

EUROPEAN CITIZENS' INITIATIVE 'END THE SLAUGHTER AGE'



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Preface

The supranational organization **End the Slaughter Age** (ETSA) plans to launch a synonymous plan to be proposed to the European Commission (the Commission) through the creation of a petition, thanks to the right to the European citizens' initiative (ECI) to create new legislation with the objective of facilitating the transition from products obtained from breeding, slaughtering and hunting to cruelty-free products such as those that are plant-based and produced using cellular agriculture, acellular agriculture (from fermentation), cellular aquaculture and similar technologies.

End the Slaughter Age

CONTEXT

HUMAN RIGHTS

The terrible conditions, including those that are legal, where the majority of employees in the livestock sector are forced to work have been widely documented by many organizations to date.

According to investigations by *Essere Animali*, for example, there are more than 21 thousand people working in this sector in Italy alone. Over half of the workforce in slaughterhouses and a quarter of those employed in meat processing are migrant workers coming from eastern Europe, the Balkans, from northern and central Africa and from eastern Asia. People who, in the majority of cases, would prefer a different job but who have no other alternative.¹

In the production of chicken meat, irregular practices are the order of the day, including: workers who have no contracts, the absence of training courses for operators who do not have adequate protective equipment available.²

EU-funded research which also partly analyzes the Italian pork sector shows that many of the cooperatives in this industry are fraudulently set up by companies wishing to exploit precarious and flexible labor, in addition to the tax incentives derived from this.³

Employees in intensive livestock farms are exposed to countless occupational hazards, including injury, respiratory disease, PTSD, and exposure to antibiotic-resistant bacteria. In fact, a recent issue of the journal *Occupational and Environmental Medicine* found potentially lethal bacteria in 10 out of 22 workers who were tested.⁴⁵

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https://www.essereanimali.org/2021/10/industria-della-carne-italiana-sfruttamento-lavoro/?fbclid=IwAR_0krcUpAuHSBowZZdTikEl6Pi5iDDGTm-wWxS339Csfm3b4fi4ralWB9F4

2

<https://www.essereanimali.org/violento-carico-dei-polli/>

3

https://www.francoangeli.it/Ricerca/scheda_libro.aspx?id=26382

4

https://www.nytimes.com/2014/09/16/science/study-finds-pork-workers-retain-bacteria-for-days.html?mc=edit_tnt_20140915&nliid=657398w25&ntemail0=y&r=2

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<https://oem.bmj.com/content/72/2/90>

ANIMAL RIGHTS

In relation to the protection of animals, the EFSA website states that *‘animal welfare plays an increasingly predominant role in the EFSA mandate’* and that *‘the wellbeing of animals intended to be used in food production depends greatly on how they are handled by people.’*

It also states that *‘sources of stress and conditions of poor wellbeing may result in animals becoming more susceptible to communicable diseases, which may pose a risk to consumers.’*

Considering what has been written, namely how much importance the European Union places on animal welfare, also from the perspective of disease prevention and, indeed, pandemics, it seems evident how the introduction of cultured meat onto the market - requiring fewer resources than traditional meat - will have a lower cost over time than traditional meat, especially where there is a shortage of subsidies unnecessarily propping it up. And this also without counting any subsidies for ethical and ecological alternatives that we are requesting in the ECI.

This will force the animal industry into a race to the bottom with emerging sectors, which will inevitably translate into increasingly inhumane conditions for farm animals.

Therefore, given that the Lisbon Treaty of 2009 explicitly recognized animals as sentient beings and that the EU and its member states have the responsibility, from an ethical perspective, to prevent mistreatment, pain and suffering, the only consistent solution is to permanently end farming forever.

Once the price for cellular agriculture and plant-based products reaches a level lower than that of traditional animal produce, it seems evident that leaving a product on the market that causes so much pollution is not just pointless, but also harmful, and contrary to the European Union’s sustainability policies.

The two emerging sectors can produce meat, milk, eggs, fish, leather, fur and practically any other organic product with market demand that has been obtained to date through the use of cruel and environmentally harmful methods that we know all about. Therefore, any form of farming (and obviously of slaughtering) will by now be obsolete and exclusively harmful.

There are also no issues concerning restrictions resulting from religious freedom, as several Muslim and Jewish scholars have declared that these new products obtained using cellular agriculture can be considered halal and kosher in every respect.

Article 13 of the Title II of the TFEU states that: *‘Union and member states have taken full account of the needs of animals with regard to their welfare as sentient beings.’*

According to special Eurobarometer data from May 2021 concerning the opinions of European citizens on the subject of animal welfare, 82% stated that the wellbeing of farm animals should be better protected than it is at present.⁶

Once the alternative cultured meat reaches the European market, it seems obvious that there will no longer be any legal or moral justification for farming, as it clearly contradicts EU regulations concerning animal welfare, namely the ‘five freedoms’:

- *Freedom from hunger and thirst*
- *Freedom from discomfort*
- *Freedom from pain, injury and disease*
- *Freedom express normal behavior*
- *Freedom from fear or distress*

Freedom from hunger and thirst: all animals arrive at the slaughterhouse hungry and thirsty.

Freedom from discomfort: farming is one of the main reasons for the extinction of some species.

Freedom from pain, injury and disease: slaughtering, even through stunning, is certainly painful, and danger of antibiotic resistance is making us aware of the level of the health of farm animals.

Freedom to express normal behavior: there is no ethological behavior on a farm, an artificial environment created by humans for the purpose of generating and slaughtering sentient animals

Freedom from fear and distress: farm animals are continually subjected to fear and distress, from the moment of their birth until their death.

PUBLIC HEALTH

According to the United Nations’ Preventing the Next Pandemic’ report⁷, ‘the increase in human demand for animal proteins’ and ‘the intensification of unsustainable agriculture’ are two of the largest drivers behind livestock disease.

Plant-based and cultured meat do not lead to any risk of causing a pandemic because they are produced without breeding animals.

Additionally, whereas industrial animal farming is leading us towards a public health crisis, plant-based and cultivated meat production does not contain antibiotics and contaminants. These sustainable proteins can help prevent the end of modern medicine.

⁶ https://data.europa.eu/data/datasets/s2096_84_4_442_eng?locale=en

⁷ <https://news.un.org/en/story/2020/07/1067711>

CLIMATE CHANGE

The consumption of meat and other animal derivatives is literally killing the planet.⁸

Products obtained through cellular agriculture, on the other hand, have a much lower environmental impact than those obtained using traditional methods. For example, according to studies by researchers in Oxford and Amsterdam, the production of cultured meat would emit 4% of greenhouse gases compared to 18% from the direct emissions and 51% if we also include indirect emissions from meat obtained from slaughtering.⁹ Cultured meat would reduce energy consumption for meat production by 45%, requiring only 2% of all ground used today for the farming industry. Additionally, for every hectare used for the production of cultured meat, between 10 and 20 hectares could be freed up.¹⁰ These freed-up hectares could be used for reforestation, one of the best ways to combat global warming through CO₂ storage. Lastly, by returning so much soil back to its virgin state, a large number of wild animals would be saved.¹¹ With regards to plant-based products, as with plant-based meat, the benefits with regard to sustainability, are equally clear. For example, let's take one of the most famous brands that is most similar to beef in terms of nutritional value and characteristics, Beyond Meat. According to a study by the Center for Sustainable Systems at the University of Michigan, the Beyond Burger generates 90% less greenhouse gas emissions, requires 46% less non-renewable energy, its impact on water resources is reduced by 99% **and by 93% on the use of soil** in comparison to the same quantity of cattle meat.¹²

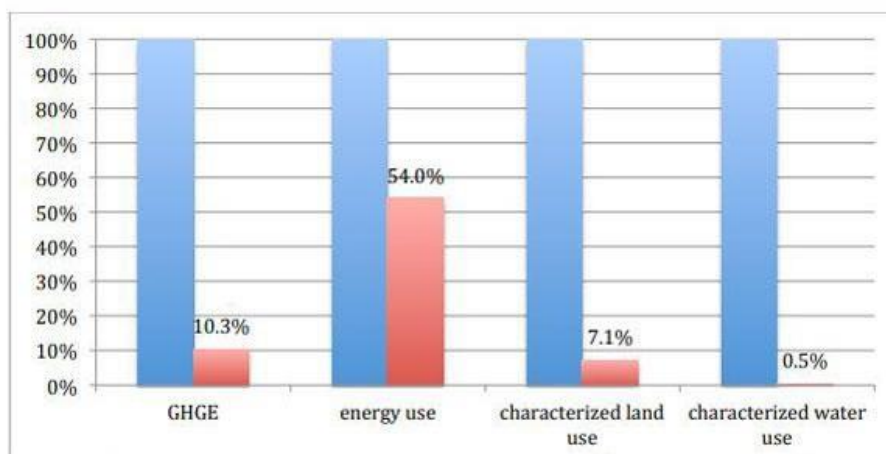


Figure 6. Relative comparison of impacts between beef (blue bars, set at 100% for each indicator) and Beyond Burger (red bars).

⁸ "How Eating Less Meat Could Help Protect the Planet From Climate Change". *Time*. Retrieved 5 December 2019.

⁹ WorldWatch Institute, *Livestock and Climate Change - What if the key actors in climate change are... cows, pigs, and chickens?* Archived on 17 April 2017 in *Internet Archive*, November/December 2009.

¹⁰ *A Farm on Every Floor*, *The New York Times*, 23 August 2009

¹¹ *World's first lab-grown steak is made from beef but slaughter-free*, on *dezeen.com*, 18 December 2018.

¹² <https://css.umich.edu/sites/default/files/publication/CSS18-10.pdf>

DEMANDS

In light of the above, European citizens are asking the European Commission to facilitate access to these sustainable products in the following ways:

- 1 - The exclusion of animal husbandry from activities eligible for agricultural subsidies and the inclusion of ethical and eco-friendly alternatives, such as cellular agriculture and plant proteins;
- 2 - Incentives for the production and sale of vegetable-based products and those generated through cellular agriculture;

1 - The exclusion of animal husbandry from activities eligible for agricultural subsidies and the inclusion of eco-friendly alternatives, such as cellular agriculture and plant proteins;

European Union environmental policy is founded on the principles of caution, preventive action and correcting the sources of damage caused by pollution, in addition to the principle of 'who pollutes pays'.¹³ The 'who pollutes pays' principle is implemented by the directive concerning environmental responsibility, which is aimed at preventing or otherwise repairing environmental damage to species and protected natural habitats, to water, and to soil.¹⁴

In light of the fact that the livestock industry is one of the leading causes of pollution and can be replaced with cellular agriculture and vegetable surrogates, it seems evident that the concept of continuing to provide subsidies to this sector clearly contradicts the principles of sustainability on which the European Union is founded.

The livestock industry is not required to pay for all the damage caused by global warming, deforestation, water pollution, etc. European institutions can take decisions elsewhere, but it must at least avoid continuing to maintain a sector which is extremely destructive for the health of the planet, for the health of animals, and the health of people.

There are now alternatives that can provide the same protein intake and flavor with a much lower environmental impact. So the European Union is being asked to exclude livestock farming from the activities that are eligible for agricultural subsidies and instead include and broadly support environmentally-friendly, healthy and humane alternatives for animals and people.

¹³ Articles 11 and 191 to 193 of the Treaty on the Functioning of the European Union (TFEU).

¹⁴ <https://eur-lex.europa.eu/legal-content/IT/ALL/?uri=CELEX%3A32004L0035>

2 - Incentives for the production and sale of vegetable-based products and those generated using cellular agriculture;

The recent '[MeatAtlas 2021](#)' report funded by the European Commission observes that *'the five giants of meat and milk, JBS, Tyson, Cargill, Dairy Farmers of America and Fonterra alone generate more emissions per year than major oil producers such as Exxon, Shell or BP'*.¹⁵

For this reason it seems evident that vegetable surrogates and cellular agriculture would have to be supported in order to discourage animal products. Unfortunately, this is not happening. On the contrary, it is often the opposite that occurs.

The Italian case is emblematic, for example, where cow's milk is subject to 4% tax, whereas plant-based milk is subject to 22%. A 450 percent difference in taxation. We are requesting that the European Union intervene in these serious disparities that are in contrast with European environmental policies, and to reverse this course, forcing member states to not just reduce taxation for these products, but also to apply subsidies to those sectors that are the most environmentally-friendly.

a) Does the initiative/proposal falls under the EU's political competence?

So-called 'cultured meat' is already regulated within the EU to some extent. Food consisting of, isolated from, or produced from cultures of cells or tissues derived from animals, plants, microorganisms, fungi or algae fall within the scope of Regulation (EU) no. 2015/2283¹⁶ concerning novel foods.

This requires that they are first authorized to be released on to the market, except when the technique used is covered by the scope of application of Regulation (EC) no. 1829/2003¹⁷ concerning genetically modified foods and animal feed, in which case the latter applies.

¹⁵ https://eu.boell.org/sites/default/files/2021-09/MeatAtlas2021_final_web.pdf?dimension1=ecology

¹⁶ Regulation (EU) 2015/2283 of 25 November 2015 on novel foods. Official Journal L327 of 11.12.2015 pg.1

¹⁷ Regulation (EC) no. 1829/2003 of the European Parliament and the Council of 22 September 2003, relating to genetically modified food and animal feed. Official Journal L.268 of 18.10.2003, pg. 1

Since cultured meat is a foodstuff, it is also subject to the general principles and requirements of food legislation¹⁸ in terms, for example, of responsibility to workers in the food sector and traceability of foodstuffs, in addition to provisions relating to food information for consumers¹⁹.

Article 4, paragraph 2, letter d) of the Treaty on the Functioning of the European Union (TFEU)^[20] recognizes that competence with regards to agriculture, including subsidies, is shared between the Union and the member states.

b) Is there a legal basis in the EU treaties that enables the Commission to act?

Point (1) of the planned ECI refers to agricultural subsidies and, more specifically, to the movement of subsidies from the farming sector to alternative eco-friendly sectors, such as cellular agriculture and plant protein. Similarly, point (2) of the latter refers to the introduction of incentives for the production and sale of plant-based products and products fabricated through cellular agriculture.

The legal basis for the subsidies in the context of the common agricultural policy (CAP) is established in Articles 42-43 of the TFEU. Agricultural and livestock subsidies are granted under the CAP on the basis of Regulation (EU) 1307/2013 ^[21] (CAP Payments Regulation). Ancillary rules are contained in Regulations 1308/2013, 1305/2013 and 1306/2013^[22].

¹⁸Regulation (EC) no. 178/2002, which establishes the principles and requirements of food legislation, establishes the European Authority for food safety and sets the procedures in the field of food safety. Official Journal L.31 of 1.2.2002, pg. 1

¹⁹Regulation (EU) no. 1169/2011 relating to the provision of information on food for consumers, which modifies regulations (EC) no. 1924/2006 and (EC) no. 1925/2006 of the European Parliament and of the Council and repeals Directive 87/250/EEC of the Commission, Directive 90/496/EEC of the Council, Directive 1999/10/EC of the Commission, Directive 2000/13/EC of the European Parliament and of the Council, Directives 2002/67/EC and 2008/5/EC of the Commission and Regulation (EC) No. 608/2004 of the Commission. Official Journal L.304 of 22.11.2011, pg. 18

²⁰Consolidated version of the Treaty on the Functioning of the European Union, Official Journal C 202 of 7.6.2016 pg. 47.

²¹Regulation (EU) no. 1307/2013 of the European parliament and of the Council of 17 December 2013, setting out rules concerning direct payments to farmers on support schemes under the common agricultural policy and repealing Regulation (EC) No. 637/2008 of the Council and Regulation (EC) no. 73/2009 of the Council, Official Journal L 347 of 20.12.2013, pg. 608-670.

²²Regulation (EU) no. 1308/2013 of the European Parliament and of the Council, of 17 December 2013, on the common organization of the markets in agricultural products, Official Journal L 347, 20.12.2013, pg. 671-854; Regulation (EU) No. 1305/2013 of the European Parliament and of the Council of 17 December 2013 on support for rural development by the European Agricultural Fund for Rural Development (EAFRD), OJ L 347, 20. 12.2013, p. 487-548; Regulation (EU) no. No 1306/2013 of the European Parliament and of the Council of 17 December

The CAP Payments Regulation sets out the requirements for applying for agricultural subsidies (Article 9), as well as the definition of these activities (Article 4(1)(c)). Farmers who meet the basic requirements are eligible to apply for subsidies. Therefore, a legislative proposal should seek to amend Article 4, paragraph 1, point c), point i), of the CAP Payments Regulation, which includes the 'production, rearing or growing of agricultural products, including harvesting, milking, animal husbandry and keeping of animals for agricultural purposes' in 'agricultural activity'.

The ECI could focus on the elimination of livestock farming from the definition of agricultural activity and the inclusion, for example, of eco-friendly alternatives like cellular agriculture and plant proteins.

The Commission could therefore submit a legislative proposal, also in the light of Articles 42 to 43 TFEU, to amend the CAP Payments Regulation, which will be adopted by the European Parliament and the Council, acting in accordance with the ordinary legislative procedure laid down in Article 294 TFEU.

c) What legal act is required by our proposal?

As regards our proposal on agricultural subsidies, one of the practical legal instruments that the Commission could use is a regulation amending the CAP Payments Regulation.

In accordance with the Joint Practice Guide on the Drafting of Community Law^[23], and in particular point 18.6, 'it is preferable that an amending act be of the same type as the act to be amended. In particular, it is not advisable to amend a regulation with a directive'.

It should be stressed that the CAP is implemented on the basis of successive 'strategic plans' which form the basis for subsequent delegated and implementing acts. After lengthy negotiations, the European Parliament, the EU Council and the European Commission reached an agreement on a comprehensive reform of the CAP on 25 June 2021. ^[24] The new CAP should be

2013, on the financing, management and monitoring of the common agricultural policy, OJ L 347, 20.12.2013, pg. 549-607.

²³ Joint Practical Guide of the European Parliament, the Council and the Commission for persons involved in the drafting of European Union legislation (2015), available at the following link: <https://eur-lex.europa.eu/content/techleg/KB0213228ITN.pdf>.

²⁴ Proposal for a regulation of the European Parliament and of the Council laying down rules on support for strategic plans to be drawn up by the member states under the common agricultural policy (CAP strategic plans) and financed by the European Agricultural Guarantee Fund (EAGF) and the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulation (EU) no. 1305/2013 of the European Parliament and of the Council and

implemented in all EU countries from 1 January 2023, pending the final agreement between the European Parliament and the Council of the EU. In order to allow payments to farmers and other beneficiaries of the CAP to continue, a transitional regulation was introduced for the years 2021 and 2022.

EFSA

In general, when preparing its policy and proposals on food safety, consumer safety, public health and the environment, the Commission relies on independent scientific committees to provide sound scientific advice and draw its attention to new and emerging problems.

Our ECI calls on the Commission to present a new legislative proposal in the field of food safety and to enact legislation concerning processes and ingredients used in cellular agriculture, therefore the Commission should request a risk assessment from EFSA.

In this regard, it is noted that the Commission has already asked EFSA to update its scientific and technical guidance in light of the emergence of novel foods onto the market. Indeed, following the adoption of the Novel Food Regulation, the Commission has asked EFSA to update and develop a scientific and technical guide for the submission of applications for authorization of novel foods.²⁵

We are aware of the existence of other ongoing initiatives and projects on cultured meat, which are funded by the EU and where risk assessments are carried out.²⁶ Overall, we believe that a Community initiative to call for the CAP to be amended to include products from mobile farming is feasible.

Regulation (EU) no. 1307/2013 of the European Parliament and of the Council. COM/2018/392 final - 2018/0216 (COD).

²⁵25 Guide to the preparation and submission of an application for authorization of a novel food in the context of Regulation (EU) 2015/2283. See <https://www.efsa.europa.eu/en/efsajournal/pub/6555>

²⁶For example, Meat4all, a research program on cultured meat, has received a grant of €2.7 million under the EU's Horizon 2020 R&D Funding Framework. This project aims to advance cultured meat production technology, improve market acceptance and conduct safety assessment tests in order to improve market acceptance and marketing. Read more about EU-funded research in cellular agriculture - ProVeg International, following this link: <https://proveg.com/blog/the-european-union-funds-research-in-cellular-agriculture/>

CONCLUSION

We believe that our ECI proposals, as formulated in the above mentioned framework, are suitable for registration by the Commission on the basis that the requested actions (i) concern a policy area under EU competence and (ii) clearly do not fall outside the scope of the Commission's powers to submit proposals for directives for the purposes of implementing the Treaties.