

ERBS Beef Sustainability Outcomes Consultation *Response*

The consultation

In 2018, the European Roundtable for Beef Sustainability (ERBS) drafted measurable outcome-based targets at the European level across four priority action areas: 1. Environment – GHG emissions; 2. Animal Medicines; 3. Animal Health and Welfare; 4. Farm Management.

With the objective of gathering insights and input on these outcome targets, the ERBS opened a public consultation. The consultation survey was shared directly with key stakeholders and available online on the SAI Platform website for a period of 60 days.

Through this process, stakeholders provided feedback on the following:

- Whether the outcome targets were both appropriate and ambitious to drive meaningful progress across a diverse European beef industry
- The difficulty level to achieve the targets
- Recommendations for improvement

The results

The public consultation received a high level of interest from a wide range of stakeholders across the EU and beyond, representing producers, allied industry, retail and food service, civil society and academia.

Overall, responses were positive, validating that the ERBS is on the right track and that the outcome targets are meeting the expectations and ambitions of the stakeholders. All outcome targets were mostly perceived as appropriate and ambitious – particularly those for farm management. Most of the respondents ranked the difficulty to achieve the targets as moderate to hard for all priority areas.

The ERBS would like to thank all who contributed to this development to ensure it is consistent, clear, relevant and robust. After a careful review of all feedback by the ERBS Technical Committee the following addition has been decided:

Priority area 1: Environment (Greenhouse Gas Emissions)

Previous outcome target: *An intensity reduction of 15% in GHG farm emissions by 2025*

Revised outcome target: *An intensity reduction of 15% in GHG emissions by 2025, with the aim of setting a future target that recognises the positive role beef production can contribute to mitigating climate change through reduction strategies and sequestration*

Why: The topic of Greenhouse Gas emissions is currently evolving. The existing workstreams across Europe and the subject of carbon sequestration is at the forefront on numerous discussion and The ERBS recognises the positive contribution that beef production has in this subject area and will review this target when further science is available.

The ERBS welcomed all other points raised, both on the targets themselves as well as on how to achieve them and measure them. Nevertheless, the Technical Committee has recommended not to make any additional changes at this phase. The table below presents an overview of the main recommendations on the targets, and the ERBS response explaining why changes have not been made at the moment. Recommendations on how to achieve and measure the targets will be considered in due course. The ERBS would like to emphasize that the current targets will be reviewed regularly ensuring that the roundtable drives appropriate and ambitious beef sustainability goals.

Priority area 1. Environment (Greenhouse Gas Emissions): Improve the Environmental footprint of farming systems

1.1 An intensity reduction of 15% in GHG farm emissions by 2025	
Recommendations	ERBS Response
<ul style="list-style-type: none"> • Consider positive mitigation figures on carbon sequestration • Focus on management issues (e.g. feeding, fodder, grassland management) • Specify per beef class • Break down the goal into emission categories as areas of work • Define the meaning of intensity and the boundaries of the target • Multiple conflicting opinions with respect to the ambitiousness of the target 	<p>Recommendations related to carbon sequestration have been taken on board in the revised outcome target (see above).</p> <p>The outcome target has been taken from the existing European Beef Life Carbon project and includes greenhouse gas emissions from field to farm gate. According to current climate science, this target is aligned with the pace of improvement needed to limit the earth's warming to 2 degrees by 2100 (i.e. the goal of the Paris Climate Agreement). The ERBS acknowledges the challenges on Greenhouse Gas Emissions in the European context and will provide further detail on the specifics of the target.</p>

Priority area 2. Animal medicines: Preserve the effectiveness of animal medicines in beef farming

2.1 Total usage of antibiotics below 10mg/kg PCU by 2023	
Recommendations	ERBS Response
<ul style="list-style-type: none"> • Calculate rates by category (e.g. calves, suckler) • Use other indicators, such as ALEA (Animal Level of Exposure to Antimicrobials) • Use a systems / management approach that includes other activities on-farm to reduce the need for anti-biotics • Have a more ambitious target 	<p>Antibiotics targets are taken from the Responsible Use of Medicines in Agriculture (RUMA) guidelines which are defined by industry experts. The PCU figure is a standardised recording platform across Europe which considers the increased usage in young animals over a lifetime.</p> <p>The ERBS timing is different to those set out by RUMA considering a lower maturity level and allowing for appropriate time spans to set baselines and develop strategies to meet the targets. The ERBS aims to shift a wide European production base acknowledging that in some systems or countries these targets are not overly ambitious, we are trying to bring all countries along the same journey.</p>
2.2 Reductions of 50% in the use of HP-CIAs (Highest Priority Critically Important Antimicrobials) by 2023	
Recommendations	ERBS Response



<ul style="list-style-type: none"> • Aim to phase out CIAs and not just to reduce them • Consider potential morbidity and mortality increases when reducing HP-CIAs 	<p>The ERBS is taking a wider approach to antibiotics than just CIAs. It wants to encourage better herd health planning and management to remove the requirements to antibiotics usage completely through preventative management. This outcome target is linked with mortality figures presented in Priority area 3: Animal Health and Welfare. None of the outcome measures sit in isolation.</p>
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Priority area 3. Animal Health and Welfare: Improve Animal Health and Welfare

<p>3.1 Target mortality rates are below 1.5%* * for systems with mortality rates above this target, a year on year reduction of 20% should be achieved</p>	
<p>Recommendations</p> <ul style="list-style-type: none"> • Do not set a fix rate. Support farmers with their own ambitions on mortality rates • Focus on reducing accidents, injuries, suffering and diseases of animals 	<p>ERBS Response</p> <p>Mortality is the overall impact that the ERBS aims to drive depending on several inputs such as management practices, health planning, etc. This will be based on industry data and as such needs to be kept top level. Each farm will have its own challenges but at industry level these should be within the target.</p>
<p>3.2. All animals have access to loose housing (when housed) by 2030</p>	
<p>Recommendations</p> <ul style="list-style-type: none"> • Consider country-level differences when evaluating the difficulty level to achieve the target. It is easy to achieve in some countries and very difficult in others • Have a measurable target (e.g. percentage of dairy cows kept in loose housing systems) • Allow to combine traditional stables (without loose housing) and pasture 	<p>ERBS Response</p> <p>The application of this outcome will be very different between countries and between production systems within countries. The ERBS does not believe any one group of animals can be treated differently to the others, hence the target applying to all animals. However, the ERBS is fully aware that this is a big challenge in some countries and see this as driving change, albeit over a long time period, and the direction of travel is as important as the ultimate target.</p>
<p>3.3. All animals are given pain relief (analgesics) for all surgical procedures and for all forms of castration, dehorning and disbudding</p>	
<p>Recommendations</p> <ul style="list-style-type: none"> • Add criteria to identify pain, protocol, and monitoring of the treatment • Add timeline • Provide guidance on how the target is going to be measured at a national level to prevent significant divergence in adoption between countries • Aim for the phase out of at least some forms of mutilation (e.g. dehorning) with a specific target date set • Consider different requirements around the age of the animal and the type of the (non-surgical) procedure 	<p>ERBS Response</p> <p>The goal of this target is to achieve 100% use <u>from now</u> of pain relief (analgesics) for all surgical procedures and for all forms of castration, dehorning and disbudding. All strategies to drive this target will report on a current situation and improvement year on year.</p> <p>Comments about specific practices have been taken on board but until veterinary advice and industry practices change the ERBS believes that ensure the animal has appropriate pain relief when such practices are undertaken is the priority. The impact of phasing out dehorning, for example, would increase the number of polled bulls used as a positive, but at the same time, could result in more animals with horns which presents its own welfare and health and</p>

	safety challenge. The ERBS will ensure these outcomes are kept up to date with veterinary advice.
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Priority area 4. Farm Management: Improve the resilience of beef farming

4.1. A reduction in serious accidents of workers (reportable; ref: European Reporting Framework) on farm and a reduction in fatalities with an overall target of zero	
Recommendations	ERBS Response
<ul style="list-style-type: none"> • Consider potential challenges on data collection • Tailor the target towards more specific dangers • Make the target more specific indicating a clear measure 	The measure of this target will be taken from national reporting structures under EU legislation. Each country will be able to focus on the individual challenges it faces within this area to drive behavioural change at farm level.
4.2. Financially viable farms that have a business plan in place	
Recommendations	ERBS Response
<ul style="list-style-type: none"> • Define the scope / quality of the business plan and the meaning of being financially viable • Extend beyond farm level to encompass the wider supply chain • Consider sensitivity and transparency issues when collating accounting figures • Evaluate the link between the target and the desired impact. Farming resilience goes beyond financial resilience 	The economic status of farms is a hugely sensitive issue. The ERBS have approached this from the point of country platforms providing farmers the tools to understand their economic performance and make decisions based upon it, without looking for financial information. In country strategies will look to develop tools, collate data where appropriate and support the ambition of the ERBS in this area.

The ERBS responses have been approved by the ERBS Interim Board and the final outcome of the ERBS Beef Sustainability outcomes are now publicly available on the [SAI Platform website](#).

In the meantime, the ERBS continues working on the how to report on progress against the targets.

For any questions on the consultation and the ERBS response please contact [Patricia Garcia Diaz](#).

The European Roundtable for Sustainable Beef