



Stockholm, June 8<sup>th</sup> 2020

EU Dog & Cat Alliance  
Att: Claire Wilson-Leary  
info@dogandcatwelfare.eu

Dear Claire,

Thank you for your position paper on the EU 2012-2015 Animal Welfare Strategy evaluation. You summarize the position of the EU Dog & Cat Alliance in the following paragraph:

“We call on the Commission to urgently develop a new and effective Strategy that includes specific measures for improving dog and cat welfare. This is supported by the Council of the EU which, in Council conclusions on animal welfare published in December 2019, invited the Commission to develop a new strategy that takes into account the assessment of the 2012-2015 Strategy.”

Although your paper is well planned and thorough, we in Svenska Djurskyddsföreningen would like to go a little further.

The old strategy resulted in no demonstrable overall improvement for the welfare of animals. Eurogroup for Animals (EfA) points out that the strategy should serve as a lesson: Strategies in themselves don't lead to anything. We need actions, not words, and we hope that this new Commission will deliver real improvements to the lives of animals through legal measures.

Given the experience provided by the strategy, we recommend that the Commission now looks at a set of specific actions to improve animal welfare this term, rather than coming forward with a new 'strategy' per se. We would like to call for legislative changes, with the revision of existing legislation and the development of new rules, instead of a new strategy.

Given the problems we have seen with certain pieces of legislation, we agree with EfA that the first priority should be to revise certain key acts that Member States have found difficult or impossible to implement, notably:

- To introduce horizontal rules for EU cross-border pet trade including online.
- To establish species-specific requirements for commercial transport of cats and dogs.
- To introduce mandatory identification requirements and data transfer mechanisms between Member States for dogs and cats, to combat the exploitation of the Pet Passport system and to make it easier to trace contagious diseases.

I understand that it is difficult to re-write your entire position paper at this late stage, but maybe you could add or change some parts so that it is clear that not only a new strategy is needed but also new legislation.

Kind regards

Johan Beck-Friis  
Secretary General, Svenska Djurskyddsföreningen