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Revision of the BREF Intensive Rearing of pigs and poultry
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Subject : Split view assessment

Ergersheim, 24 April 2015

Dear Kostas and German,

you have sent your split view assessment on 18th February.

You have concluded to report in the Concluding remarks the split view of EEB on fully slatted floor (FSF), supported by several member states, only for fattening pigs and weaners, but not for mating, gestating and farrowing sows.

We think that it is still worthwhile and necessary to have a new look on this issue.

In fact we are severely disappointed and disillusioned by this assessment which must still be reversible. It appears to be based on:

- misunderstanding of the Directive concerning floors for sows
- inadequate evaluation of current difficulties concerning FSF and enrichment
- excessive optimism concerning the capacity of FSF to adapt to appropriate enrichment obligations
- undue distinction between animal categories – the problem is fundamentally the same for all categories of pigs, for behavioural needs as well as for slurry evacuation
- misunderstanding of thermal comfort (which is mandatory)
- omission of physical comfort (which is mandatory)
- ignorance of specific and major needs of sows :
 - o to have an insulated and deformable resting area, in order to enable them to adopt a natural position for lying and maintain their skin temperature
 - o prevent claw lesions
 - o to have litter, particularly for mating and/or regrouped sows, in order to alleviate nervousness and aggression during this period
 - o for high fibre forage and expression of feeding behaviour, as sows normally have rationed food and are stressed. Straw is an optimal solution, FSF is incompatible.

You find more detailed remarks in Annex.

For all these reasons we urge you to report in the concluding remarks our dissenting view that housing systems with fully slatted floors should not be applicable to new plants for all categories of pigs, including mating, gestating and farrowing sows.

We believe that you will do your best.

Kind regards,

Anne Vonesch

ANNEX

BREF Intensive Rearing of Pigs and Poultry Remarks from European Environmental Bureau concerning the Split View Assessment by EIPPCB (18.2.2015)

EEB urges the EIPPCB to modify its conclusions on ***Fully slatted floor is not applicable to new plants and to report this split view for all categories of pigs including mating, gestating and farrowing sows, not only fattening pigs and weaners.***

In summary, the arguments developed in your assessment (pages 14-15) are imperfect:

- misunderstanding of the Directive concerning floors for sows
- inadequate evaluation of current difficulties concerning FSF and enrichment
- excessive optimism concerning the capacity of FSF to adapt to appropriate enrichment obligations
- undue distinction between animal categories – the problem is fundamentally the same for all categories of pigs, for behavioural needs as well as for slurry evacuation
- misunderstanding of thermal comfort (which is mandatory)
- omission of physical comfort (which is mandatory)
- major need specifically for sows to have solid floor and an insulated and deformable resting area, in order to enable them to adopt a natural position for lying
- major need for mating and/or regrouped sows to have litter, in order to alleviate nervousness and aggression during this period

In more details, our remarks on your EIPPCB assessment are the following (page 14-15) :

- *(1) PSF are included in the list of BAT.*
You are saying that FSF is only applicable for new houses with an additional mitigation measure. If you suggest that FSF is by itself a mitigation measure but that an additional one is needed :
 - you are wrong because FSF by itself is not a mitigation measure
 - you are right because a (real) mitigation measure is needed.➔ Your assessment is based on some confusion.
- *(2) FSF are not forbidden*
This is true. But up to now farms with FSF have been unable to comply with the requirements regarding appropriate enrichment which have been in force since 2003.
➔ there is no reason to promote FSF.
- *(3) In the scope of the BAT Conclusions ... without prejudice to other relevant legislation, e.g. on animal welfare.*
The EIPPCB should look at reality. It makes no sense to copy-paste “without prejudice”.
➔ the immense prejudice entailed by FSF is evident as these floors make it very difficult, almost impossible, to comply with the enrichment requirements of Directive 2008/120.

- (4) According to [495, EFSA, 2007], the largest risk for pigs ...

This is true. So you admit what EFSA says.

➔ there is a major difficulty to provide appropriate enrichment material with FSF.

- (5) For mating and gestating sows the applicability restriction...

This is incomprehensible. Already at the meeting the discussions about this were very confused.

At the meeting you refused to quote the enrichment obligation as an applicability restriction to FSF. Why do you accept this quotation as an applicability restriction ?

What argument do you have to assume that a maximum of 15 % of the resting surface being reserved for drainage openings ensures provision of adequate manipulable material ? NONE !

It is FSF, nothing else. For all pigs under Article 3.2(b) of Directive 2008/120 the drainage openings for concrete slatted floor are limited to a maximum of 22 % (piglets), 28 % (weaners), 22,5 % (fattening pigs) and 25 % (sows), in order to achieve a compromise between slurry evacuation and claw lesions (but there is no limitation for metal or plastic slats !). For the resting area (1,3 m²) for pregnant sows the upper limit of openings is 15 %. Whether you have 25 % or 15 % of drainage makes NO SIGNIFICANT DIFFERENCE for the evacuation of manipulable material in a slurry system. It is FSF. Appropriate manipulable material seems extremely rare.¹

The difference occurs when the lying area is made of solid floor (some may have 2-3 % of openings for drainage of urine), which makes it easier to provide appropriate enrichment (e.g. some straw in Denmark). A solid floor for the resting area of sows is current practice (or mandatory) in several countries. So many people don't even realise that FSF remains legal for sows on a European level.

So all the difference you introduce, concerning our split view, between fattening pigs and sows are based on misunderstanding the 2008/120 directive which says that for sows there must be a part of solid floor with no more than 15 % of drainage. Yes, this means: **a fully slatted solid floor**. It is nonsense. It also means : FSF is not forbidden (producers don't want to innovate), although we all know perfectly well that FSF is not comfortable for sows and makes it very difficult to provide appropriate enrichment.

We have another eloquent example of such inherent derogation within directive 2008/120/CE : the nesting material : it must be provided, unless the slurry system does not allow it. This means: nesting material is necessary for sows, but producers are reluctant to innovate.

➔ **the idea that the applicability restriction ensures adequate manipulable material for pregnant sows is a misunderstanding.**

- (6) However, small quantities of straw from racks ...

This is partially right. Straw racks are a solution for slatted floors.

According to <https://euwelnetpigtraining.org/Pages/9> they are less effective than litter, because the material is not rootable. Also, it is difficult to guarantee permanent and sufficient access for all animals. But it is a valuable compromise for existing installations. It is very useful for transition towards better systems. It is not an optimal solution for new installations.

¹[http://www.bretagne.synagri.com/ca1/PJ.nsf/TECHPJPARCLEF/20455/\\$File/20130222_Jouets_Caille.pdf?OpenElement](http://www.bretagne.synagri.com/ca1/PJ.nsf/TECHPJPARCLEF/20455/$File/20130222_Jouets_Caille.pdf?OpenElement)

“problems in the slurry can be avoided with careful management”. There are indeed publications and experiences in favour of management of small amounts of straw within liquid slurry systems. However, the risk is to provide extremely small quantities, such as 5 or 10 or 30gr of straw per pig per day, which is ridiculous.

What means *“careful management”*? Reduce the quantity of straw? Manual cleaning? Modify the slurry evacuation system? No doubt, there are solutions.

The fact is that professionals, competent authorities and experts, as far as France (and others) is concerned, continue to affirm that straw (and similar materials) and FSF are not compatible:

- In France, the competent authority Direction Générale de l’Alimentation (DGAL), in a letter from 2 March 2015, writes : *« Il est reconnu que la paille est les autres types de litières (foin, compost...) constitue le matériau idéal, or c’est incompatible avec les systèmes d’élevage sur caillebotis (conséquences sur les voies d’évacuation des effluents qui se bouchent). »* [it is acknowledged that straw and other types of litter (hay, compost...) are the ideal material, but it is incompatible with the systems on slatted floor (consequences on the evacuation channels which get blocked)]
- The DGAL has requested an expert opinion from the Agence Nationale de Sécurité Sanitaire, Alimentation, Environnement (ANSES).
The [opinion of ANSES](#) explains on page 10-12 why FSF and straw are incompatible. DGAL is in favour of further research to find and develop appropriate objects, other than straw, for effective manipulation on FSF. This is the situation after more than 10 years of directive 2008/120/CE ! FSF has failed.

Even if innovating technical solutions for slurry evacuation can be developed – which will take time -, the problem of claw lesions, bursitis, physical and thermal discomfort, remains as before on FSF.

- ➔ It makes no sense to declare BAT a floor type which today has failed on welfare (and which by itself brings no advantage for environment), on the basis of eventual future potential of adequate solutions for manipulable material, whereas physical integrity and physical and thermal comfort remain problematic.
- (7) *In a scientific opinion by EFSA... it is stated that ‘nesting material ...*
It is not very helpful to state that new plants for farrowing sows with FSF *“can”* be built in a way to handle straw. Maybe, hopefully, they can (maybe straw in Sweden or some jute tissue in Germany). In fact, almost all European sows don’t have any nesting material because of FSF. And new plants would be MUCH BETTER with straw and free farrowing (which is essential). . To declare the FSF systems BAT is simply unacceptable as the likelihood is that farrowing sows will continue not be given nesting material despite the clear scientific evidence that this is extremely important for them.
 - ➔ So the minimum to achieve BAT- compatible practice would be to include the provision of sufficient adequate nesting material as an applicability condition for BAT.

- (8) *The thermal comfort...*

It is true that FSF can have a cooling effect, but thermal comfort is not limited to warm periods. Good systems offer the pigs some choice between different climatic conditions. Pigs show individual differences in thermal comfort needs. FSF cannot offer the necessary choice for thermal comfort.

Physical comfort (which is mandatory) supposes a deformable floor.

There are several specific issues for sows :

- Sows are very sensitive to colder, non-insulated floor (their skin is at 28°); when the floor is colder and not insulated, they lay on their belly with legs folded instead of laying on their side with their legs stretched², and this fosters lesions and stress³. This problem is even more important for sows than for fattening pigs. Sows have a high need for insulated floor.
➔ Insulated and deformable floor cannot be FSF.
- Sows live longer than fattening pigs. They have higher risk of lameness and disease. They interact in groups. They (mainly sows with small feet) risk having their claws caught in the slats which causes lesions and infections. The authorized slat width of 20 mm is in fact too large and causes claw lesions. Even 17 mm are too large.⁴
➔ sows need solid floor.
- When sows are regrouped or mixed and when they are mating, they are nervous and they may struggle for ranking order. If they have space, structure and plenty of manipulable material, they are much calmer, fight less and have fewer lesions. There is a special management technique: let them live in an “arena” with much space and litter during that critical period⁵. The best is to leave them permanently in this type of favourable environment.
- Sows in the current intensive system live under high stress. They receive concentrated and rationed feed, and their natural exploration and feeding behaviour is highly frustrated. This leads to behaviour disorders. The mortality of sows has significantly increased during the last years (15 % in Denmark)⁶. The provision of sufficient good straw and other forage with high fibre content is optimal for their health and welfare. FSF is not compatible with fulfilling these needs.
- Future farrowing must be free farrowing, without cages. FSF is not compatible, because slat width for sows and for piglets is not the same.

➔ **These are additional reasons why FSF cannot be BAT especially for sows.**

Our conclusion is that FSF cannot be BAT for all categories of pigs, including all categories of sows.

² [http://www.bretagne.synagri.com/ca1/PJ.nsf/TECHPJPARCLEF/18828/\\$File/12%20pages%20Etat%20des%20pattes%2009-2012.pdf?OpenElement](http://www.bretagne.synagri.com/ca1/PJ.nsf/TECHPJPARCLEF/18828/$File/12%20pages%20Etat%20des%20pattes%2009-2012.pdf?OpenElement)

³ Rudolf Wiedmann : Gruppenhaltung tragender Sauen page 89

⁴ ibid page 86

⁵ ibid. page 18-27

⁶ ibid. page 38

The problem of FSF in this BREF is a fundamental one.

Fully slatted floor or any floor type should never have been mentioned as a BAT because it has NO PERFORMANCE BY ITSELF to reduce emissions. This has been a fundamental error from the very beginning. **All the effective mitigation of emission is performed by associated techniques,** which can be applied with diverse floor types and with a large variety of floor design.

The BAT assessment should target the effective mitigation techniques. Only these techniques must be listed as BAT. The BAT assessment should not induce confusion with other housing aspects which are not relevant for mitigation of emissions.

There was absolutely NO NEED and there is NO ENVIRONMENTAL OR OTHER BENEFIT to declare FSF as BAT.

If the European Commission declares FSF as BAT, it sends a WRONG signal to producers and industry, encourages BAD CHOICES for investment, takes a major RISK for the image of pork production, and improves NOTHING for environment, and is in CONTRADICTION with its own legislation and strategy on animal welfare.