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**FEFAC comments on the call for evidence for an impact assessment on
“On-farm animal welfare for certain animals: modernisation of EU legislation”**

FEFAC representing the EU manufacturers of feed for food producing animals considers that the Call for Evidence provides a good overview of the current challenges related to animal welfare, i.e. striking the right balance between social expectations without jeopardising the economic viability of EU livestock farms.

We would like to emphasise the importance of securing a sound scientific basis to any additional legal requirements while reminding also that the suitability of such requirements should be carefully weighed against possible adverse effects on e.g. animal health. In this sense, it should be stressed that biosecurity in free-range systems is a lot more complicated to secure and may expose animals to a higher risk of disease transmission from wild animals.

FEFAC also supports the development of robust indicators to monitor animal welfare status, while ensuring that these indicators can be effectively implemented on the farm without increasing administrative burden.

FEFAC would like also to remind the importance of adequate nutrition, which is more than just meeting basic animal needs. There is an increasing body of evidence that animal feeding practices may significantly improve the welfare of animals, for example in helping digestion via specific formulation for diet transitions or use of digestibility enhancers or in helping consolidation of bones to limit the risk of fracture.

Regarding the selection of the first sectors for which species-specific rules will be established, FEFAC is of the opinion that priority should be granted to sectors for which no such specific rules have been set yet, while making sure that the body of scientific evidence is sufficient to justify regulatory options.

Finally, we support the idea to investigate in the question of equivalence of EU welfare standards for imports of animals and animal products from third countries.