).

anaesthesia for the castration of piglets[48] and Finland will prohibit the castration of animals kept for farming purposes from 2034[49].

For the pig sector, an important concern is the use of farrowing crates, which cause movement restrictions and increase stress and frustration (Humane Society International/UK, 2024). These farrowing crates, as well as all other forms of extreme confinement for farmed animals, have been criticised by EU citizens, notably through the "End the Cage Age" initiative[50]. Currently, between 86 and 95% of sows are still confined in farrowing crates during the lactation period (Malak-Rawlikowska et al, 2024). However, only five CSP support schemes incentivise actions related to farrowing crates, with only two supporting free farrowing (see **Box 8**). The Organic Regulation also does not prohibit the use of farrowing crates. Additional funding to phase out farrowing crates would be needed, as it has been estimated that transitioning away from this practice at European level would require between EUR 3.8 billion and EUR 6.7 billion of investments (ibid).

Box 8. Finland's agri-environment and climate scheme to support free farrowing in the pig sector

One support scheme, adopted by Finland, is specifically dedicated to promoting free farrowing practices. To be eligible, farmers must ensure that sows can move freely before, during, and after the farrowing period. When using farrowing pens, these must meet specific criteria: a minimum size of 7 m^2, a solid floor, and a turning diameter of at least 170 cm. In addition, appropriate nesting material must be available to the sow at all times, and piglets must have access to at least 1 m^2 of space where they are protected from being crushed.

These requirements significantly improve sow welfare during farrowing by addressing the negative effects associated with traditional farrowing crates, such as restricted movement and increased stress.

Adequate payment levels are essential to offset the higher costs associated with free farrowing systems, such as the potential need to invest in specially designed pens. To this end, Finland set payment rates at EUR

[48] Arrêté royal autorisant l'exécution de la castration chirurgicale des porcelets mâles de maximum 7 jours par le responsable sur ses propres porcelets.

[49] Approved CAP Strategic plan, Finland, August 2022, https://mmm.fi/cap27/cap-suunnitelma

[50] https://citizens-initiative.europa.eu/initiatives/details/2018/000004_en

555 per livestock unit (LSU) per year. While this provides meaningful support, it may not fully cover the cost of new farrowing infrastructure, especially since the payment is made annually (see Annex 7.3.5 for a full description of the scheme).

These examples highlight that important animal welfare consequences remain insufficiently addressed and incentivised within national CSPs. While some Member States may support ambitious practices for one type of production, others may be left without targeted schemes, allowing lower standards to persist.

5. CONCLUSIONS AND RECOMMENDATIONS

The assessment of national CAP Strategic Plans (CSPs) reveals a varied but generally limited approach to improving animal welfare across the EU for the 2023–2029 programming period. The analysis of **136 support schemes** identified significant efforts by Member States to integrate animal welfare objectives into their CSPs, yet the ambition and scope of these remain uneven.

Most schemes supporting animal welfare improvements are funded under the EAFRD and include agri-environment and climate measures and investment aid. Only **18 eco-schemes**, financed through the EAGF, were established for the purpose of improving animal welfare. **Cattle are the most frequently targeted animal category**, while poultry, sheep, goats, and pigs receive comparatively less attention. Most schemes focus on improving animal health, followed by measures to improve the living environment. However, fewer schemes directly support natural behaviours, a crucial but underfunded component of animal welfare.

In financial terms, although **EUR 35 billion is allocated to schemes linked to animal welfare and health**, **much of this funding supports schemes with only indirect or unclear welfare impacts**. Organic farming and investment measures account for a significant share of the budget but are often directed toward broader sustainability goals rather than explicit welfare improvements.

A qualitative evaluation of the main practices supported through the CSPs shows that **grazing practices** are widely supported and generally considered to contribute positively to animal welfare, especially when minimum pasture access durations are enforced. However, many farmers already implement grazing practices, raising questions about the additional impact ("conversion effect") of these schemes.

Increasing space and reducing stocking density are frequently incentivised, yet most schemes propose only modest improvements beyond minimum legal requirements. Consequently, these measures are unlikely to deliver substantial welfare benefits, especially in the case of pigs and cattle.

Many Member States provide **support for actions to improve animal health**, typically including preventative measures such as **farm-level health plans and biosecurity strategies**. **Provision of enrichment materials**, especially for pigs and poultry, is recognised as a highly relevant welfare practice. While several schemes support this, details on implementation vary and often **lack clarity on whether they exceed legal obligations.**

Phasing out cage farming is minimally addressed. Only a handful of schemes directly support this transition, representing a missed opportunity to address one of

the most pressing welfare issues in European livestock farming. **Other practices which could make a meaningful contribution to animal welfare**, such as reducing ammonia concentrations through better ventilation, adapting lighting to animals' natural day-night cycles, managing growth rates through breed selection, using pain relief during castration, phasing out farrowing crates, and eliminating long-term tethering, **are only sporadically supported by national CSP schemes**.

In the next two years, MS can modify their current CSPs to adjust to changing conditions, and they are free to make significant alterations if they obtain the consent of the Commission. Consequently, they have the opportunity to improve their animal welfare schemes to some degree, although only within the boundaries of their discretion under CAP rules. However, since there is a limited time left before the current CSPs come to an end, major changes seem rather unlikely in most cases.

When drafting their CSPs for the next programming period, MS will be required to explain how their plans contribute to the CAP's specific objectives, including SO9, which aims to improve animal welfare and combat antimicrobial resistance (see Section 1). In addition, for his round of CSPs, the European Commission issued recommendations for each MS, focusing on key animal welfare and other environmental, economic, and social needs that should be addressed through the plans. Key animal welfare issues highlighted by these recommendations included routine tail-docking for pigs, cage system of laying hens or the biosecurity conditions in the pig sector (European Commission et al, 2023). While this might have provided some guidance to MS, for the next iteration of the CSPs, **animal welfare needs must be thoroughly identified and assessed as the basis for a coherent and comprehensive strategy**. A review of all ex-ante evaluations[51] of the current CSPs suggests that policy areas that have gained attention in the last CAP reform, including biosecurity and animal welfare, may have lacked sufficient data (European Commission, 2023b). A thorough analysis of national animal welfare issues should ensure that the CSPs address, comprehensively, those issues of importance to each MS.

The adoption of long-term objectives and milestones related to animal welfare at the European level could facilitate a better targeting of CSP support schemes to animal welfare goals. Establishing a structured framework for animal welfare, for example, setting clear targets to reduce stocking densities, phase out mutilations, adopt slower growing poultry breeds, or to phase out cage farming by a certain date,

[51] The ex-ante evaluation, as outlined in Article 139 of Regulation (EU) 2021/2115, assesses how each CSP contributes to the CAP's nine specific objectives, ensures internal coherence and alignment with other instruments, evaluates the consistency of budget allocations, examines whether expected outputs and targets are realistic, reviews efforts to reduce administrative burden, and, where applicable, analyses the rationale for using financial instruments funded by the EAFRD.

would provide more clarity and accountability. Steering CAP schemes toward long-term objectives would also help prevent support for "sub-optimal" practices that could hinder future progress by creating lock-in effects. The current lack of holistic approaches by MS, combined with the absence of an EU-level framework and long-term objectives for animal welfare, has resulted in many welfare consequences remaining barely addressed by the current CSPs, potentially undermining long-term improvements in the welfare of farmed animals. Beyond the adoption of long-term objectives specifically related to animal welfare, the adoption of strategies and targets related to livestock might have an impact on animal welfare as well. In this regard, the need to reduce GHG emissions from the climate footprint of the livestock sector has been acknowledged by the Commission in its communication on the future of agriculture[52], and could be discussed in the upcoming livestock strategy promised in the vision, as well as in the framework of the adoption of a 2040 climate target[53]. Such strategies could affect animal welfare, as they could include relevant welfare targets and incentivise a transition towards livestock production system, which are more beneficial for the welfare of animals, such as circular agriculture (Meijboom et al, 2023).

The **risk of a "fragmented" livestock production system across the EU** has been identified as a potential consequence of the current approach to supporting animal welfare through national CSPs. As different practices and types of investments are promoted by individual Member States, **CAP schemes related to animal welfare may inadvertently widen disparities in farming practices and competitiveness within the livestock sector**. Such fragmentation could pose several challenges. Firstly, if efforts are made to revise the existing animal welfare legislation, a move widely considered necessary due to current shortcomings (EPRS, 2023), differing national approaches could complicate the reform process. Member States whose domestic production systems would be more heavily impacted may resist changes, potentially weakening efforts to achieve significant improvements and resulting instead in only minimal harmonisation. Furthermore, a fragmented framework could discourage Member States from pursuing more ambitious animal welfare schemes, particularly where lower standards elsewhere offer a competitive advantage in production.

EU-level objectives and milestones as described above, possibly based on a revised legislative framework for animal welfare, would inform the shape and content of the next version of the CAP, which is due to be introduced from January 2028.

If the current structure of the CAP remains, these could be integrated through the revision of minimum standards for animal welfare, which requires farmers to comply

[52] COM(2025) 75 final, A Vision for Agriculture and Food. Shaping together an attractive farming and agri-food sector for future generations
[53] COM(2024) 63 final, Securing our future Europe's 2040 climate target and path to climate neutrality by 2050 building a sustainable, just and prosperous society

with basic legislation[54] through the conditionality system. As an alternative, minimum requirements related to animal welfare, with a similar functioning to the GAECs[55] under the current CAP, could be considered. They could, for instance, prohibit certain mutilation practices or, potentially, after a transition phase and financial compensation, prohibit the use of cages.

Recommendations for the EU-level

1. **Ensure CAP funding supports long-term, structural improvements**. CAP funding should prioritise long-term, structural improvements in animal welfare, rather than short-term compensation schemes. EU policy should guide Member States in shifting funding toward investments such as pasture infrastructure, rotational grazing systems, enriched housing, and animal welfare monitoring systems. This shift must be supported by clear EU-level objectives and time-bound targets (as set out in Recommendation 2), alongside the formal recognition of animal welfare as a standalone CAP objective (Recommendation 3). Furthermore, CAP funding should be made conditional on compliance with strengthened minimum welfare requirements (Recommendation 4), ensuring that support is only directed toward practices and systems that are aligned with improved and enforceable welfare outcomes.

2. **The EU should adopt long-term animal welfare objectives and targets**. The EU should consider establishing clear, and time-bound objectives for animal welfare through the pending review of its animal welfare legislation. These could include the progressive phasing out of harmful practices (e.g. long-term tethering) and the definition of minimum welfare requirements. Having clear EU-level objectives would provide greater predictability for farmers and Member States when designing CAP Strategic Plans and reduce suboptimal investments that might otherwise hinder progress toward long-term goals.

3. **Elevate animal welfare to a standalone CAP objective.** In support of the EU long-term animal welfare goals proposed above, animal welfare should be formally recognised as a distinct objective of the CAP. This might enhance coherence across Member States and raise the overall level of ambition in national strategies. To adequately track progress toward meeting animal welfare objectives, the existing PMEF should be reworked to combine both quantitative (e.g. number of animals

[54] All farmers must respect Statutory Management Requirements (SMR), which include EU rules on public, animal and plant health, animal welfare, and the environment (European Commission).

[55] In addition to the SMRs, farmers receiving CAP support have to respect EU standards on good agricultural and environmental condition of land (GAEC), which set 9 standards related to the condition of farmers land aiming to preserve environment and biodiversity features.

covered, reduction in specific practices) and qualitative indicators (e.g. behavioural outcomes, space and enrichment quality).

4. **Strengthening minimum animal welfare requirements in the CAP.** Minimum animal welfare requirements under the CAP should be improved. Current support schemes often overlook serious negative impacts of livestock farming, such as chronic health issues, lack of mobility, and behavioural restrictions, leaving animals subject to low welfare standards. A revision of the legislative framework for animal welfare, as recommended above, could ensure a higher baseline. As an alternative, a system of minimum animal welfare requirements, functioning similarly to the current GAECs[56] under CAP conditionality, could be introduced. These could include bans on specific mutilation practices and harmful farming practices (e.g. mandatory untethering for part of the day). One important basic requirement could be to restrict CAP payments to farmers rearing breeds genetically suited to good welfare outcomes[57]. However, this approach only makes sense if CAP payments remain conditional on environmental and animal welfare standards beyond existing legislation. The recent simplification of GAECs risks undermining this system[58]. If conditionality is weakened or removed, stronger legislation will be essential to ensure meaningful protections.

Recommendations for EU Member States

5. **Conduct a more comprehensive assessment of animal welfare needs in CAP Strategic Plans**, ensuring that currently overlooked issues, such as tethering are systematically identified and addressed.
6. **Assess the financial requirements for achieving specific animal welfare objectives** at the Member State level. This includes estimating the costs of achieving strategic goals (e.g. ending cage farming) and identifying the most effective types of support. Structural investments (e.g. monitoring systems, pasture infrastructure) may deliver lasting improvements, while some objectives are better

[56] In addition to the SMRs, farmers receiving CAP support have to respect EU standards on good agricultural and environmental condition of land (GAEC), which set 9 standards related to the condition of farmers land aiming to preserve environment and biodiversity features.

[57] Many commonly used high-yield breeds, such as fast-growing broiler chickens, suffer from serious health and welfare problems linked to their genetic traits (see e.g., Hartcher and Lum, 2019).

[58] In 2024, the Commission adopted a first CAP Simplification Package which mainly focused on removing and allowing more flexibilities in the implementation of environmental standards. This was followed by a second Simplification Package proposing 25 amendments to the Common Agricultural Policy (CAP) legislation, allowing inter alia CAP payments for actions that merely meet regulatory requirements, rather than exceed for selected GAECs.

addressed through incentivised practices (e.g. grazing, enrichment). Support must be tailored to the type and scale of change required.

7. **Include at least one eco-scheme dedicated to animal welfare in each national CAP Strategic Plan**. Complement annual payments with targeted investment schemes to help farmers cover upfront costs associated with transitioning to higher-welfare systems, such as free farrowing pens.
8. **Ensure CAP funding prioritises long-term, structural improvements in animal welfare**, rather than short-term compensation. Investments should support sustainable changes, such as the transition from intensive indoor farming to free-range and outdoor-access systems.
9. **Align national implementation with existing EU animal welfare legislation**, including the elimination of practices already prohibited under EU law (e.g. tail docking as per Council Directive 2008/120/EC).
10. **Harmonise requirements with best practice recommendations**, ensuring alignment with scientific standards and advice, particularly those issued by EFSA. To improve clarity and enforceability, the actions required of farmers should be precisely defined. For example, schemes that incentivise improved bedding practices should clearly specify the quantity and frequency of straw application.
11. **Move beyond passive record-keeping and strengthen enforcement mechanisms** to ensure active compliance and meaningful improvements on the ground.

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7. ANNEX

7.1 Summary of the key schemes supported by EAGF and EAFRD

EAGF	EAFRD
Decoupled direct payments: Basic Income Support for Sustainability (BISS), Article 18-28: *Decoupled payment based on the number of eligible hectares on a farm, with a (declining) number of environmental conditions. This measure absorbs the largest share of CAP expenditure*. Redistributive income support: (CRIS) Article 29: *A second, complementary, form of basic direct payments, which is based on farm area, like BISS but more skewed towards medium and smaller sizes of farm.* Young Farmers income support, Article 30: *payments for young farmers to help them to start farming. These can be annual payments based on the size of their land or one-time lump sums.* **Eco-schemes,** Article 31: *Voluntary schemes that reward farmers who adopt practices that benefit the environment or help address climate change or raise farm animal welfare standards above the legal minimum.* ***Coupled direct payments,*** Article 36-41***:*** Coupled income support (CIS): Most *Member States run schemes that offer payments directly attached to levels of production (e.g. number of cows) on farms in sectors that they judge important for the economy or environment but are facing challenges.* ***Sectoral interventions***, Article 42-48***:*** *Payments to support specific sectors like fruits and vegetables, wine, honey production, hops, and olive oil. These payments cover a range of aids including support for new investment costs.*	***Rural Development:*** Environment, climate and animal welfare schemes (ENVCLIM) Article 70: *Payments for farmers who voluntarily adopt or maintain practices that help with climate change, protect natural resources, preserve biodiversity or involve farm animal welfare practices more beneficial than required by legislation.* Investment aid measures (INVEST), Article 73-74: *Support for investments in a wide range of assets, predominantly on farms, including buildings and equipment, that contribute to one or more of the specific objectives of the CAP (see Annex).* Areas of natural constraints payments (ANC) Article 71: *Payments to farms in areas that are relatively difficult to farm, like mountains or regions with poor soil or extreme weather conditions.* Cooperation measures (COOP) Article 77: *Payments to incentivise collaboration, such as creating cooperatives or working together across different parts of the supply chain.* Knowledge exchange Article 78: *Support for advisory services to help farmers adopt more productive and sustainable practices and share information.* New/young farmers and rural business start-ups Article 75: *Additional support can be provided by MS to young farmers and people starting rural businesses, including helping them set up new farms.* Compensation for disadvantages due to certain mandatory requirements Article 72: A scheme used by some MS to compensate *farmers for the costs they incur when they have to comply with specific environmental regulations.*

7.2 Animal welfare legislation, best practice guidance and other sources consulted for the review of CSP support schemes covered by this study

Animal category	Legislation	References used to determinate the best practices
Poultry	Council Directive 2007/43/EC of 28 June 2007 laying down minimum rules for the protection of chickens kept for meat production Directive 1999/74/EC — minimum standards for the protection of laying hens	EFSA Panel on Animal Health and Welfare. "Welfare of broilers on farm." EFSA Journal 21, no. 1 (2023): 7788. https://doi.org/10.2903/j.efsa.2023.7788 EFSA Panel on Animal Health and Welfare "Welfare of laying hens on farm". EFSA Journal 21, no. 2 (2023); 7789. https://doi.org/10.2903/j.efsa.2023.7789
Pigs	Council Directive 2008/120/EC of 18 December 2008 laying down minimum standards for the protection of pigs	EFSA Panel on Animal Health and Welfare. "Welfare of pigs on farm". EFSA journal 20, no 8. (2022): 72. https://doi.org/10.2903/j.efsa.2022.7421
Cattle	Directive 2008/119/EC — minimum standards for the protection of calves	EFSA Panel on Animal Health and Welfare. "Welfare of dairy cows on farm." EFSA Journal 21, no. 5 (2023): e7993. https://doi.org/10.2903/j.efsa.2023.7993. EFSA Panel on Animal Health and Welfare. "Welfare of calves". EFSA journal 2, no 3 (2023): e7896 https://doi.org/10.2903/j.efsa.2023.7896
General	Directive 98/58/EC - Protection of animals kept for farming purposes	No animal left behind, 2021, Eurogroup for Animals European Commission: Agrosynergie, COGEA, Directorate-General for Agriculture and Rural Development and Oréade-Brèche, Study on CAP measures and instruments promoting animal welfare and reduction of antimicrobials use, Publications Office of the European Union, 2022, https://data.europa.eu/doi/10.2762/297287

7.3 Case studies

7.3.1 Poland's eco-scheme dedicated to animal welfare

Context of the scheme

Poland has the 4th highest number of farm animals in the EU, with 10,000,000 LSU in 2020[59]. Cattle sector makes up the largest share with 4,650,400 LSU, followed by pigs with 2,867,000 LSU[60]. The poultry sector is also considerably large with 2,458,300 LSU[61], accounting for 24.6% of the livestock sector in Poland, the second highest percentage in the EU[62] (all figures for 2020).

The Commission highlighted the following welfare consequences in the Polish livestock sector in need of improvement: **tail docking of pigs remains a routine practice despite being prohibited, farms with low biosecurity and poor controls are at higher risk for animal disease infections and spread**, such as African swine fever (ASF), and 80% of poultry animals were reared in cages in 2020, which is significantly higher than the EU average (50%)[63], and concerning considering the size of the poultry sector in Poland (European Commission, 2020).

Poland adopted three support schemes related to animal welfare in their CAP Strategic Plan for the current CAP period: two investment schemes and one eco-scheme. The first investment scheme concerns the prevention of African Swine Fever (AFS), through the improvement of biosecurity on farm. The second investment scheme focuses on the welfare of pigs and cattle, through investments ensuring outdoor or grazing access for cattle (e.g. securing grazing facilities), as well as investments ensuring the movement of sows and piglets. Finally, **Poland adopted an eco-scheme with a significant budget, targeting several welfare components and animal categories**. The following sections provide a detailed description and assessment of this eco-scheme.

[59] 2020 data reported by Eurostat, Agri-environmental indicator – livestock patterns, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agri-environmental_indicator_-_livestock_patterns, accessed 07 May 2025
[60] 2020 data reported by European Commission Agri-food Data Portal, Context Indicator 21, https://agridata.ec.europa.eu/extensions/IndicatorsSectorial/LivestockUnits.html, accessed 07 May 2025.
[61] Idem
[62] 2020 data reported by Eurostat, Agri-environmental indicator – livestock patterns, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agri-environmental_indicator_-_livestock_patterns, accessed 07 May 2025
[63] Idem

Description of the scheme[64]

Poland's animal welfare eco-scheme (I 4.6) related to animal welfare covers a range of animal categories and practices, with specific requirements defined for each category. We can differentiate two sets of obligations: for poultry, horses, sheep and goats, all the requirements must be met by farmers, while they can choose from a points-based 'menu' of actions for pigs and cattle. Additionally, farmers implementing this eco-scheme are required to attend a one-time training on methods to reduce the use of antibiotics, as well as to adopt an animal welfare improvement plan (except for dairy cows).

The rates indicated for the different practices are the amount paid per livestock unit per year. This applies to both sets of obligations. Within Poland's CAP Strategic Plan, a "Conversion coefficient to LSU" is associated with every livestock category (see below). This coefficient is an indication of the ratio between the number of heads and the number of livestock units it represents. For instance, the conversion coefficient for goat is 0.1, meaning that one livestock unit would represent 10 goats.

Mandatory requirements

As explained above, farmers committing to this eco-scheme are required to implement the following practices for the respective livestock category:

Mandatory actions per category	Estimated rate	Coefficient
Sheep		
• Grazing or access to an exercise yard, for at least 120 days during the grazing period • At least 20% increased living space in rooms/buildings, compared to the minimum legislation	347€	0.1
Laying hens		
• Ban on beak trimming • Ensuring maintenance without cages • Providing increased living space in the henhouse - stocking density not greater than 7 birds/m^2 of usable floor area • Providing increased nest availability: in case of individual nests - no more than 5 laying hens/nest, and in case of group nests - no more than 96 laying hens/m^2 of nest area • Providing perches with a length of min. 0.2m/laying hen • Providing constant access to materials or objects absorbing attention of a quality that does not have a harmful effect on health	227€	0.014
Broiler chickens		

[64] The information used in this section comes from Poland's CAP strategic plan and the catalogue of CAP interventions, which was consulted on 08 May 2025.

Mandatory actions per category	Estimated rate	Coefficient
• Providing increased living space in the henhouse - maximum stocking density not greater than 30 kg/m² and simultaneously not greater than 20 birds/m² • Providing a minimum of 6 hours of dark phase/day following the light phase of illumination • Providing constant access to materials or objects absorbing attention of a quality that does not have a harmful effect on health	6.42€	0.007
Turkeys		
• Providing increased living space in the room/building - maximum stocking density not greater than 50 kg/m² • Providing 8 hours of dark phase/day following the light phase of illumination • Providing constant access to materials or objects absorbing attention of a quality that does not have a harmful effect on health	22€	0.03
Horses		
• Keeping without tethering A) Increased living space: • During the vegetation season - grazing or access to outdoor areas for at least 140 days (for min. 6 hours per day) • Outside the vegetation season - access to outdoor areas or exercise areas for min. 2 hours per day with an area in case of adult horses/young - 70m²/animaMare with foal - 85 m²/animal • Boxes or in case of free-stall housing in rooms/buildings - area increased by at least 20% compared to minimum requirements B) Open system: • Roofing with an area allowing all horses to stay simultaneously under this roofing • Bedding under the roofing • Outdoor area increased by at least 20% compared to the area required for the open system	A: 121€ B: 55€	0.8
Goats		
• Keeping without tethering. • Access to an exercise yard throughout the year - with an area increased by at least 20%, compared to minimum standards • Grazing for at least 120 days during the vegetation season • Increased living space by at least 20% in rooms/buildings, compared to minimum standards	335€	0.1

Point-based system

The second part of the scheme operates on a points-based system where each eligible practice is assigned a specific number of points. In order to qualify for the payments, farmers must accumulate a minimum number of points with the threshold based on the size of the farm. For instance, a farm of 10ha will need fewer points than a farm of 100ha. Once the threshold is achieved by farmers, every point obtained is valued at

100 PLN, meaning that a farm accumulating 150 points will receive 15,000 PLN per year.

The basic condition for participating in the eco-scheme is the implementation of a practice that provides animals with increased living space in their housing facilities. This requirement must be met before other practices can be implemented (and remunerated) for the same animal category (except for dairy cows).

1) Sows

    a) Mandatory actions:

    - Sows are not kept in a yoke system; however, sows may be kept in a yoke during the perinatal period for no longer than 14 days

    - Increased living space: Sows are provided with at least 20% or at least 50% increased living space in rooms/buildings compared to minimum requirements. (7.8 points for 20% and 18.6 for 50%)

    b) Optional actions:

    - Weaning piglets: Piglets are weaned no earlier than on the 35th day from their birth. (5.4 points)

    - Bedding: Ensuring maintenance on straw bedding or similar material on a surface allowing for the simultaneous rest of sows. (3.2 points)

Conversion coefficient to LSU: 0.5

2) Fattening pigs:

    a) Mandatory actions:

    - Increased living space: Fatteners are provided with at least 20% or at least 50% increased living space in rooms/buildings, according to the table specifying the minimum sizes of these areas. (4 points for 20% and 6 points for 50%).

    b) Optional actions:

    - Bedding: Ensuring maintenance on straw bedding or similar material on a surface allowing for the simultaneous rest of animals. (6 points)

Conversion coefficient to LSU: 0.3

3) Dairy cows:

For dairy cows, farmers can choose grazing practices independently from other measures, but for other voluntary practices, they require the uptake of the measure related to increased living space (whether it concerns the 20% option or the 50% option).

a) Mandatory actions (except if only grazing is selected):

- Increased living space: Dairy cows kept in groups without tethering in free-stall housing are provided with at least 20% or at least 50% increased living compared to minimum requirements (6.9 points for 20%, 10 points for 50%)

b) Optional actions:

- Grazing: Dairy cows are provided with at least 120 days of grazing during the vegetation season, without tethering (for min. 6 hours per day); (3.1 points).
- Bedding: Ensuring maintenance on straw bedding or similar material or designating a part with straw bedding or similar material on a surface allowing for the simultaneous rest of cows. (1 points).
- Exercise yard: Providing an exercise yard for at least 4 hours a day throughout the year. (2 points).
- Calf weaning: Calves are weaned no earlier than on the 5th day from their birth. (1.7 points).

Conversion coefficient to LSU: 1

4) Suckler cows

Requirements cover suckler cows, calves, fattening cattle up to 300 kg body weight, and heifers used for meat production.

a) Mandatory actions:

- Animals must be kept without tethering
  Increased living space: Animals are provided with at least 20% or at least 50% increased living space in rooms/buildings compared to minimum requirements. (3.6 points for 20% and 9.1 points for 50%)

b) Optional actions:

- Bedding: Ensuring maintenance on straw bedding or similar material or designating a part with straw bedding or similar material on a surface allowing animals for simultaneous rest. (0.9 points)

- Exercise yard: Providing an exercise yard for at least 4 hours a day throughout the year; (1.5 points)
- Grazing: Ensuring grazing for at least 120 days during the vegetation season (for min. 6 hours per day). (1.5 points)

Conversion coefficient to LSU: 1

5) Fattening cattle:

a) Mandatory actions:

- Animals must be kept untethered
  Increased living space: Animals covered by the requirements are provided with at least 20% or at least 50% increased living space in rooms/buildings compared to the minimum requirements. (1.1 points for 20% and 2.9 points for 50%)

b) Optional actions:

- Bedding: Ensuring maintenance on straw bedding or similar material or designating a part with straw bedding or similar material on a surface allowing for simultaneous rest of animals. (1.3 points)
- Exercise yard: Providing an exercise yard for at least 4 hours a day throughout the year. (4 points)
- Grazing: Ensuring grazing for at least 120 days during the vegetation season (for min. 6 hours per day). (4.1 points)

Conversion coefficient to LSU: 0.7

Finally, under this eco-scheme, a "simplified" payment is introduced for farmers that keep animals under national quality schemes requirements (QMP for bovine and QAFP for pigs, broiler chicken and turkeys) or under organic farming, which puts a particular emphasis on reducing the use of antibiotics.

It must be noted that the payments made within this scheme follow a degressive method. This means that the payment for the first 100 LSU will be 100% of the rates associated with each measure, the payment for the LSU between 100 and 150 will be 75% of the rates, while there will be no payments for livestock units above 150.

The total public expenditure planned for this eco-scheme is EUR 1,270 billion for the 2023-2029 period, which is one of the highest budgets allocated to an animal welfare

scheme by a Member State under the current CAP. Likewise, with 2,7 million LSU planned to be covered, a significant number of animals may fall under this eco-scheme.

Assessment of the scheme

A common requirement for all the animal categories covered by this eco-scheme is that farmers must **increase the living space of animals**. For the animal categories falling under the point-based system, farmers can choose between an increase in the minimum space of 20% or 50% compared to the minimum requirements laid down in the national legislation[65], while for goat, sheep and horses, farmers must increase the available space by animal by 20%. However, the requirements related to the space allowance per animal under this eco-scheme, whether it concerns an increase of 20% or 50%, do not always meet the EFSA recommendations. For instance, an increase of 50% of the space for dairy cows raised indoors compared to the minimum requirements equals a living area of 5 m^2 per cow or 6.8 m^2, depending on the presence of a lying stall[66], while EFSA (2023c) recommends 9 m^2 per cow raised indoors. While it is positive that providing increased space is a mandatory requirement for all animal categories, the relatively modest ambition of these is notable, particularly considering that for the point-based measures, it is the only compulsory action and receives high payment rates compared to other supported practices.

Alongside these mandatory requirements, some of the optional measures may have a positive impact on animal welfare. **Bedding practices** for cattle and pigs which consist of ensuring maintenance of straw bedding or similar material on a surface allowing animals to rest at the same time, could potentially improve animal welfare (EFSA, 2023c). However, since detailed obligations are missing, e.g. detailing the amount of straw required per day per square meter, the effectiveness of these practices for improved animal welfare are difficult to judge. Likewise, the **grazing practices,** which are optional for cattle and mandatory for sheep and goat, could contribute to increasing the welfare of the animals (Pe'er et al, 2023). Farmers are asked to provide grazing opportunities for animals for a minimum of 120 calendar days per year, which is less than the duration of the grazing season in Poland (usually around six months[67]) but can still have a positive effect on the welfare of animals. The provision of an **exercise yard** for four hours per day throughout the year, which is an optional measure for cattle, can also be beneficial, especially if the available living area per animal is low

[65] Regulation of the Minister of Agriculture and Rural Development of 28 June 2010 on the minimum conditions for keeping farm animal species other than those for which protection standards have been laid down in EU regulations (Journal of Laws No. 116, item 778) https://www.ecolex.org/details/legislation/regulation-on-minimum-conditions-of-keeping-certain-species-of-livestock-lex-faoc113714/

[66] Poland CAP Strategic Plan, version 5.1, p.517

[67] Poland statistical office, https://stat.gov.pl/en/metainformation/glossary/terms-used-in-official-statistics/2175,term.html

(Shepley, 2020). The provision of an exercise yard is also mandatory for sheep and goat farmers who do not provide grazing opportunities, for the duration of the grazing season.

Optional measures for farmers also include **improved weaning practices** for piglets and calves. For piglets, the eco-scheme compensates farmers who ensure the weaning of piglets after 35 days. This is seven days later than the minimum requirements as per legislation, which is positive but still below EFSA (2022b) recommendations. EFSA (ibid.) suggests that weaning should be done gradually, concluding that weaning at seven weeks has a more positive effect on stress levels in piglets. Regarding the weaning of calves, the optional measure prohibits the weaning before the calf is 5 days old, explaining that this refers to the separation of the calf from the dam and not the transition from milk to solid feed for the calf. Such practices may have positive effects on the welfare of animals, as EFSA (2023d) concludes that increasing the duration of the contact between the cow and the calf beyond 24 hours has positive effects on the welfare of animals.

The eco-scheme also lays down mandatory requirements for poultry farmers, which may concern broiler chicken, laying hens and turkey. Unfortunately, **stocking density** requirements for broiler chickens do not meet EFSA recommendations. The eco-scheme defines a maximum stocking density of 30kg/m^2 for broiler chicken while EFSA (2023a) recommends a reduction of the stocking density to a maximum of 11kg/m^2. However, additional requirements may contribute to the improvement of the broiler welfare, including the obligation to **respect a dark phase** of six hours following the illumination phase (EFSA, 2023b), as well as the **provision of enrichment material** (Kim et al, 2025). However, the expected rate for the welfare of broiler chicken appears to be particularly low, especially compared to the expected rates for laying hens.

Regarding the measures related to **laying hens**, the **prohibition of beak trimming and cage-farming** is can make a meaningful contribution to increasing animal welfare (EFSA, 2023b). The requirement related to the **stocking density of laying hens**, which should not be greater than 7 birds/m^2 under this measure, does not meet the recommendations of EFSA (2023b), which considers that beyond 4 birds/m^2, the risk of plumage damage increases and the capacity of the hens to perform motivated behaviours (e.g. wing flapping) may reduce. Requiring the **provision of one nest for five laying hens** in case of individual nesting may slightly reduce the nesting competition and have positive effects on the welfare of animals. As a comparison, for individual nesting, EFSA (2023b) recommends that at least one nest for seven hens should be provided. In case of group nests, farmers are required to provide a nest area for a maximum of 96 laying hens/m^2, which complies with the recommendation of a maximum of 120 hens/m^2 in the nesting area formulated by EFSA (2023b). Requiring the **provision of perches** with a length of 20cm per hen does not represent a

significant improvement compared to the basic legislation, which requires perches with a length of 15cm per hen. However, the final requirement, consisting of the provision of enrichment material, if implemented correctly, could improve the welfare of laying hens (Kim et al, 2025).

Finally, some of the requirements that we already mentioned, such as grazing opportunities, the increase of space and the provision of an exercise yard, also apply to sheep and goats. Additionally, the **prohibition of keeping the goats tethered** is relevant for the welfare of animals (Hydbring-Sandberg et al, 2022).

In summary, some of the practices supported by the eco-scheme have the potential to improve the welfare of animals, such as the prohibition of tethering and beak trimming, grazing practices and the provision of enrichment material. On the other hand, some practices supported could have been more ambitious (e.g. stocking density), as, in their current form, they are expected to only result in minimal improvements of the welfare of the respective animal category.

Recommendations to increase the animal welfare effects of this intervention include:

- The requirements related to the increase of space per animal and the stocking density should be aligned with EFSA recommendations in order to significantly improve the welfare of animals.
- More precise requirements should be formulated for the bedding practices, as they remain broad. For instance, the requirement could mention the amount of and frequency with which straw should be detailed.

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7.3.2 Cyprus' agri-environment-climate scheme to improve the welfare of cattle, pigs, sheep, and goats

Context of the scheme

Cyprus has a relatively small livestock population compared to larger EU Member States, with only around 23.9% of farms rearing livestock[68]. However, in terms of livestock density, measured in livestock units (LSU)[69] per 100 ha of utilised agricultural area (UAA)[70], in 2020, the average density in Cyprus was reported at 1.7 LSU/100 ha UAA, which is above the EU-27 average of 0.7 SLU/100 ha UAA for the same year[71].

In most EU countries, cattle accounts for the majority of total LSU. In contrast, the largest livestock category in Cyprus (in % of total LSU) are pigs (31.0 %), followed by cattle (27.8%), poultry (16.7%), sheep (14.3%) and goats (10.1%). Between 2010 and 2020, livestock densities decreased across the EU as whole by 4.0 %. In Cyprus, however density has increased by 1.9% over the same period[68].

The CAP Strategic Plan for Cyprus[72] acknowledges that livestock farming conditions are often not welfare-friendly, due to factors such as **cage use, poor flooring, and inadequate insulation**. The latter is especially important since high temperatures and humidity prevailing during the summer and not just months, the intense daily temperature fluctuations and the frequent presence of high levels of dust are factors that cause additional suffering to the animals. Indeed, the European Commission (2020) noted in their recommendations for Cyprus' CAP strategic plan that "certain animal husbandry practices, such as the **tail docking of pigs, are still a routine practice**, although this is prohibited by EU legislation" (p.4). Further, Cyprus has the highest veterinary antimicrobial in Europe which is monitored through the sales of antimicrobials for food-producing animals (EEA, 2024). However, recent years have

[68] 2020 data reported by Eurostat, Agri-environmental indicator – livestock patterns, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agri-environmental_indicator_-_livestock_patterns, accessed 02 April 2025.
[69] Livestock unit, a reference unit which facilitates the aggregation of livestock from various species and age as per convention, via the use of specific coefficients established initially on the basis of the nutritional or feed requirement of each type of animal. The reference unit used for the calculation of livestock units (=1 LSU) is the grazing equivalent of one adult dairy cow producing 3 000 kg of milk annually, without additional concentrated foodstuffs.
[70] Utilised agricultural area, the total area taken up by arable land, permanent grassland, permanent crops and kitchen gardens used by the holding, regardless of the type of tenure or of whether it is used as a part of common land.
[71] 2020 data reported by European Commission Agri-food Data Portal, Context Indicator 21, https://agridata.ec.europa.eu/extensions/IndicatorsSectorial/LivestockUnits.html, accessed 02 April 2025.
[72] The CAP Strategic Plan (in Greek) is available here: http://www.cap.gov.cy/moa/cap/cap.nsf/home/home?openform

seen a notable decline. The primary concern is pig farming, which accounts for the highest antibiotic use (European Commission, 2020).

The Cyprus CAP Strategic Plan (CSP) supports animal welfare improvements through a mix of interventions (see Box below) requiring beneficiaries to implement sheep and goat welfare obligations (eco-scheme), improvements for pig farming (eco-scheme), conservation of traditional livestock breeds (eco-scheme). Further, the plan highlights the need to transition away from cage-based systems, aligning with EU legislative changes, and supports farmer training to phase out harmful management practices, such as tail docking in pigs and beak trimming in poultry. Finally, to reduce antibiotic use in pig farming, the plan provides one scheme focusing on improved management practices and disease prevention strategies.

Description of the scheme[73]

The Cypriot CSP contains several interventions designed to contribute to improved animal welfare. **One agri-environment-climate scheme (ENVCLIM A.A. 1.7) specifically targets the welfare of cattle, pigs, sheep, and goats**. The actions farmers must take to receive payments depend on the specific animal category:

For sheep and goat, at least three of the following four actions must be implemented, and beneficiaries are required to participate in training on the specific actions to be taken. Farmers committing to this scheme need to own at minimum 34 females, and the number of animals must remain stable throughout the duration of implementation period:

- Enhancing biosecurity: Farmers must take steps to protect their animals from disease by disinfecting entry points, keeping detailed records, and controlling pests like rodents. A secure fence around the farm is also required.
- Preventing lameness: Proper hoof care and maintaining clean, dry living areas help keep animals healthy and free from mobility issues.
- Managing parasites: Regular checks and treatments are needed to control mites, ticks, fleas, and other parasites that can affect animal health.
- Ensuring good physical condition: Animals must be well cared for during critical stages like reproduction and birth, with a focus on proper nutrition and eliminating unnecessary procedures like castration.

For pigs, beneficiaries need to take the following actions to reduce tail-biting:

[73] The description of the interventions presented in this section is based on information and data provided in the Catalogue of CAP interventions, accessed 02 April 2025.

- Preserving animal tails: At least 90% of the animals must retain their tails to promote natural behaviour and well-being.
- Providing more space: Animals should be housed in enclosures that are 15% larger than the legal minimum to improve comfort and mobility.
- Maintaining air quality: Daily monitoring of air pollutants is required, along with measures to enhance ventilation and cleaning. Ammonia levels should stay below 15 ppm, and carbon dioxide below 2,500 ppm.
- Ensuring proper water supply: A weekly assessment must confirm that water flow is adequate, ensuring every animal has consistent access to fresh water.
- Monitoring enrichment materials: Records should be kept on the use of enrichment materials, including how often they are replaced and in what quantities, to support animal well-being.

For dairy cows, at least one of the following measures must be implemented:

- More space in free-housing systems: Each year, the available space per cow must increase by 5%. This is achieved by gradually reducing the number of cows in the housing area.
- More space in individual resting areas: For farms with individual resting spaces, the available space per cow must grow by at least 3% annually, also by reducing herd size.

Finally, farmers can choose to adopt one or several the following voluntary measures, each of which can impact payment levels:

- Hoof health monitoring: Keeping records of the condition of animals' hooves to ensure proper care.
- Veterinary care and vaccination: Regular veterinary visits and the implementation of a vaccination plan to maintain herd health.
- Specialised nutrition plans: Consulting a specialist to develop tailored diets that meet the animals' specific needs.
- Rodent control oversight: Conducting regular inspections for rodent control and maintaining records of prevention measures.
- Electronic monitoring: Using an advanced electronic system to track and monitor animal health and behaviour.

Beneficiaries must commit to implementing the required welfare improvements for goats, sheep, and pigs for at least one year, and for at least two years for cows.

The total budget allocated to this scheme is €9.7 million for the period 2023 to 2027, with €7.76 million coming from the EU budget. The intervention aims to cover 26,000 livestock units annually.

Payment levels are as follows:

- Sheep and goats: €98 per livestock unit (LSU)
- Pigs: €30 per LSU
- Dairy cows:
    - If the first requirement is met: €80 per LSU
    - If the second requirement is met: €48 per LSU
    - In addition, there are five optional welfare measures for dairy cows, each linked to additional payments. However, most of these payments are quite low—four out of five are below €5 per LSU, with only electronic monitoring receiving a higher payment of €21 per LSU.

Other schemes in the Cypriot CSP linked to antimicrobial and animal welfare

*ENVCLIM A.A. 1.5 - Commitment to Reducing Antibiotic Use***:** Under this intervention, beneficiaries must establish a contract with a private veterinarian, who will visit the farm once or twice a month, depending on its size. Farmers are required to submit an annual vaccination program and ensure its implementation in collaboration with the contracted vet. Additionally, they must provide a biosecurity plan prepared by the vet, who will also maintain treatment records. Each farm must undergo a laboratory health assessment once a year to evaluate animal health status.

ENVCLIM A.A. 1.4 - Organic Farming and Livestock Production: This intervention supports farmers transitioning to or maintaining organic farming, including organic livestock production. Livestock farmers must commit to a five-year period to be eligible for payments.

INVEST A.A. 4.1.2 - Investments in Environmental Protection and Animal Welfare: This intervention supports various investments aimed at improving animal welfare and environmental protection, including: a) Enhancing thermal insulation in animal housing and improving ventilation and temperature control for better animal comfort, b) Transitioning to cage-free systems in poultry farming, and c) prioritising investments that move away from battery-cage systems through scoring criteria.

Assessment of the scheme

The intervention addresses important welfare concerns, such as lameness prevention, air quality improvements, and maintaining tail integrity in pigs. The **requirement to gradually reduce livestock density for dairy cows supports better living conditions and contributes to a reduction of emissions from livestock farming**. The intervention includes actions to monitor hoof health, control rodents, and track air quality, which are essential for long-term animal well-being (e.g. Li et al, 2023). Mandatory biosecurity measures for sheep and goats, including fencing, disease control, and parasite management, **can be expected to contribute to better health outcomes** (Diana et al, 2020).

However, the **financial incentives for adopting welfare measures are relatively low**, particularly for voluntary actions. For dairy cows, four out of five optional welfare measures provide less than €5 per LSU, with only electronic monitoring receiving €21 per LSU. This weakens the incentive for farmers to adopt additional welfare improvements. In addition, the requirement for a 5% or 3% increase in space per cow per year is relatively small and only applies for two years, limiting its long-term impact. Regarding the requirements for pigs, a lack of structural changes to improve their welfare can be noted. While the prescribed actions aim to reduce tail docking, they do not mandate fully enriched environments that prevent tail biting naturally.

Finally, **many of the obligations under this measure relate to monitoring rather than active welfare improvements**. While tracking conditions is necessary, without a structured follow-up system, the effectiveness of these measures remains uncertain.

Recommendations to increase the animal welfare effects of this intervention include:

- Increase space requirements for pigs and dairy cows: Define more substantial increases in space per animal.
- Align with EU Directives on animal welfare: Greater emphasis should be placed on eradicating harmful procedures such as tail docking, a practice prohibited by Council Directive 2008/120/EC laying down minimum standards for the protection of pigs, and providing incentives for farmers to adopt higher welfare alternatives.
- Move from record-keeping to active enforcement: Move beyond simple record-keeping by enforcing compliance with enrichment and space requirements, ensuring that farmers actively implement welfare improvements.

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7.3.3 Italy's eco-scheme for antimicrobial resistance reduction and animal welfare

Context of the scheme

In Italy, only 16.9% of farms kept livestock in 2020, which is the lowest percentage among EU Member States, with the EU average being 44.9%[74]. Interestingly, with a total of 9.3 million total livestock units[75] (LSU)[76], the country had the 5th highest number of LSU in the EUin 2020. The cattle sector accounted for almost half of them, with 4,508,500 LSU, followed by the pig sector with 2,243,500 LSU and poultry, with 1,698,000 LSU[77]. It is noteworthy that, in contrast to the average EU trend, Italy was one of the few EU countries where the rate of decline in farms with livestock (-7.3 %) was considerably lower than that of all farms (-30.1 %)[78].

Within its observation letter addressed to Italy after the submission of its national CAP Strategic Plan for the 2023-2027 period, the European Commission encouraged Italy to act in order **to reduce tail docking practices in the pig sector and the use of confined systems for laying hens, calves and sows** (European Commission, 2022).

In its CAP Strategic Plan, Italy identified several key objectives related to animal welfare. The plan aims to contribute to the objective of **reducing the sales of antimicrobials by 50%, to combat antimicrobial resistance**, an especially pressing issue in Italy compared to other European countries (Italy CSP, 2022). Likewise, Italy aims to phase out cage farming for laying hens through the support of farmers adopting other types of rearing systems. Similarly, one of the objectives of (Italy CSP, 2022) is the promotion of extensive livestock farming, leading to an increase of the minimum living area available per animal.

For the current CAP period, Italy adopted four support schemes related to animal welfare, which include one eco-scheme, two agro-environmental and climate schemes and one investment scheme[79]. The eco-scheme, which will be detailed in the following sections, seeks the reduction of antimicrobial use and animal welfare, notably through the uptake of a national certification scheme. The two agro-environmental and climate

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[74] 2020 data reported by Eurostat, Agri-environmental indicator – livestock patterns, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agri-environmental_indicator_-_livestock_patterns, accessed 19 May 2025

[75] Livestock unit is a reference unit which facilitates the aggregation of livestock from various species and age as per convention, via the use of specific coefficients established initially on the basis of the nutritional or feed requirement of each type of animal.

[76] idem

[77] 2020 data reported by European Commission Agri-food Data Portal, Context Indicator 21, https://agridata.ec.europa.eu/extensions/IndicatorsSectorial/LivestockUnits.html, accessed 19 May 2025.

[78] idem

[79] Catalogue of CAP interventions, accessed 19 may 2025, https://agridata.ec.europa.eu/extensions/DashboardCapPlan/catalogue_interventions.html?page=ByUnitAmount

schemes support 1) the conversion and the maintenance of organic farming, and 2) the promotion of animal health (through joining a health classification system of farms) and the improvement of housing conditions of animals. Finally, the investment pursues several objectives, one of them being animal welfare, which includes investment related to biosecurity, housing conditions, and to adopt the supply of water and feed (Italy CSP, 2022).

Description of the scheme[80]

Italy's eco-scheme targeting antimicrobial resistance reduction and animal welfare (PD-05, ES 1) offers two levels of commitment which farmers can choose to adopt.

The first level aims to reduce the use of antimicrobials in livestock farming. For this, Italy implemented an online platform "classy-farm" that indicates at the regional level, the recommended "Defined Daily Dose" (DDD) for antimicrobials. To be eligible for this payment, farmers must stay below this threshold or reduce the use of antimicrobials by 10% compared to the previous calendar year.

The payment associated with this first level takes the form of an annual payment per livestock unit, with the following rates:

- Dairy cattle EUR 66,0/LSU
- Beef cattle EUR 54,0/LSU
- Dual-purpose cattle EUR 54,0/LSU
- Buffaloes EUR 66,0/LSU
- White meat calves EUR 24,0/LSU
- Pigs EUR 24.0/LSU
- Sheep EUR 60.0/LSU
- Goats EUR 60.0/LSU

Compliance with the first-level requirements is a prerequisite for entering the second level of commitments. However**, for the second level of the eco-scheme, farmers must adhere to the SQNBA system** (which stands for National Quality System for Animal Welfare) and adopt grazing or semi-grazing practices. This second level is available for farmers rearing beef, dairy and dual-purpose cattle, as well as pigs. For

[80] The information used in this section comes from Italy's CAP strategic plan and the catalogue of CAP interventions, which was consulted on 20 May 2025.

each animal category, a list of requirements has been adopted within the framework of the decree from 2nd August 2022[81], within annexes 3, 4, 5, and 6.

Firstly, for each animal category, at least one employee with five years of professional experience should attend a **training on animal welfare and biosecurity**. The training should be repeated every three years. Every farm should be equipped with a separate and comfortable area for sick animals. Temperature, humidity and air quality shall be monitored and kept within safe limits. Additionally, all treatments must be prescribed and monitored by a veterinarian, and antibiotic sensitivity testing is required before using certain antibiotics.

Besides the general requirement, some specific requirements are set out for the different categories of animals covered by the eco-scheme through the adhesion to the SQNBA system.

For fattening pigs reared outdoors or within "semi-free range[82]" systems, the main requirements include:

- The minimum housing area for every pig raised outdoors (>50kg) should be 250m^2.
- A shelter area should be provided for animals, with a minimum size of 0.55 m^2 (51–85 kg), 0.65 m^2 (86–110 kg), or 1 m^2 (>110 kg).
- Tail docking should not be performed on more than 10% of the animals
- Dry bedding should be provided
- The introduction of new animals should be documented.

For beef and dairy cattle kept in stalls (including calves), the main requirements include:

- At least one staff member per 400 animals
- Animal must access feed and water without competition
- All bedding and walking surfaces must be kept clean and dry. The floor shall not be slippery.
- Tethering is prohibited
- Skin lesions shall be monitored and minimised

[81] Decreto interministeriale recante la disciplina del "Sistema di qualità nazionale per il benessere animale" istituito ai sensi dell'articolo 224 bis del decreto-legge 19 maggio 2020, n. 34, introdotto dalla legge di conversione 17 luglio 2020, n. 77, https://sqnba.info/wp-content/uploads/2023/08/MIPAAF_2022_0341750_Decreto_interministeriale_Benessereanimale_signed.pdf

[82] Semi-wild rearing is defined as a free-range method of rearing using fenced, unpaved areas of land, within which the pigs have areas for drinking, feeding and shelter. https://www.reterurale.it/flex/cm/pages/ServeAttachment.php/L/IT/D/6%252F2%252F6%252FD.8396bb279885c4813803/P/BLOB%3AID%3D24834/E/pdf

- Milking rooms and equipment must be clean and sanitised (for dairy cows)
- Regular monitoring for mastitis and other udder issues must be carried out (for dairy cows)

For beef and dairy cattle kept with partial or full access to pasture (including calves), the main requirements include:

- Tethering is prohibited
- Pasture must be at least 500m2/LSU, and natural or artificial shelter must be provided
- In barns, floors must be nonslip and well-maintained
- All animals must be inspected daily, and records should be kept

For beef and dairy cattle kept in small farms (less than 50 heads), the main requirements include:

- Tethering shall not be permanent; if used, animals must have at least 60 days/year being untethered. Calves must not be tethered, even during feeding.
- Either 60 days of pasture per year or free-stall housing shall be provided
- Animals must be inspected twice per day, and records should be kept
- The minimum area should be: $6m^2$ per animal on bedding or cubicles for dairy and suckler cows, $3.5m^2$ per animal on bedding or cubicles for dairy heifers, and 2.5 m^2 per animal up to 400 kg, plus 0.5 m^2 per 100 kg up to 800 kg.
- For at least 60 days/year, all animals must have access either to pasture or to an exercise area (with at least $6m^2$ per animal), allowing them to move freely.
- At least 500 m^2/LSU, with natural or artificial shelter suitable for the season and location
- Calves must be housed in groups between two and eight weeks.

It must be noted that there is a derogation which allows farmers to commit to this second level of the eco-scheme without adhering to the SQNBA system:

- For animals raised under organic farming
- For small herds (less than 20 LSU), which have their grazing commitment controlled by the regional administration.

The payment associated with this second level also takes the form of an annual payment per livestock unit, with the following rates:

- Dairy and dual-purpose cattle EUR 240/LSU
- Beef cattle EUR 240/LSU
- Pigs EUR 300/LSU

Finally, considerable funding has been allocated to this eco-scheme, as the total public expenditure for the 2023-2029 period is EUR 1,826 billion. Likewise, the number of animals targeted by this scheme is high, as 6,5 million animals are expected to be covered by this scheme. It must be noted that a farmer cannot receive a payment for level 1 and level 2 actions for the same animal, in order to avoid double-funding.

Assessment of the scheme

The eco-scheme related to animal welfare requires farmers to adopt a wide set of practices. The first level commitments, aiming to reduce antimicrobial resistance, targets a significant animal welfare problem in Italy (Italy CSP, 2022). The **adoption of a large-scale classification system could contribute to a reduction of antimicrobial use**. Likewise, requiring farmers who do not meet the threshold to reduce their antimicrobial use by 10% annually **offers short-term flexibility to farmers and helps them progress towards the defined targets**. However, a relatively modest annual reduction of 10% may be insufficient to drive transformative change. The requirements of the second level of this eco-scheme may have a positive effect on the use of antimicrobials as all treatments must be prescribed and monitored by a veterinarian, and antibiotic sensitivity testing is required before using certain antibiotics.

Regarding the **second level of the eco-scheme, which requires the adherence of farmers to the SQNBA, it may improve certain aspects of animal welfare** through the support of a wide set of practices. For instance, requiring farmers to monitor the temperature, humidity and air quality and keep them within safe limits is important for ensuring animal welfare (Eurogroup for Animals, 2021). However, considering that there are no precise requirements, it is difficult to estimate to which extent they will improve the welfare of animals.

To comply with the SQNBA standards, **tail docking shall not be performed on more than 10% of the pigs**. According to the legislation, **tail docking as a routine practice is already prohibited**[83], but despite having severe welfare consequences on pigs, it remains a common practice in the EU (D'Eath et al, 2015). It remains to be seen whether the eco-scheme provides sufficient incentives to reduce the prohibited practice of tail docking. Notably, tail docking will continue to be permitted until 2027 if analgesics or anaesthetics are used, which may undermine the potential impact of the scheme on reducing this practice.

Providing grazing opportunities to beef and dairy can improve the welfare of animals (Pe'er et al, 2023). Likewise, **ensuring outdoor access for pigs**, as required

[83] Council Directive 2008/120/EC of 18 December 2008 laying down minimum standards for the protection of pigs, http://data.europa.eu/eli/dir/2008/120/oj

by the SQNBA, **can improve the welfare of pigs** (EFSA, 2022b). However, the **provision of grazing opportunities is not required for all animals** under the SQNBA system, as for instance, for herd below 50 heads, farmers can choose between allocating 60 days of grazing per year or providing free stall housing, while beef and dairy cattle kept in stalls may not have access to pasture, which is contrary to recommendations formulated by EFSA (2023c).

Other practices required from farmers under the second level of this eco-scheme have the potential to improve the welfare of animals, such as cleaning of milking rooms and equipment, which can contribute to a reduction of lameness, mastitis and the stress of animals (Bhilegaonkar et al, 2014), the inspection of animals, especially in regard to mastitis, which is a serious concern to the welfare of dairy cows (Lago & Godden, 2018) as well as the provision of dry bedding (Eurogroup for Animals, 2021).

One shortcoming is that certain requirements do not apply to all animal categories covered by the second-level commitments of the eco-scheme. As already explained, beef and dairy cattle kept in stalls may not have access to pasture. Likewise, contrary to other categories, **animals that are part of a herd smaller than 50 heads can be kept tethered on a non-permanent basis**, which can lead to welfare consequences for cattle animals, notably the reduction of their behaviour repertoire (Eurogroup for Animals, 2021). Moreover, EFSA (2023c) recommends an area of 9 m^2 per cow, which is more than what is required for beef and dairy cattle kept in small farms under this eco-scheme.

Overall, certain practices supported under the SQNBA system have the potential to improve the welfare of animals. In this regard, the **rates associated with the second level of the eco-scheme appear high** when compared to the average rates of schemes related to animal welfare offered by other Member States. These rates could cover, at least partially, the cost generated by the need to comply with the requirements. It must be noted that no data related to the uptake of the eco-scheme were available at the time of writing. However, considering the budget allocated to this eco-scheme and the number of animals targeted, and despite the eco-scheme also supporting sub-optimal investment and practices (e.g. increase of space for cattle in cubicle), it could lead to meaningful improvements of certain animal welfare aspects (e.g. access to grazing, keeping animals untethered), if taken up by a sufficient number of farmers.

Recommendations to increase the animal welfare effects of this intervention include:

- Expand minimum animal welfare requirements to cover all animal categories:

  - Mandate pasture access for all beef and dairy cattle, not only those in partial or full access systems. EFSA (2023c) recommends daily outdoor access.
  - Phase out tethering entirely, including on small farms. The current allowance for "non-permanent" tethering undermines welfare gains.
  - Increase minimum space per animal, aligning with EFSA's recommendation of 9 m^2 per cow instead of 6 m^2, especially on small farms.

- Eliminate options that allow avoidance of high-welfare actions, such as substituting grazing access with exercise areas.
- Align with EU Directives on animal welfare: Greater emphasis should be placed on eradicating harmful procedures such as tail docking, a practice prohibited by Council Directive 2008/120/EC laying down minimum standards for the protection of pigs and providing incentives for farmers to adopt higher welfare alternatives. Only farms with no tail docking (unless medically justified) should be eligible.
- Progressively increase reduction targets for antimicrobials: Level 1 offers a relatively modest reduction target (10% annually). Introduce progressive targets over the CAP period, e.g., a cumulative 30–40% reduction over five years.
- Review and potentially phase out derogations: Current derogations (e.g., for organic farmers and herds under 20 LSU) may allow participation without real improvements. Review derogations periodically to assess whether they are still justified or should be phased out.

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7.3.4 Greece's Investment aid scheme to improve the well-being of production animals

Context of the scheme

The livestock sector is a key component of Greece's agricultural economy, accounting for over 30% of the total agricultural output. Notably, Greece holds a prominent position in goat farming, rearing approximately 25% of the European Union's goat livestock. Goats account for 16.1% of the total Livestock Units (LSU)[84] in Greece, while sheep represent 39.4%, making Greece the only EU country where sheep constitute the largest category of livestock. Pigs contribute 9.2% to the total LSU, cattle 22.9% and poultry 12.5%. Overall, 23.4% of farms in Greece engage in livestock farming[85].

Between 2010 and 2020, while many EU countries reduced their livestock numbers, Greece experienced a 9.0% increase[85]. Despite this rise, the livestock density in Greece is low, namely 0.5, compared to the EU average of 0.8 livestock units per hectare of utilised agricultural area (UAA)[86,87]. While sheep numbers have declined by 21.28% and goats by 33.8% between 2012 and 2021, cattle numbers have been on the increase. Despite these declines, the sheep and goat sector still represents 42% of Greece's total livestock economy (Popescu et al, 2022).

The Greek livestock sector faces several animal welfare challenges: **tail docking of pigs is common**, despite EU legislation prohibiting this practice, 77% of egg production in Greece still utilises cage systems, and the **country is vulnerable to biosecurity challenges, particularly concerning African Swine Fever** (ASF). Finally, the **sales of veterinary antimicrobial agents in Greece shows an upward trend,** in contrast to most EU Member States, potentially increasing the

[84] Livestock unit, a reference unit which facilitates the aggregation of livestock from various species and age as per convention, via the use of specific coefficients established initially on the basis of the nutritional or feed requirement of each type of animal. The reference unit used for the calculation of livestock units (=1 LSU) is the grazing equivalent of one adult dairy cow producing 3 000 kg of milk annually, without additional concentrated foodstuffs.
[85] 2020 data reported by Eurostat, Agri-environmental indicator – livestock patterns, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agri-environmental_indicator_-_livestock_patterns, accessed 02 April 2025.
[86] Utilised agricultural area, the total area taken up by arable land, permanent grassland, permanent crops and kitchen gardens used by the holding, regardless of the type of tenure or of whether it is used as a part of common land.
[87] 2020 data reported by European Commission Agri-food Data Portal, Context Indicator 21, https://agridata.ec.europa.eu/extensions/IndicatorsSectorial/LivestockUnits.html, accessed 02 April 2025.

risk of antimicrobial resistance (AMR) due to the excessive and inappropriate use of antimicrobials (European Commission, 2020).

Description of the measure[88]

The Greek CAP Strategic Plan contains several eco-schemes, agri-environment-climate and investment schemes intended to contribute to animal welfare and the decrease and prevention of antimicrobial resistance (see Box below). An interesting example is the **investment scheme 'to improve the well-being of production animals' (INVEST Π3-73-2.8)** which offers financial support for three sets of actions:

- **Action 1 - System transition for laying hens:** Farmers can receive co-financing for investments facilitating a shift from enriched cages to either floor rearing (barn) or free-grazing systems. Supported investments include the installation of new silos, feed transmission systems, ventilation and cooling systems, lighting systems, and electrical panels. For those transitioning from barn rearing to free grazing, the intervention covers the purchase or rental of additional land, construction of outdoor exits from poultry chambers, and necessary fencing.

- **Action 2 - Improving feeding systems in pig farms**: To enhance the feeding systems in pig farms, this measure supports investments in integrated electronic feeding systems, automatic feeding systems in breast-feeding cells, and systems for supplying milk to piglets. These practices aim to reduce injuries during feeding.

- **Action 3 - Other productive investments to improve welfare on livestock farms:** Under this measure, farmers can receive support for a range of investments to reduce antimicrobial use. An essential eligibility condition for this intervention is that the investments should not result in an increase in production or livestock numbers. Additionally, a welfare improvement report prepared by a veterinarian is required, detailing the investments needed for welfare enhancements. Types of investments supported by this scheme are:

    - Equipment to reduce individual confinement for sows and calves.

[88] The description of the interventions presented in this section is based on information and data provided in the Catalogue of CAP interventions, accessed 02 April 2025.

- Equipment to regulate temperature, humidity, and ventilation in animal housing.
- Replacement of materials to prevent animal injuries.
- Monitoring systems for immediate intervention in case of injury.
- Materials to protect livestock from natural disasters, such as smoke sensors and sprinklers.

The total budget allocated to this scheme is €17.7 million for the period 2023 to 2027, with €15 million coming from the EU budget. Whilst this is a **sizable budget,** it accounts for less than 2% of the total public expenditure on investment aid schemes; it aims to provide financial support to 78 operations annually.

Other interventions of the Greek CSP linked to antimicrobial and animal welfare

Eco-scheme П1-31.7: Environmental management of livestock systems: This intervention focuses on improving the environmental condition of grazing land in areas at risk of desertification due to erosion and land degradation. Farmers in these areas are required to either suspend grazing in degraded areas or relocate herds to mountainous grazing land, which faces reduced accessibility and a heightened fire risk due to poor grazing.

Eco-scheme П1-31.9: Conservation of organic farming and livestock arming: This payment supports farmers maintaining organic farming practices. It is not specifically tied to livestock farming but is available to farmers with livestock holdings under organic regulations.

ENVCLIM П3-70-2.1: Aid for conversion to organic practices (New entrants): This payment supports farmers converting to organic farming. Eligible livestock includes bovine animals over six months old, and sheep and goats over twelve months old. Support is provided per hectare of pasture.

ENVCLIM П3-70-3.1: Welfare of production animals: This intervention covers animal welfare through financial compensation for specific practices, including i) for pigs, regular testing of water quality, providing feed additives for gut health, increasing floor space in sow group housing, and using sensitivity tests to reduce antimicrobial use; and ii) for cattle, expanding space for calves, with specific space requirements based on

weight, and using sensitivity tests to target infections and reduce antimicrobial use.

ENVCLIM П3-70-3.2: Reducing the use of antibiotics in sheep and goat farming: This intervention aims to reduce antibiotic use in sheep and goat farming by promoting vaccination and the use of pesticides. Farmers must vaccinate animals against various diseases and administer endoparasiticides and ectoparasiticides to control parasites.

INVEST П3-73-2.4: Investments in the biosecurity of productive animals: This intervention supports investments in biosecurity measures on livestock holdings, including creating separate facilities for sick or new animals, installing robust perimeters to isolate livestock, establishing a clean zone with clothing and sanitizing areas, cleaning and disinfecting vehicles entering the farm, sealing holes and installing grids in windows, implementing monitoring software for livestock traceability, and installing lighting and nets for free-range poultry.

Assessment of the scheme

The investment scheme supports a range of measures considered as suitable to contribute to a transition to more sustainable livestock farming practices. **Supporting the transition away from caged systems for laying hens** aligns with consumer demand for higher welfare products. **By improving housing and feeding conditions, this use of antibiotics can be expected to decrease**, thus lowering the risk of antimicrobial resistance emerging (EPHA, 2022). The transition to free-range and barn systems can improve manure management and reduce the environmental footprint of poultry farming (Bist et al, 2024).

However, while the measure supports both barn and free-grazing systems, it remains uncertain what proportion of funds will ultimately be put towards free-range systems, which offer the highest welfare benefits. The **individualised pig feeding systems financed by the scheme can prevent competition and ensure better health outcomes** (Georgsson and Svendsen, 2002), but it is not clear how this system will be monitored for compliance with welfare standards rather than productivity goals. Ensuring that investments effectively contribute to welfare improvements requires robust monitoring. A lack of proper oversight could lead to misallocation of funds without achieving significant welfare gains.

Two key gaps are noted: While improvements in ventilation, temperature control, and farm structure are positive, **Greece still faces significant biosecurity risks**, particularly in relation to African Swine Fever and other livestock diseases. **The intervention does not directly address key EU concerns such as the continued practice of pig tail docking**, which remains a serious welfare issue in Greece.

Recommendations to increase the animal welfare effects of this scheme include:

- Prioritise free-range systems: A clearer division of investment between barn and free-grazing systems should be established, ensuring that the transition promotes outdoor access for laying hens.
- Improve transparency in funding allocation: Reporting mechanisms should be strengthened to ensure investments are made with a primary focus on welfare improvements rather than production increases.
- Stronger biosecurity measures: Additional investments in disease prevention and biosecurity should be incorporated to protect against the spread of livestock diseases.
- Align with EU Directives on animal welfare: Greater emphasis should be placed on eradicating harmful procedures such as tail docking, a practice prohibited by Council Directive 2008/120/EC laying down minimum standards for the protection of pigs, and providing incentives for farmers to adopt higher welfare alternatives.

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7.3.5 Finland's agri-environment and climate scheme to support free farrowing in the pig sector

Context of the scheme

The percentage of agricultural holdings keeping livestock in Finland is relatively low compared to the rest of the EU, as, in 2020, only 26% of farms kept livestock in Finland, while the EU average was 45%[89]. Finland also saw its livestock population reduce between 2010 and 2020, with a decrease from 1,121,050 LSU to 950,050 LSU[90]. The highest share of the livestock population in Finland was composed of bovine animals, totalling 594,500, followed by pigs with 212,000 LSU and poultry with 128,000 LSU[91]. All figures are for the year 2020. Overall, the Finnish livestock sector is characterised by a low incidence of animal diseases and minimal use of antimicrobials (Finland CAP Strategic Plan).

The CAP strategic plan of Finland emphasises that special attention is dedicated to animal welfare as evidenced by the **25 schemes related to animal welfare, the highest number of any Member State for the 2023-2029 period**[92]. This may result from the approach adopted by Finland, which, contrary to other Member States, established support schemes specifically tailored for certain welfare consequences, animals or regions. Overall, Finland's support schemes related to animal welfare aim to cover 93.3% of the livestock units for the 2023-2029 period[93].

Within the CAP strategic plan of Finland, seven support schemes specifically target the pig sector, which include measures related to castration, farrowing, housing, monitoring, as well as a plan designed for the welfare of pigs on farm. Beyond the CAP strategic plan, Finland will prohibit the castration of piglets as of 2035. Before that, the use of analgesic medicine is mandatory since 1 January

[89] 2020 data reported by Eurostat, Agri-environmental indicator – livestock patterns, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agri-environmental_indicator_-_livestock_patterns, accessed 05 May 2025.
[90] Main livestock indicators by NUTS 2 region, Eurostat, accessed 05 May 2025, https://ec.europa.eu/eurostat/databrowser/view/ef_lsk_main__custom_16530302/default/table?lang=en
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[92] This represents the number of support schemes linked to R.44 or R.43, according to the catalogue of CAP interventions https://agridata.ec.europa.eu/extensions/DashboardCapPlan/catalogue_interventions.html?page=ByUnitAmount
[93] Result indicators dashboard, European Commission, accessed 06 May 2025, https://agridata.ec.europa.eu/extensions/DashboardCapPlan/result_indicators.html

2024, and the use of local anaesthetics will be from 1 January 2027 (Finland CAP Strategic Plan).

Description of the scheme[94]

Among the seven support schemes dedicated to the welfare of pigs adopted by Finland, **one supports free farrowing, or birthing, practices**. Common practices related to farrowing, notably the use of farrowing crates, can generate adverse welfare consequences for the sow (e.g. restriction of movement, increased stress). Therefore, the measure related to environment and climate "EHK 08" adopted by Finland, aims to ensure the absence of welfare consequences for the sow during the farrowing and the lactation period. For this purpose, farmers must meet the following requirements to receive payments:

- Ensure that sows/gilts are able to move freely, before, during and after the farrowing period. The movement of the gilt/sow may be restricted only in exceptional cases and temporarily. Such restrictions, when adopted, must be recorded by farmers.
- In case there is a pen, it must have a solid bottom as well as sufficient and suitable material for nesting, stowing and bedding.
- Flexible and movable nesting material should be continuously available until farrowing. Enrichment material and litter must be present at all times.
- In the pen, the gilt/sow must be able to turn around unhindered. The pen must have a minimum turning diameter of 170cm. The area of the farrowing pen shall be at least 7m^2.
- Piglets shall have at least 1 m2 space in which pen structures protect the piglets from falling under the sow.

The payment rate associated with these requirements is 555€/LSU/year. This payment intends to compensate for the additional costs and income foregone resulting from the adoption of free-farrowing practices. This scheme will be implemented for the years between 2024 and 2028, for a total public expenditure, i.e. EU funding and co-financing by the Member State, of EUR 21 million. The number of livestock units planned to be covered by this intervention will increase yearly by 1.000 LSU with a target of 6.000 LSU set for 2024 and 10.000 LSU by the year 2028.

[94] The information used in this section comes from Finland CAP strategic plan and the catalogue of CAP interventions, which was consulted on 05 May 2025.

Other support scheme related to farrowing adopted by Finland

Improved farrowing conditions (EHK 09): Alongside this support scheme, Finland adopted another scheme related to farrowing, but instead of supporting "free farrowing", it supports "improved farrowing conditions" for farmers who still use farrowing crates. It must be noted that this support scheme is not accessible to farmers who already received payments under the free-farrowing scheme. The support scheme related to improved farrowing requires farmers to ensure that the sow is moved to the farrowing cage only two days before giving birth, and that she spends a maximum of three days in the cage afterwards. However, the sow may stay in this cage for up to seven days if she is aggressive, restless or there are other acceptable reasons to keep her in a cage. Additionally, the cage shall be at least 6m2 in size and the piglets shall have at least 1 m2 of space in which the pen structures protect the piglets from falling under the sow. The rate for this support scheme is 445€/LSU/year, while the budget and the number of LSU targeted are slightly lower than for the free farrowing scheme.

Assessment of the scheme

For the pig sector, an important concern is the **use of farrowing crates, which cause movement restrictions and increase stress and frustration** (Humane Society International/UK, 2024). Currently, between 86 and 95% of sows in the EU are still confined in farrowing crates during the lactation period (Malak-Rawlikowska et al, 2024). As a result, EFSA recommends that, for animal welfare reasons, periparturient and lactating sows should not be housed in farrowing crates but in farrowing pens (EFSA, 2022b).

Therefore, Finland's free farrowing support scheme directly addresses this widespread and problematic practice, which has significant negative welfare implications. By promoting free-farrowing systems, the measure pursues a highly relevant and impactful animal welfare objective. The requirements that must be adopted by farmers **ensure the free movement of the sow and an environment which does not cause any suffering to the sow and the piglets and enable natural behaviour** (e.g. nesting, stowing), thanks to the provision of enrichment material, which can improve the welfare of sows (Mkwanazi et al, 2019). Likewise, requiring farmers to have a **minimum space where piglets can be protected from the sow aims to reduce the crushing of piglets by the sow**, which is an important concern in pig farming (Weary, 1998). Overall, free

farrowing practices supported by this scheme have the potential to improve the welfare of sows, notably as it allows greater freedom of movement for sows (Kinane, 2022)

Compared to other CAP support schemes related to animal welfare adopted across the EU, this scheme's **payment rates can be considered as high** (555€/LSU/year). Setting adequate payment levels is necessary, due to the additional cost that can be incurred by free-farrowing practices, as for instance, farmers might need to invest in farrowing pens. Cost of a farrowing pen will vary, depending on several factors, but are estimated to be in the range of EUR 5,000 and EUR 6,000 in France, according to (IFIP, 2022). According to industry estimates, the cost of free farrowing pens ranges from EUR 6,524 to EUR 7,118 per sow, depending on the level of equipment, compared with EUR 4,152 to EUR 4,745 for pens with 'traditional' farrowing crates (Pig world, 2021). Given these estimates, the scheme, which provides annual payments, might be complemented by an investment scheme to help farmers cover some of the costs of setting up free farrowing pens.

While it remains uncertain to what extent the rates would cover the additional costs associated with free farrowing, the support scheme adopted by Finland promotes relevant practices and can improve the welfare of pigs in a significant way.

Recommendations to increase the animal welfare effects of this scheme include:

- Limit parallel support: Gradually reduce support for "improved" crate-based systems (EHK 09) to avoid incentivising only marginal changes.
- Complement with investment support: Establish or scale up targeted investment aid to cover the upfront cost of converting facilities to free-farrowing pens, especially for smaller or mid-sized farms.
- Review and adjust payment rates: Monitor the actual cost gap between free and crate-based systems, and review payment levels regularly to ensure they remain attractive.
- Strengthen technical support and peer-to-peer learning: Expand advisory services to help farmers adopt free-farrowing systems successfully and manage challenges such as piglet mortality or sow aggression. In addition, facilitate peer-learning to share best practices and encourage uptake.
- Increase scheme ambition and scale: Raise annual uptake targets to exceed the 10,000 LSU planned by 2028, aiming for broader sector-wide transformation.

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