



29 January 2024

Please reply to:

Commissioner Stella Kyriakides  
European Commission  
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Dear Commissioner

### The routine tail docking of pigs

It is now 30 years since the EU ban on routine tail docking of pigs and the Directive's requirement for pigs to be given effective enrichment materials came into force.

Commission audit reports show that in many Member States the vast majority of pigs are tail docked. Moreover, in many farms pigs are not provided with effective enrichment; they are simply given a metal chain and/or some plastic objects.

In its 2022 Scientific Opinion on the welfare of pigs EFSA concluded that tail docking "is not necessary if husbandry practices and management are appropriate" and recommended that "tail docking should not be performed." EFSA identified the following factors as important to prevent tail biting: the provision of enrichment materials such as straw, increased space allowance, and low levels of ammonia.

In addition, EFSA recommended that "All pigs should be provided with effective enrichment". EFSA concluded that:

- "it is 90–100% certain that straw, hay, silage or other loose organic substrates are more effective in reducing tail biting than enrichment materials which are suspended from a ceiling or fixed to a wall.
- it is 66–100% certain that a reduction in tail biting can be achieved in undocked pigs if they are offered 20 g per day of straw or similar substrate. However, quantities that are larger (e.g. up to 400 g/pig per day) are more effective.
- it is 66–100% certain that the effects of tail biting outbreaks can be mitigated by using attractive organic substrates."

We recognise that the Commission has taken important initiatives in recent years such as the publication of the 2016 Recommendation and the requirement for Member States to

produce national action plans for the prevention of routine tail docking. Nonetheless, non-compliance with the legislation remains widespread.

We urge the Commission to take new steps to address the routine non-compliance with the law by the EU pig sector and the failure of many Member States to enforce the law. Infringement proceedings should be brought against the Member States with poor records in this area.

We recognise that some of the factors that contribute to tail biting may sometimes not be easy for inspectors to detect, for example whether the pigs' diet and health status are sufficient. And in some cases the situation may be borderline.

However, in many cases breaches will be blatant and obvious, for example where there is no enrichment or just the provision of chains and/or plastic objects. In such cases the farmer is in breach of the Directive's requirements on both enrichment and tail docking and the Member States must take action to remedy the situation and prevent recurrence by imposing penalties that are effective and dissuasive.

We would be grateful for a meeting with you or your officials to discuss how this important legislation can finally be enforced and respected.

Yours sincerely

ALAW (UK Centre for Animal Law), Paula Sparks, Chair

Animal Law Italia ETS, Alessandro Ricciuti, President

Association for the Ethical Treatment of People and Animals in Bosnia and Herzegovina, Alma Ljubica Kovacevic, President

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Dyrenes Beskyttelse/Animal Protection Denmark, Britta Riis, Director

Ethical Farming Ireland, Caroline Rowley, Director

Eurogroup for Animals, Ines Grenho Ajuda, Programme Leader for Farm Animal Welfare

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