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Peter Kullgren, Minister for Rural Affairs of Sweden

**Dear Mr. Peter Kullgren,**

As representatives of the leading animal rights and animal welfare organisations in Europe, we are contacting you regarding Sweden's unique legislative pasture requirement for dairy cows. In recent years, parts of the Swedish dairy industry have questioned the pasture legislation, and in the recently presented official report Animal production with high competitiveness and good animal welfare (SOU 2024:56)<sup>1</sup>, the official enquirer proposes that the legislative pasture requirement should be removed for cows kept in loose housing systems. Such a change would seriously undermine animal welfare for the cows and also Sweden's reputation in the field of animal welfare in EU. The government has neither supported the proposal nor given any assurance that the pasture requirement will remain. We are appalled by the proposal and would with this joint letter like to urge you, the Swedish Minister for Rural Affairs Mr. Peter Kullgren, to protect the legislative pasture requirement for all cows.

### **Pasture is important for cow welfare**

Today, eight out of ten cows in the Swedish dairy industry are kept in loose housing systems. Loose housing systems offer an improvement for the cows in terms of opportunities for movement, compared to the tethered system. However, the floors are often hard and slippery, and it can be cramped, which together limit the chances of satisfactory movement. Access to pasture during the summer is essential to meet the needs of cows associated with their natural behaviour. This applies to cows in both tethered and loose housing systems. The positive effects of access to pasture on the welfare of cows, both in terms of physical health and the ability to perform natural behaviours, have been demonstrated in numerous scientific studies.<sup>2</sup> Two of the benefits are the softer ground that pasture provides, and the greater opportunity for movement and exercise. It has been shown that the behaviour of cows is more synchronised on pasture, and they move more.<sup>2</sup> Lameness and mastitis among dairy cows is very common and causes severe animal suffering. Access to pasture plays an important role in this regard as it has positive effects on udder, leg and hoof health.<sup>2-5</sup> Pasture also reduces the risk of reproductive disorders<sup>6, 7</sup> and mortality.<sup>8, 9</sup> According to EFSA recommendations, all cows should be given access to pasture.<sup>2</sup> In addition to all the physical health benefits and increased opportunities for natural behaviour that pasture management brings, it is also known that cows work hard to gain access to pasture. Research has shown that loose housing cows are highly motivated to access pasture, and the results suggest that they are motivated to engage in behaviours associated with being outdoors, including grazing.<sup>10</sup>



## **Legislation is essential**

The argument we are told, that cows will continue to have access to pasture even if the legislation is removed, does not hold water. The legislative requirement for access to pasture is proposed to be removed for loose housing cows, partly due to factors such as difficult logistics and lack of pasture land preventing existing dairy production from being maintained or expanded. Without pasture requirements in the legislation, you are free to practise dairy farming without access to pastureland. In addition, there is a strong misconception that cows in loose housing systems do not need access to pasture. It is mistakenly believed that the modern loose housing stables compensate for the benefits of pasture. Our firm opinion is that without legislation, fewer cows will get access to pasture.

The purpose of the Swedish Animal Welfare Act is to ensure good animal welfare and promote good animal well-being and respect for animals. The legislation also makes it clear what applies for both animal keepers and consumers, that cows must get access to pasture and how much. The legislative pasture requirement comes with an animal welfare control, so that it is possible to verify that the cows are really being let outside. The Swedish Animal Welfare Act clearly states that animals should be kept and cared for in a way that promotes their welfare and allows them to behave naturally, i.e. perform behaviours that they are strongly motivated to perform and that are important for their well-being. For cows, access to pasture means that several basic behavioural needs can be met, such as grazing, performing social behaviours, exercise and resting.

At EU level, work is in progress to revise and develop new animal welfare legislation. Sweden has so far been a driving and important voice in this context, for example on the issue of ending caging of animals and in the area of animal transport. At this point, weakening animal welfare legislation at national level, which the removal of the pasture requirement would entail, would send a clear signal to the EU and the rest of the world that animal welfare is not so important to Sweden. It would be devastating, not only for all the cows in Sweden that, as a direct consequence of the legislative weakening, would be kept only indoors, but also for the possibilities of strengthening animal welfare legislation at EU level and nationally in other countries in and outside the EU. Individual member states do need to take the lead. Sweden has taken the lead and is ahead in terms of pasture legislation for cows. We encourage you to be proud of that lead and use it to the full. Please do what you can to ensure that more, not fewer, cows and other animals get access to pasture.

## **Protect the legal right of cows to pasture**

We urge you, Minister for Rural Affairs Peter Kullgren, to protect the Swedish legal requirement for pasture and thus the welfare of the cows, and the opportunities for Sweden to contribute to strengthened animal welfare at EU and global level. Please ensure that cows in Sweden maintain their legal right to access pasture.



**Yours sincerely,**

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Reineke Hameleers, CEO, Eurogroup for Animals

Peter Stevenson, Chief Policy Advisor, Compassion in World Farming, United Kingdom

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David Bowles, Head of Campaigns & Public Affairs, RSPCA, United Kingdom

Thomas Schröder, President, Deutscher Tierschutzbund e.V., Germany

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Jasmina Filipič, dr. vet. Med., Animal Enterprise Transparency Project (AETP), Slovenia

Ervin Nagy, President, Una Terra Foundation, Hungary

Katrīna Krīgere, Executive Director, Dzīvnieku brīvība, Latvia

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Kirsty Henderson, President, Anima International

Martin Smrek, Executive Director, Humánný pokrok, Slovakia

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