

4. August 2025
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Animal Protection Denmark consultation response to AMvB Dierwaardige Veehouderij

Animal Protection Denmark appreciates the opportunity to comment on the decree on improved animal welfare for farmed animals in the Netherlands (AMvB Dierwaardige Veehouderij).

Animal Protection Denmark does not comment on the specific proposals at species level in this consultation feedback. Instead, our remarks concern the overarching principles and the overall direction of the decree. We focus on the structural and cross-cutting elements that we believe are essential for achieving high and coherent animal welfare standards across all farmed animals.

As acknowledged by the European Commission, the current EU animal welfare legislation does not sufficiently reflect growing societal expectations, ethical considerations, scientific and technological advancements, or the sustainability challenges we face in the future¹. Therefore, the existing legislation is not considered adequate to meet present and future needs.

We recognise that the Netherlands is taking proactive steps to enhance the welfare of farm animals, and we wish to express our support for national initiatives that take the lead and set an example for the rest of Europe.

The Vught Alliance and Citizens' Expectations

EU citizens are calling for concrete actions and structural improvements that ensure a better life for animals. That is why it is essential that some countries set higher animal welfare standards and show the way for others – it helps build trust in politicians, both nationally and at EU level, as agents of change who reflect the values and expectations of the public.

The Vught Alliance between countries like the Netherlands and Denmark sends a strong and important signal. When a group of like-minded member states unite around shared ambitions for animals, it demonstrates that improved animal welfare is both achievable and politically desirable.

¹ COMMISSION STAFF WORKING DOCUMENT EXECUTIVE SUMMARY OF THE FITNESS CHECK EU Animal Welfare legislation [SWD/2022/0329 final](#)



It is important that some member states take the lead and pave the way toward higher animal welfare standards and when countries like the Netherlands and Denmark act proactively, they generate momentum within the EU and provide direction for future common legislation.

Higher animal welfare standards are aligned with the enduring support among EU citizens. More than 1.4 million signatures were collected for the European Citizens' Initiative "End the Cage Age", and 1.5 million for "Fur Free Europe" – two of the most successful initiatives in ECI history².

This proves that animal welfare is not a niche concern but a central issue for many Europeans. A recent consumer survey from The European Consumer Organisation (BEUC) also found that 81% of consumers in eight EU countries believe that improving animal welfare should be a top priority in the administration of the EU's Common Agricultural Policy (CAP)³.

Animal Protection Denmark emphasise the importance of ensuring that no animal is left behind in the scope of this decree. This principle is central to achieving true progress in animal welfare. All farm animals, deserve comprehensive protection and higher minimum welfare standards. This inclusive approach not only reflects ethical responsibility but also strengthens public trust in legislation as a fair and science-based instrument for safeguarding animal welfare.

Evidence-Based Legislation

We believe it is crucial that future national and European animal welfare legislation is firmly rooted in the latest scientific knowledge, including independent and science-based advice from the European Food Safety Authority (EFSA), which should be systematically included in the development of both general and species-specific regulations.

An evidence-based approach ensures that rules not only better protect animals but also provide a more consistent and transparent framework for citizens, authorities, and the agricultural sector across the EU.

The "Five Domains" Framework as the Basis for Animal Welfare Legislation

Animal Protection Denmark recommends that future legislation is based on the internationally recognised "Five Domains" model⁴.

This model is grounded in science and the European Commission has also acknowledged it as a key reference in the ongoing revision of EU animal welfare legislation⁵.

² [https://citizens-initiative.europa.eu/find-initiative_en?STATUS\[0\]=ANSWERED](https://citizens-initiative.europa.eu/find-initiative_en?STATUS[0]=ANSWERED)

³ BEUC (2025). The Common Agricultural Policy (CAP): What consumers want. [Survey report](#).

⁴ Mellor DJ. Operational Details of the Five Domains Model and Its Key Applications to the Assessment and Management of Animal Welfare. *Animals (Basel)*. 2017 Aug 9;7(8):60. doi: 10.3390/ani7080060. PMID: 28792485; PMCID: PMC5575572. [Link here](#).

The model offers a holistic view of animal welfare by assessing both physical and mental factors across five interconnected domains:

- **Nutrition** – access to sufficient and appropriate food and water
- **Environment** – physical comfort, temperature, flooring, space, and safety
- **Health** – absence of disease, injury, and discomfort
- **Behaviour** – ability to express natural and species-specific behaviours
- **Mental state** – the animal’s overall emotional experience and well-being

The fifth domain – mental state – is the core and ultimate goal of the model. It integrates the other four domains and evaluates how they influence the animal’s feelings and perceived quality of life. It is not only about avoiding pain, fear, and stress, but also about promoting positive mental states such as comfort, curiosity, contentment, and social interaction.

By recognising animal sentience and placing animals’ own experiences at the centre, the Five Domains model provides a foundation for legislation that not only prevents suffering but actively enables a life worth living. This marks a significant shift from earlier models, where welfare was primarily assessed by the absence of negative conditions.

Ethics and Science Go Hand in Hand

Animal Protection Denmark wishes to emphasise that ethics and animal welfare are inseparably linked. Ethical considerations are not in opposition to evidence – they are a necessary foundation that should be acknowledged as a legitimate basis for decision-making. All concrete improvements in animal welfare ultimately rest on an ethical recognition that animals’ needs and well-being have intrinsic value.

In Conclusion

We look forward to following the process and encourage the Netherlands to maintain an ambitious course for animal welfare. Strong voices are needed in Europe that prioritise the welfare of animals – especially at a time when EU legislation is under revision.

⁵ European Commission Inception Impact Assessment Ref. Ares (2021)4402058 - 06/07/2021