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A legal analysis of agricultural subsidies as instruments for supporting animal welfare in Sweden and Finland and systematisation of controls

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ABSTRACT

This article examines which farm subsidy instruments Finland and Sweden use to support animal welfare and how national animal welfare standards that exceed European Union minimum requirements affect the legal framework for controls and the use of subsidy instruments. The study combines doctrinal and comparative legislative analysis with empirical analysis of the national CAP Strategic Plans of Finland and Sweden. The findings show that Finland employs a broader range of voluntary animal welfare instruments, whereas Sweden's approach is more targeted. The analysis further demonstrates that where national animal welfare standards exceed EU minimum requirements, the scope for voluntary support becomes narrower and animal welfare controls more layered. Official animal welfare controls and subsidy controls form an overlapping regulatory structure based on both EU and national legislation. In Member States with more stringent welfare requirements, the complexity of legislative framework may contribute to the administrative burden on both farmers and authorities.

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Animal welfare; farm subsidies; common agricultural policy; controls; administrative burden

Introduction

The common agricultural policy (CAP) of the European Union (EU) is a regulatory framework that aims to financially support agricultural producers and improve agricultural productivity (Article 39 of the EU Treaty, TFEU). More specifically, the CAP aims to ensure fair living for EU farmers, fight climate change, use natural resources in a sustainable way, preserve rural areas and landscapes across the EU, and keep the rural economy alive by increasing jobs in agriculture, the food industry, and related sectors (European Commission, 2026). The CAP has been claimed to be bureaucratic and result in an excessive administrative burden (European Commission, 2025). In this study, administration is addressed through regulations on animal welfare and subsidies supporting animal welfare, where the complexity is especially visible.

Union legislation governing the CAP changes from one program period to the program period (European Commission, 2026). A new concept of conditionality was introduced for this CAP program period (2023–2027). Previously, from 2005 to 2022, the corresponding system was referred to as cross-compliance (Bonafos et al., 2010). Conditionality links CAP support to compliance with basic requirements regarding the environment, climate change, public health, plant health, and animal welfare (Guyomard et al., 2021).

The CAP also allows Member States to support higher welfare standards through voluntary instruments such as animal welfare payments, support for advisory services, cooperation measures, and investment support (Guyomard et al., 2021). Based on the funding source, subsidies are currently divided into direct payments financed entirely by the EU (pillar I), subsidies from rural development programs partly financed by the EU (pillar II), and subsidies financed entirely by the national government (Guyomard et al., 2021). Farmers can take advantage of various forms of support based on animal species, arable area, production sector, or production volume, each of which has its own goals and support conditions. The interaction between EU rules, national legislation, and control systems is described in national CAP Strategic Plans in accordance with Regulation (EU) 2021/2115.

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EU institutions regularly follow and report on the implementation of the CAP. Weak implementation and variable interpretations of the prevailing EU animal welfare legislation have been identified in earlier studies (European Court of Auditors, 2018; Council of the European Union, 2019). The European Court of Auditors (2016) reported that 50% of the infringements of cross-compliance were related to requirements concerning farm animals. In a subsequent report, the European Court of Auditors (2018) stated that CAP funds could be used more effectively to promote animal welfare.

Animal welfare in the EU is considered a public good (Guyomard et al., 2021). Subsidy instruments supporting animal welfare provide farmers with compensation for the loss of income resulting from increased production costs from investing in animal welfare ((EU) 2021/2115, Art. 109). To ensure proper use of funds, the European Commission regularly follows the performance of member states' CAP Strategic Plans (European Commission, 2023a) and assesses how CAP Strategic Plans contribute to the delivery of CAP objectives (European Commission, 2023b). One of the specific goals of the current program period is to improve animal welfare as part of EU agriculture's response to citizens' demands ((EU) 2021/2115, Art. 6). European Citizens consider animal welfare an increasingly important part of sustainable ways of living (Council of the European Union, 2019; European Commission & Kantar Public, 2023).

Previous empirical research (Lundmark Hedman et al., 2018; Bergschmidt et al., 2021; Väärikkälä, 2021; Veissier et al., 2021) has addressed CAP, animal welfare, and controls, but less attention has been paid to how these elements are combined in national CAP Strategic Plans and how the controls are arranged when controls for subsidies are considered. Godfroy and Muro (2025) published an EU-wide report on how national CAP Strategy Plans incentivise actions to improve animal welfare. In previous legal analyses (Sowery, 2018; Leone, 2020; Ryland, 2023; Kubíková, 2025), the perspective has been EU-wide, often examining the development of animal welfare regulation in the EU within a historical context. Focusing on two Member States offers the opportunity to examine animal welfare-related subsidies in more depth, as they are often viewed under a larger sustainability umbrella (Buller et al., 2018; Brennan et al., 2021; Adams et al., 2025) or are discussed together with animal health (European Commission, 2023b; Godfroy & Muro, 2025).

This study examines policy choices in the CAP Strategic Plans of Finland and Sweden through a combination of doctrinal, comparative, and empirical methods, with a focus on animal welfare. In addition, the effect of a higher animal welfare level than that required in EU directives on controls was explored using Finland as an example. For this purpose, systematisation, a core element of doctrinal legal analysis, is used to organise legal norms in a coherent and structured way (Theil, 2025). Systematisation involves identifying the structural, logical, and hierarchical connections between norms and restructuring the legal system as a consistent framework (Varuhas, 2023).

Agricultural subsidies supporting animal welfare and their supervision have developed into a complex administrative matrix, which may be difficult for both farmers and supervisors (Henttu et al., 2017; Lundmark Hedman et al., 2018). Concerns regarding the complexity of CAP are longstanding: the European Parliament noted already in 2015 that the complexity of the EU and national animal welfare rules created legal uncertainty (European Parliament, 2015). Similarly, the European Court of Auditors (2016) highlighted the complexity of CAP control procedures.

Complexity may undermine farmers' legal protection, particularly if they lack adequate awareness of their statutory obligations. This challenge is further reinforced by multilevel governance, in which responsibilities are distributed across multiple authorities (Bornitto et al., 2025). As a result, farmers must navigate not only complex legal norms but also the different authorities. In complex regulatory contexts, such as EU agricultural and animal welfare legislation, systematisation is particularly important for clarifying fragmented and multilevel regulatory frameworks and for improving the accessibility and predictability of legal obligations.

Accordingly, this article addresses two questions: first, which CAP subsidy instruments Finland and Sweden use in their national CAP Strategic Plans to support animal welfare, and second, how higher national animal welfare standards affect the animal welfare controls, the use of subsidy instruments, and administrative burden from a legal perspective. By answering these questions, this article aims to examine the legal interplay between mandatory and voluntary CAP mechanisms and to systemise the overlapping control structure that governs animal welfare support.

Finland and Sweden are useful for comparison because they have similar farming structures and administrative traditions (Husa, 2000). Comparison is particularly interesting for two reasons: both are Member States with animal welfare standards above the EU minimum, yet they have adopted different approaches

to implementing CAP support for animal welfare. Including these two countries in the analysis makes it possible to show not only which instruments are available but also how different legal and policy settings shape the practical room under the CAP framework. The findings indicate that where national animal welfare standards go beyond the EU minimum requirements, the scope for voluntary support may be more limited, while the control framework tends to become more complex.

The methods used in this study are presented in detail in the following section. The results are presented in three sections. First, conditionality, which anchors the minimum level of animal welfare to subsidies paid to farmers and is considered a mandatory welfare instrument, is addressed. The analysis is conducted at the EU level because the principle of conditionality is harmonised. The second chapter focuses on voluntary subsidy instruments to support animal welfare in Finland and Sweden’s CAP strategic plans. The third chapter addresses the matrix-like structure of official controls for animal welfare and supervision of subsidies supporting animal welfare through the Finnish model of controls. Finally, the results are discussed in the broader European context. Understanding the available legal possibilities to support animal welfare and systematisation of the complex structure of animal welfare support and controls contributes to developing more coherent and effective regulation, as well as achieving the CAP objectives of enhancing animal welfare and reducing the administrative burden.

Materials and methods

Materials of the study

The materials of this study consisted of European Union and Finnish legislation governing farm animal welfare and agricultural subsidies supporting animal welfare and their supervision. The legal framework examined in this study is presented in Table 1. In addition, the material included the national CAP Strategic Plans of both Finland (Maa-ja metsätalousministeriö, 2022) and Sweden (Regeringskansliet, 2023). Desk research was used to support the analysis of legal material. Further material comprised reports by the EU’s main legislative institutions as well as previous research on animal welfare under the CAP framework.

Legal methods

The Methods in legal studies are different from those used in exact sciences. In legal research, the method generally refers to the practice utilised to collect and analyse pieces of information about the law (Husa, 2024). Legal research is often in practice a combination of several methodological approaches (Theil, 2025). This study combines doctrinal legal analysis with comparative and empirical legal analyses.

Doctrinal research focuses on the systematic analysis of legal rules derived from authoritative sources, such as legislation, case law, and legal doctrine, which refers to established legal principles (Theil, 2025). Comparative legal analysis, in turn, can be described as a heuristic understanding of different legislative

Table 1. Regulatory framework for animal welfare and related subsidies. The CAP Strategic Plan links the EU and national levels.

ANIMAL WELFARE	SUBSIDIES
EU directives laying down minimum standards for farm animal welfare and determining statutory management requirements (SMRs) Council Directive 1986/609/EEC Protection of animals kept for farming purposes, 1986, OJ L 221/23 Council Directive 2008/119/EC Protection of calves, 2008, OJ L 10/ 7 Council Directive 2008/120/EC Protection of pigs, 2008, OJ L 47/ 5	EU Regulations on farm subsidies for the period 2023–2027 Rules on support for Strategic Plans drawn up by EU countries under the common agricultural policy, Strategic plan regulation (EU) 2021/2115, 2021, OJ L 435/1 Delegated Regulation (EU) 2022/126, 2021, OJ L 30/52
EU legislation on controls Official controls regulation, OCR (EU) 2017/625, 2017, OJ L 95/1.	EU legislation on controls Rules on the financing, management and monitoring of the common agricultural policy, horizontal regulation (EU) 2021/2116, 2021, OJ L 435/187 Implementing Regulation (EU) 2022/128, 2022, OJ L 30/131
National animal welfare legislation National administrative legislation	CAP STRATEGIC PLAN National farm subsidy legislation

systems (Husa, 2024). While the comparative approach enables the examination of similarities and differences in legal solutions between national CAP Strategic Plans, the systematisation of the relevant EU and national legal frameworks allows organisation and description of legal components within a legal system (Varuhas, 2023). Legal praxis and sanctions were excluded from this study. The purpose of legal analysis is not to make causal claims about the effects of legal rules. Instead of evaluating animal welfare outcomes at the farm level, this study aims to map the legal and administrative structure through which animal welfare is supported and supervised under the current CAP period.

Empirical method

Empirical legal research is valuable in complementing doctrinal legal research, as doctrinal analysis is primarily concerned with examining the law as it currently stands (Theil, 2025). To further analyse the CAP Strategic Plans, an empirical study using summative content analysis (Hsieh & Shannon, 2005) was employed. Using a set of predefined keywords (animal welfare, animal protection; eläinten hyvinvointi, eläinsuojelu, and djur välfärd, djurskydd in Finnish and Swedish respectively), sections addressing animal welfare were identified within the text, and interventions and welfare aims were systematically catalogued using a spreadsheet program (Microsoft Excel). Observations were compiled by the headings of each chapter related to animal welfare support instruments. The number of measures was quantified by counting the number of interventions and goals designed to promote animal welfare.

Results

Conditionality – an obligatory animal welfare instrument of CAP

The scope for Member States to exercise discretion in the application of conditionality is limited, as it is grounded in common rules linking subsidy payments to compliance with the minimum animal welfare requirements laid down in directives ((EU) 2021/2115, Art. 12); these requirements form part of the Statutory Management Requirements (SMRs). Member States establish standards for SMRs in their CAP Strategic Plans ((EU) 2021/2115, Art. 12). In general, farmers can only receive payments if they comply with the SMRs and can be subject to administrative penalties if they do not.

Animal welfare conditionality is based on SMRs derived from directives for the protection of calves, pigs, and animals kept for farming purposes (Table 1), which are implemented in national legislations. However, Council Directive 1999/74/EC Protection of laying hens (1999 OJ L 203/53) and Council Directive 2007/143/EC Protection of chickens kept for meat production (2007 OJ L 182/19) are not part of the SMRs (Annex III of (EU) 2021/2115).

Conditionality is considered an important part of the CAP, and it ensures that payments promote a high level of sustainability and contribute to the application of common standards across Member States and the Union, especially when it comes to the CAP's social, environmental, and climate goals as well as issues related to public health and animal welfare ((EU) 2021/2115, 42 recital). To ensure effectiveness, monitoring is carried out, and sanctions are applied if necessary ((EU) 2021/2116, 66 recital). According to Article 12 of (EU) 2021/2115, failure to meet the conditionality requirements will result in sanctions for farmers' subsidies; if negligence is caused by, for example, damage to agricultural land, subsidy reduction is allocated to all subsidies based on area and animals. To ensure equal operating conditions between Member States, the regulation is harmonised at the Union level with common minimum rules regarding conditionality, monitoring, and sanctions related to non-compliance; however, in such a way that the organisation of competent monitoring bodies and monitoring is under the jurisdiction of each Member State ((EU) 2021/2116, 66–67 recitals).

SMRs are implemented in the relevant national legislation, and they apply as implemented by a Member State in question ((EU) 2021/2115, Art 12). Consequently, in Member States, where national animal welfare standards exceed those set out in directives, the same body of legislation may include rules that are SMRs and thus affect CAP payments through conditionality, as well as rules that fall outside of SMRs and are therefore not included in conditionality. The resulting complexity is addressed later in this article in the section on controls.

Voluntary animal welfare instruments in CAP strategic plans of Finland and Sweden

While conditionality is based on SMRs and aims to ensure the minimum level of animal welfare, there are other CAP instruments that can be used to support animal welfare. Subsidies from the rural development program (pillar II) can be used to support producers in keeping animals at a level that exceeds the minimum level required for conditionality (European Court of Auditors, 2018). Some voluntary subsidy instruments can only be used to support activities in which animal welfare exceeds the level set by national legislation. Article 114 of the TFEU allows higher national animal welfare requirements if provisions meet the aims stated in Article 36 of the TFEU, which include protection of the health and life of animals, if they do not restrict trade between Member States.

Articles 31 and 70 of (EU) 2021/2115 anchor the minimum requirement of voluntary subsidies paid under these articles to the national level of animal welfare legislation as follows:

... where national law imposes new requirements which go beyond the corresponding minimum requirements laid down in Union law, support may be granted for commitments contributing to compliance with those requirements for a maximum of 24 months from the date on which they become mandatory for the holding.

Because of the abovementioned provision, the repertoire of subsidy instruments that can be used to support animal welfare is limited in Member States with higher national standards for animal welfare.

Finland and Sweden have adopted different approaches in their CAP Strategic Plans and employ partly different voluntary instruments to promote better animal welfare. Overall, Sweden's CAP Strategic Plan is shorter, has fewer instruments related to animal welfare, and the interventions are more concrete than those in Finland. Åland, a self-governing area in Finland, is included in the Finnish CAP Strategy Plan. Åland has its own animal welfare legislation (the Animal Protection Act (1998/1995) and the Animal Protection Order (1998/1996)) and is not included in this study.

Both countries have identified the need to improve animal welfare: Sweden combined it with animal health and Finland, in turn, with animal healthcare. Finland had a total of 50 strategic goals, five of which involved animal welfare. For comparison, Sweden's CAP Strategic Plan had 46 goals, three of which were related to animal welfare. However, these goals were to be achieved via a large number of interventions in Finland: 20 different intervention types for better animal welfare were identified in Finland and five in Sweden.

Animal welfare payments

Animal welfare payments are used in both Finland and Sweden. They are part of the interventions for rural development, environmental, climate-related, and other management conditions based on Article 70 of (EU) 2021/2115. Animal welfare commitments must provide upgraded standards for production methods in the areas specified in Article 46 of Delegated Act (EU) 2022/126.

The aim of welfare payments is to develop animal welfare, healthcare, and biosecurity on farms. Welfare payments can be paid to cattle, pig, sheep, goat, and poultry farms in Finland (Maa-ja metsätalousministeriö, 2022) and to sheep, dairy cows, and sows in Sweden (Regeringskansliet, 2023).

According to new CAP Strategic Plans, 23% of EU livestock units are under animal welfare support, most resources allocated to improving living spaces and housing conditions as well as supporting outdoor grazing practices in dairy, beef, and veal production (European Commission, 2023c). The indicator goal for animal herds involved in animal welfare payments is 98.12% in Finland and 17.35% in Sweden (Maa-ja metsätalousministeriö, 2022; Regeringskansliet, 2023).

During the first year of the current program period, 98.12% of the livestock units in Finland were covered by measures that improve animal welfare, but fewer commitments were made to welfare compensation than previously, which is explained by the decrease in the number of livestock farms (Maa-ja metsätalousministeriö, 2024).

When applying for animal welfare payments, the farm chooses the measures it wants to commit. Table 2 demonstrates the differences between Finnish and Swedish approaches to animal welfare payments. In Finland, each action is planned as a separate intervention. In Sweden, there are only three separate interventions.

Table 2. Animal welfare payment requirements in the CAP Strategic Plans of Finland and Sweden.

	Bovine	Porcine	Sheep (and goats in FI)	Poultry
Finland (*Åland)	Welfare plan *	Welfare plan	Welfare plan *	Welfare plan
	Calving, care and sick pens *	Free farrowing	Improving conditions for sheep and goats*	Improving poultry conditions
	Improving the conditions of calves *	Improved farrowing conditions	Sheep and goat grazing	
	Improving conditions for male cattle *	Improving the conditions of gilts/sows		
	Cattle crazing	Improving the conditions of weaned piglets		
	Outdoor access of cattle	Improving conditions for pigs for meat production		
Sweden	<i>Only for dairy cows</i> Hoofcare	<i>Only for sows</i> Production planning Feeding routines Analysis of feed and bedding material Body condition scoring Production follow-up	<i>Only for sheep</i> Feeding – planning, calculation and analysis Production planning Body condition scoring Clipping Procedures for receiving new animals Sampling for parasites	-

Based on the CAP Strategy Plans of Finland and Sweden, several differences were identified in the approaches to animal welfare payments. In Finland, a welfare plan is mandatory for all animals included in commitments to animal welfare payments. It must describe the conditions, preparedness for disturbance situations, implementing production and feeding, disease protection, improving well-being, and possible findings and developmental needs of the farm. In Finland, welfare payments are applied to both dairy and beef cattle, including calves, whereas in Sweden, animal welfare payments are directed at dairy cows, and only for hoof health.

In Sweden, welfare payments for porcine animals are available only for sows or farrowing sows. The conditions included in Swedish welfare payments for sows are partly similar to those in the Finnish welfare plans. In Sweden, analysis of food and straw is required, as well as body condition scoring, which are not included in the Finnish welfare plans. The Finnish system also provides the option of improving the conditions of fattening pigs and weaned piglets.

For sheep, body condition scoring, clipping, and parasite samples are measures that are used in Sweden but are not described in the Finnish CAP Strategic Plan. Conversely, in Finland, welfare payments are paid for measures improving animal housing conditions, where, for example, larger pens and grazing are supported. Welfare payments for goats and poultry are available only in Finland.

In Finland, animal welfare payments are paid to farms with an average of 15 livestock units of bovine and porcine animals and five animal units of ovine or caprine animals. Sweden requires only one dairy cow, sow or gilt, or sheep.

Investment subsidies

Investment subsidies according to Article 73 of (EU) 2021/2115 have a target of improving animal welfare in Finland but not in Sweden. In Finland, investments aimed at modernising production are expected to have a positive effect on animal welfare (Maa-ja metsätalousministeriö, 2022). The Commission estimates that 4% of farms (400,000 beneficiaries) will apply for investment support (European Commission, 2023c). During the financial year 2023, 80 positive support decisions were made for investments aiming to improve animal welfare and biosecurity, and 98 applications were pending at the end of the financial year (Maa-ja metsätalousministeriö, 2024). The goal of the intervention is to finance 900 investments during the 2023–2027 funding period. In Finland, investment subsidies are no longer granted to tie stalls; instead, the investment subsidies are directed toward the renewal and expansion of loose housing and for sows. Only such construction investments that use free porcing are supported, based on the forthcoming ban of constructing new tie stalls and farrowing cages laid down in the Animal Welfare Act (693/2023, 121 § and 122 §). Welfare-related investments appear to be a growing share of supported investments (Maa-ja Metsätalousministeriö, 2024).

Co-operation, knowledge exchange and dissemination of information

The improvement of animal welfare is explicitly mentioned as one part of the counselling instrument ((EU) 2021/2115; Art. 15 point 2), which is financed by the agricultural fund of the EU. In Sweden, animal welfare is included in the measures for cooperation ((EU) 2021/2115, Art. 77). This instrument is not targeted for animal welfare in Finland. By promoting the spread of knowledge, collaboration, and innovations around animal welfare, these interventions contribute to achieving the goal of better animal welfare (Regeringskansliet, 2023). This instrument includes collaborative efforts for increased competitiveness and animal welfare, transnational cooperation can also be included (Regeringskansliet, 2023).

Similarly, animal welfare is included in the intervention for competence development ((EU) 2021/2115, Art. 78) in Sweden. Good welfare contributes to healthy animals and provides conditions for reduced antibiotic use. This, in turn, provides conditions for increased production with good quality, thereby strengthening competitiveness. This instrument also includes continuing education and support for advisors within industries (Regeringskansliet, 2023). Actors who carry out competence development within the measure must be independent and have no conflicts of interest. This is ensured by requiring the independence of contractors in the procurements and calls for tenders within the measure (Regeringskansliet, 2023).

Animal welfare and health advisory services are also subsidised in Finland through knowledge exchange and dissemination of information instrument ((EU) 2021/2115, Art. 78). Subsidised farm advisory services in Finland can include fighting antibiotic resistance, guidance for animal welfare payments, promoting animal welfare and developing farm operations, animal health care plans, biosecurity measures against contagious animal diseases, complying with animal health regulations and conditionality, and guidance for investments to improve animal welfare (Maa-ja metsätalousministeriö, 2022).

Earlier, it was clearly stated that Member States should ensure that counselling and inspections remain clearly separate from each other, advisers should still report if Union law or national laws have been seriously violated ((EU) 1306/2013 (repealed), 10. recital, 12. recital and Art. 13, point 2). The current act states that advisers should not have conflicts of interest ((EU) 2021/2115; Art. 15 point 3). To the author's knowledge, there are no rules stating that advisers should report if Union law is violated, and thus these instruments are not connected to conditionality. However, in Finland, anyone who observes that an animal is sick, suffering, or otherwise helpless, has an obligation to help, inform the owner, or report to the authorities (Finnish Animal Welfare Act (693/2023), 7 §). In Finland, official veterinarians may also act as farm advisors.

Controls on animal welfare and associated subsidies in Finland

According to Article 138 of the Official Controls Regulation (OCR, (EU) 2017/625), when non-compliance is detected, the authority should apply appropriate control measures to ensure that non-compliance is rectified and further non-compliance is prevented. To ensure compliance, Member States implement official controls and the European Commission conducts regular audits: Directorate-General for Health and Food Safety for animal welfare (2017/625, Art. 116) and the European Court of Auditors for subsidies paid under the CAP (Financial Regulation, (EU, Euratom) 2018/1046).

The Horizontal Act (EU) 2021/2116, in turn, establishes rules concerning the financing of CAP expenditures and related administration and control systems. When non-compliance is detected in SMRs, farmer's subsidies can be reduced. Controls on conditionality are not part of the official controls under the OCR. However, Member States can integrate these controls, and the paying agency can transfer the responsibility for control of the subsidies to the competent authority responsible for official controls (European Court of Auditors, 2018).

National legislation may also regulate administrative procedures, including controls and associated measures. In Finland, administrative procedures must follow the rules of the Finnish Administrative Procedure Act (434/2003). When non-compliance with animal welfare requirements is detected, parallel administrative procedures may occur in both animal welfare and subsidy systems, and potentially criminal procedure may be carried out simultaneously, all by different authorities (Figure 1).

In Finland, farm controls for the conditionality of animal welfare are conducted by official state veterinarians. Farm controls are based on sampling, part of the sample is based on risk factors, and the other part includes randomised sampling of all farms (Finnish Food Authority, 2025). In addition, animal welfare

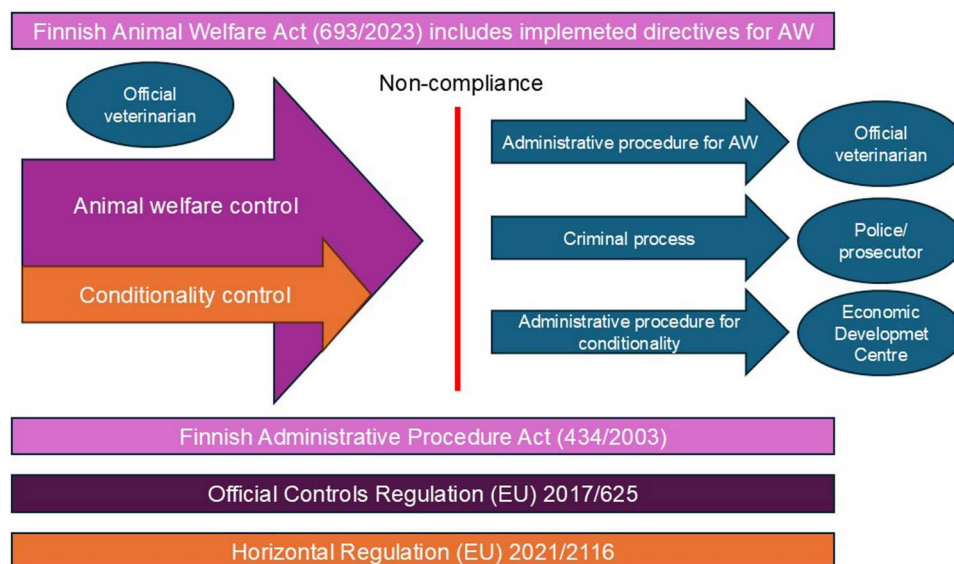


Figure 1. Relationship between official animal welfare (AW) controls and conditionality. From each non-compliance, three different processes may arise, each conducted by different authorities and based, at least partially, on different provisions of national and EU legislation.

controls are conducted based on sampling for national animal welfare control by official state veterinarians as well as on suspicion of animal welfare infringement by local official veterinarians. Conditionality is also supervised by official state veterinarians based on farm inspections carried out by local official veterinarians as administrative controls from inspection reports. If non-compliance of SMRs that are part of conditionality is noticed, the inspection is expanded to control for conditionality, either on the spot or from documents, depending on the authority which conducts the inspection (Finnish Food Authority, 2025). Local official veterinarians are not authorised to supervise conditionality, but the official state veterinarians are.

Controls on animal welfare occur at three levels: the minimum level based on directives (SMRs), the minimum level based on national legislation, and the enhanced level of animal welfare, supported by animal welfare payments and investment subsidies (Figure 2). The two minimum levels could together be called the basic national level because national legislation in Finland sets higher standards for animal

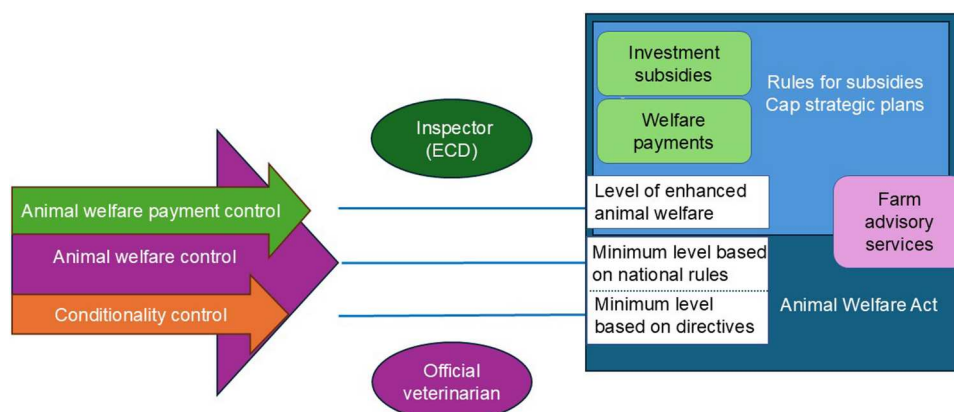


Figure 2. Three different levels of animal welfare (indicated by blue lines) that are supervised in Finnish farms by official veterinarians or inspectors of Economic Development Centers (EDCs). The lowest two levels are defined in the Finnish Animal Welfare Act and apply to all farmers. The level of enhanced animal welfare applies to farmers who receive voluntary subsidies.

welfare than the SMRs. These different levels of animal welfare are supervised by several authorities and are based on different legislative rules which overlap. Animal welfare is supervised by official veterinarians based on the Animal Welfare Act (693/2023, 71 § and 74 §). Welfare payments and investment subsidies are granted and supervised by the Economic Development Centers according to national legislation (1334/2022, 7 §). Farm advisory services constitute another type of instrument that helps farmers comply with the required level of animal welfare according to their needs and preferences. Support for Farm advisory services is also granted and supervised by Economic Development Centers (1334/2022, 7 §).

An example of different levels of animal welfare is presented in Table 3 using dairy cattle as an example. Based on the directive, they can be tethered continuously if it does not cause unnecessary suffering. In Finland, dairy cows and heifers kept for milk production in tie stalls must have access to the outdoors for 60 days and a certain area for moving. To obtain welfare payments, the farmer must let the cows outside for a longer period than required by Finnish animal welfare legislation.

Discussion

The role of conditionality for supporting animal welfare

Improving animal welfare is often related to farmers’ financial resources. Agricultural subsidies in various forms can help achieve these goals (Adams et al., 2025). Failure to comply with the support conditions causes financial losses for the producer and thus weakens the producer’s financial opportunities to take care of animal welfare (Brennan et al., 2021). Animal welfare as an object of CAP has also been questioned (Heinemann, 2017). Even though there are instruments affecting animal welfare, the conclusion of the European Commission (2022a) was that the overall effect of CAP on animal welfare was not significant. Some of the other goals of CAP, such as intensification of production, have also been recognised as contradictory regarding animal welfare (Grethe et al., 2018).

When the principle of cross-compliance was introduced and animal welfare SMRs were included in the evaluation in 2003, the aim was to improve compliance with animal welfare legislation (Horgan & Gavinelli, 2006; Ludwig & O’Gorman, 2008). However, cross-compliance was not as effective a tool for improving animal welfare as expected (Ryland, 2015). An audit conducted by the European Court of Auditors (2018) in five member states found that cross-compliance generally covered essential animal welfare requirements, but deficiencies in the performance of inspections were found. The penalty system of cross-compliance was considered too mild, as it did not ensure that the penalties were proportionate to the seriousness of non-compliance (European Court of Auditors, 2018). Currently, there is limited evidence regarding the impact of CAP on animal welfare in the era of conditionality.

Grethe et al. (2018) suggest the gradual discontinuation of binding direct payments to other regulations and shifting towards a system where subsidies are based on public services, which include animal welfare. Based on the legal analysis of this study, the model of conditionality warrants critical assessment, as it adds to the administrative complexity, especially in countries with higher animal welfare standards.

Table 3. Example of three different levels of welfare in dairy cattle in Finland.

Directive 98/58/EY, Annex, point 7. Freedom of movement	
Minimum level based on directives	The freedom of movement of an animal, having regard to its species and in accordance with established experience and scientific knowledge, must not be restricted in such a way as to cause it unnecessary suffering or injury. Where an animal is continuously or regularly tethered or confined, it must be given the space appropriate to its physiological and ethological needs in accordance with established experience and scientific knowledge.
Finnish Government Decree on Protection of Cattle (2010/592), amendment (1162/2023) 7 § Grazing and walking	
Minimum level based on national legislation	Dairy cows and heifers kept primarily for milk production, which are kept tethered, must be allowed to pasture or other suitable walking space for at least 60 days during the calendar year, during the period starting on 1 May and ending on 30 September, and for at least 30 days at other times deemed appropriate. The walking space must have an area of at least six square metres per head of cattle kept there. However, the area must always be at least 50 square metres.
Finnish Government Decree on welfare payments (1381/2022) 16 § Outdoor exercise for cattle	
Enhanced level of welfare	The measure concerning outdoor exercise of cattle shall be implemented for all cattle on the farm that are at least six months old. The aforementioned cattle shall be allowed to exercise outdoors for at least 120 days. Records of outdoor exercise shall be kept.

The role of voluntary subsidy instruments in promoting animal welfare

In the Finnish CAP Strategic Plan 20, animal welfare interventions were identified, and in Sweden, five. The Finnish count differs from the report by Godfroy & Muro (2025), who reported Finland having 25 schemes, which includes five schemes of Åland Island excluded from this study. According to Godfroy and Munro (2025), Finland has the highest number of schemes referring to animal welfare compared to other Member States.

The differences between Finland and Sweden in utilising different subsidy instruments may reflect different needs for improving animal welfare. Although the culture and structures for farming in Finland and Sweden are quite similar, Swedish animal welfare legislation sets higher standards than the Finnish legislation. For example, in Sweden, the construction of new tie-stall barns has been prohibited since 2008, and castrating piglets without analgesia and local anaesthesia since 2016 (Lundmark, 2016). In Finland, the construction of new tie-stall barns and castration of piglets without analgesia was allowed until the Animal Welfare Act 693/2023 came into force on 1 January 2024. However, investment subsidies for new tie-stall buildings have not been granted in Finland since 2020 (Government Decree 751/2020).

Finland spent the second highest amount of funding on animal welfare measures during the 2014–2020 funding period, and Sweden was ninth (European Court of Auditors, 2018). During the previous funding period, not all Member States supported the animal welfare measures in their rural development programs. During the current period, 27 Member States provide specific support for higher levels of animal welfare, which indicates the strengthening importance of these support instruments (European Court of Auditors, 2018; European Commission, 2023b; European Commission, 2023c). The same instruments were available for improving animal welfare during the previous program period (Bergschmidt et al., 2021; European Commission, 2022a).

Animal welfare payments aim to improve animal welfare, which corresponds to societal expectations. Both Sweden and Finland are considered countries that value animal welfare and have high welfare standards. However, it can be questioned whether the differences in their CAP Strategic Plans mirror the higher need for animal welfare payments in Finland due to lower standards than Sweden, or whether the difference between political approaches arises from different values rather than needs.

Welfare payments have also been criticised. Their use and budgets vary across Member States, and shortening the commitment periods from the prior five to seven years to the current one year has been considered to risk the goals for long-term animal welfare enhancement (Näsström, 2016). Moreover, empirical evidence on the effectiveness of CAP animal welfare schemes or cross-compliance in maintaining or raising animal welfare levels remains limited (Buller et al., 2018).

The European Court of Auditors (2018) identified the so-called deadweight risk in farm subsidies, referring to situations in which the farmers would have carried out the measures even without the support, for example as part of normal agricultural practices or industry's quality schemes (European Court of Auditors, 2018). This concern is supported by a recent study from Sardinia, in which approximately 60% of farmers responded that committing to welfare plan resulted in little or no change in their farm management practices, while around 30% adopted some new practices and less than 10% made major changes (Pulina et al., 2022).

According to the European Court of Auditors (2018), the Commission lacked sufficient information on both the expected or actual results and effects of the rural development funds allocated to the promotion of animal welfare. Available indicators were insufficient to assess the impact of funding allocated to subsidies promoting animal welfare for the years 2007–2020. Nevertheless, the European Court of Auditors concluded that EU measures contributed to improved compliance with animal welfare requirements and supported practices with animal welfare beyond the basic level. In line with these findings, Godfroy and Munro (2025) recommend developing proper qualitative and quantitative indicators for monitoring animal welfare objectives of CAP.

In Finland and Sweden, welfare payments are granted under Article 70 of regulation (EU) 2021/2115. Animal welfare can also be supported using the so-called eco-schemes under Article 31 of the same regulation, which are in use in some Member States (European Commission, 2023c). When using either of the instruments, the Member State must present a list of favourable agricultural practices, where animal welfare must go beyond the level of SMRs and the level of national legislation in their CAP Strategic

Plans ((EU) 2021/2115, Art. 12). This offers flexibility for Member States to utilise different instruments, but in Member States with higher national animal welfare legislation, this also restricts the options available for subsidies and thus creates an imbalance between Member States. It could be argued that more benefits for animal welfare could be accomplished by promoting welfare payments in Member States that still have national legislation at the level of directives (Näsström, 2016).

In Member States, where the national rules for animal welfare go beyond SMRs, farmers are in unequal positions with fewer opportunities to utilise funding for animal welfare improvement than in Member States, where the national requirements for animal welfare are lower (Lundmark, 2016). According to Näsström (2016), this imbalance may lead stricter Member States to either lower their regulatory level or their farmers to be priced out of the market. Voluntary subsidies targeted at animal welfare may also help in competing in EU markets against cheaper imports because they have the potential to even the gap between production costs (Näsström, 2016; Beck et al., 2024). The requirement that voluntary subsidy instruments may only support measures exceeding national legislation may have the unintended consequence of discouraging the adoption of higher national animal welfare standards, as stricter national welfare rules would reduce the number of subsidy instruments available in those Member States.

EU subsidy instruments can also be used to support education and guidance. Information and education are at the forefront of the Swedish CAP strategy, and in Finland, the instrument is used in the form of farm advisory services. Education and information measures can be implemented with moderate administration and are thus regarded as cost-effective compared to traditional regulative control; moreover, education and advice activities form the basis for effective enforcement (Scott, 2017; Grethe et al., 2018). Providing information can be financed by both the Agricultural Support Fund and Rural Development Fund ((EU) 2021/2116, Art. 7). Raising awareness of the content and goals of the CAP, including animal welfare, has also been mentioned as one of the goals of communication support intervention ((EU) 2021/2116, Art. 46). The purpose of these instruments is to provide uniform, evidence-based, objective, and comprehensive information.

There are also other rural development measures under pillar II, such as subsidies for farm investments, quality systems, and organic farming schemes, which can influence animal welfare (Ryland, 2015; European Court of Auditors, 2018). Modernising animal housing systems and management practices has the potential to improve animal welfare. In general, investment in animal production technologies is considered to result in better animal welfare (European Commission, 2014). The European Commission (2023c) has estimated that under the current period, Member States' CAP strategies prioritise the growth and application of new practices and technologies, which will lead to the modernisation of farms and, thus, to enhanced animal welfare. Investing in housing systems does not necessarily improve animal welfare. In Germany, it was found that after subsidised investment in new housing systems, in dairy farms the animal welfare was mainly improved, but in 40% of pig stables, welfare worsened (Bergschmidt & Schrader, 2009). In Finland, investment subsidies are utilised more often by farms that are more profitable than average, which reflects the capital-intensive nature of farming. All farms have resources for a self-financing share (National Audit Office of Finland, 2024). In a recent report from Finland, animal welfare investments were considered the most impactful intervention for supporting animal welfare (Väre et al., 2025).

Better implementation could reduce the imbalance between Member States

The implementation and enforcement of current animal welfare rules is not as good as it could be in Member States (European Court of Auditors, 2018; Council of the European Union, 2019; Vogeler, 2019). The European Parliament, European Commission, and Council of the European Union have all recognised the lack of enforcement of EU legislation, which represents one of the main problems affecting the welfare of animals and indicates that a better understanding of the rules is required as well as more comprehensive legislation (Council of the European Union, 2019).

Poor enforcement may be due to several factors, including the knowledge of farmers and resources of authorities. For example, systematic tail-docking of pigs still occurs in many Member States, despite being prohibited in the directive, unless other preventive measures are taken (de Briyne et al., 2018; European Commission, 2023c). Painful tail-docking is carried out to prevent tail biting, which is a common welfare and food safety problem in pigs (de Briyne et al., 2018). However, tail biting is an indicator of underlying

animal welfare problems, such as a lack of environmental enrichment (de Briyne et al., 2018). According to an Italian study by Menegon et al. (2025), rearing pigs with intact tails was 33% more expensive during weaning and 7.4% during fattening in terms of production costs. In the EU, the ban on trimming pig tails is fully implemented in Finland and Sweden, where pigs are also offered enrichment material as a rule (European Court of Auditors, 2018). The Court of Auditors (2018) found non-compliances in several farms in Romania and Germany (Nordrhein-Westfalen), where pig tails were trimmed and pigs did not have access to legally required enrichment material, even though the inspected farms received rural development support specifically targeted at promoting animal welfare.

The provisions of the national legislation apply to all farm animals, but for subsidy recipients, infringements may affect the subsidies, and thus, there is an economic incentive to comply with the requirements. Additionally, the risk of being monitored through the subsidy system is greater than that for farms not receiving subsidies. Intensive indoor farming systems in some Member States are not subject to conditionality, because they do not receive relevant subsidies (European Commission, 2022a; Godfroy & Muro, 2025). There is a need for both national and EU-level regulations to keep all farm animals under the control of animal welfare legislation, regardless of whether the farmer receives subsidies.

Currently, animal welfare directives set the minimum level of harmonisation. However, both the findings of this study and the analysis by Godfroy and Munro (2025) suggest that raising the level of EU animal welfare standards would be necessary to achieve the objectives of improving animal welfare and reducing the administrative burden. Further harmonisation of both animal welfare legislation and its implementation across Member States could help even the level of animal welfare and, thus, fairness of trade between Member States.

The European Commission has initiated a revision of the EU animal welfare framework, and it has been noted that the challenges identified in improving animal welfare are not always targeted by Member States with CAP instruments (European Commission, 2022b). The findings of this study further indicate that common EU-level animal welfare legislation has the potential to reduce the complexity of the system while contributing to a higher level of animal welfare. In this context, it is essential to consider how animal welfare support instruments function in relation to the reformed legal framework across the EU.

A shift towards directly applicable EU legislation without the possibility of higher national welfare rules includes the risk of lowering animal welfare standards in Member States that currently exceed minimum requirements under the existing directive-based framework that allows national derogation for stricter rules (Näsström, 2016). At the same time, Member States with animal welfare legislation that implements the directives at their basic level can have an advantage in common markets because they may spend less money on animal welfare compared to Member States with stricter national legislation that goes beyond the SMRs set by directives (Näsström, 2016). Minimum harmonising directives have allowed Member States to use stricter rules, which has benefitted animals in these countries (Näsström, 2016). The use of maximum harmonising directives or regulations could elevate the level of animal welfare in general but also includes the risk of lowering animal welfare in some Member States (Camm & Bowles, 2000).

Higher levels of animal welfare and complexity of controls

Official animal welfare controls on farms are essential for the enforcement of animal welfare legislation (Väär-ikkälä, 2021). The starting point for official controls of Animal Welfare has been the assumption that a good level of welfare is achieved if SMRs are respected (Veissier et al., 2021). In Member States such as Finland and Sweden, where national animal welfare standards are higher than requirements set at the EU level by directives, supervision for conditionality leads to official controls, where both national and EU requirements are supervised simultaneously (Figures 1 and 2). In France, for example, official animal welfare controls include only the SMRs derived from directives (Veissier et al., 2021).

An example of a situation in which all national animal welfare requirements are not based on EU directives is provided by the Finnish Animal Welfare Act (693/2023, 33 §), which requires that all animals kept in the same enclosure must have the opportunity to rest at the same time. The requirement does not derive from Directive 98/58/EC concerning the protection of animals kept for farming purposes, and thus is not an SMR for adult cattle. For calves, however, the requirement falls within the scope of the SMRs because it is derived from Directive 2008/119/EC laying down minimum standards for the protection of calves,

which states that the accommodation for calves must be constructed in such a way as to allow each calf to lie down, rest, stand up and groom itself without difficulty (Annex I, point 7).

The relationship between SMRs and the requirements of national welfare legislation within conditionality is not always clear. Article 12 of (EU) 2021/2115 states that SMRs shall apply in the case of directives as implemented by the Member States. This principle governs conditionality controls. However, in the case of voluntary support instruments, the level that must be exceeded is the level set in national legislation, including the requirements that go beyond directive-based minimum standards ((EU) 2021/2115, Art. 31 & 70). This demonstrates the complexity in practice: during inspections, some indicators correspond to conditionality requirements, while others fall outside the scope of SMRs. Non-compliance with the former may result in a reduction in subsidies under conditionality, whereas non-compliance with the latter does not affect the payments under conditionality. In contrast, if the farm has received support under Pillar II instruments, there can be a reduction in subsidies if national legislation is not complied with, whether the requirement arises from the directives or not.

Combining the supervision of both national and SMR requirements forms a matrix-like structure, which is more complex in countries where animal welfare is regulated beyond the SMR level. The supervision of animal welfare is implemented at three levels: SMR level, national legislation level, and welfare payments level, all of which follow partly different rules supervised by partly different authorities. In addition, there are various paths of procedures (administrative for animal welfare compliance, administrative process for recovery of subsidies, and criminal process) when non-compliance in animal welfare is detected, as illustrated in Figure 2.

Supervision by many authorities is a recognised weakness of the Finnish system and the farmers have perceived supervision as difficult to comprehend (Henttu et al., 2017). OECD (2014) has recommended that whenever there are several competent authorities, the work should be coordinated and all relevant information, including annual control plans, should be available for all. The local administrative level has been recognised as having the most impact on the practical implementation of regulation (European Commission, 2025). The European Court of Auditors (2018) highlighted that good coordination between official controls and controls for conditionality makes them more efficient by creating economies of scale and avoiding overlaps, but it also helps detect non-compliance more effectively. Furthermore, a consistent approach to animal welfare controls provides more clarity for farmers and higher incentives to meet applicable standards (European Court of Auditors, 2018).

The challenge of reducing complexity

Finland recognises that the Finnish CAP strategy is complex and that reducing the administrative burden is challenging (Maa-ja metsätalousministeriö, 2022). In Sweden, the conclusions in the CAP strategic plan regarding reducing the administrative burden are similar; the risk remains that the overall administrative burden will remain or even increase. In addition, the design of conditionality is recognised as a factor that increases the administrative burden. It is important that the administrative burden is carefully followed and that simplification continues (Regeringskansliet, 2023). However, the development of administrative burden can be explained by legitimate underlying factors, as efforts to better target interventions and respond to diverse stakeholder needs have led to a broader and more tailored set of policy measures (Tanskanen, 2019).

Reducing the administrative burden of CAP has been a long-term goal of the EU (Commission of the European Communities, 2005; (EU) 2021/2115, Art. 6 point 3). The European Court of Auditors (2008) remarked that cross-compliance management and control systems could be simplified. Since then, the SMRs have been reduced. The effects of the reductions for the previous program period were not perceived as significant by producer organisations, advisory service bodies, or paying agencies, but the rules were considered even more complicated than before (European Court of Auditors, 2016).

The simplification of CAP has been recognised as difficult because agriculture and rural policies are by nature complex, dealing with both the internal and external policies of the Union (Commission of the European Communities, 2005; Ludwig & O’Gorman, 2008). Kuhmonen (2018) argues that complexity and administrative burden arise from the fact that the problems CAP aims to resolve are wicked. Since the CAP measures are based on mandatory administration, reducing bureaucracy is difficult. However, the role of

the administration is to follow the use of taxpayers' money. Efforts have been made to reduce the administrative burden on operators by increasing electronic transactions and simplifying and harmonising support conditions (Maa-ja metsätalousministeriö, 2022).

Extensive regulation and bureaucracy have a negative impact on farmers' commitment and the attractiveness of agriculture (Kuhmonen, 2018). In addition to utilising different instruments available to enhance animal welfare, the comprehensibility of the system and efficient, understandable, and transparent supervision are key elements in reaching the goals set for agricultural support system. Reducing administrative burden not only means deregulation but also better regulation, which is, among other things, clear and understandable (OECD, 2014).

Clear differentiation between animal welfare instruments currently under Pillar I, which requires the basic level of complying with SMRs, and Pillar II, which supports animal welfare at a higher level than required by SMRs, could simplify the whole. Pillar II has been considered to have a wide range of opportunities to support more sustainable farming, including animal welfare that goes beyond SMRs, but the use of instruments of Pillar II requires will from a Member State, as noted by Westhoek et al. (2012) in their analysis of the previous program period. Especially in Member States with animal welfare requirements that exceed those laid down in Union legislation, the clear articulation of the levels – minimum level set by the Directives, minimum level set by national legislation, and enhanced level of animal welfare supported by welfare payments – could help farmers to act and comply with the level they select. The planned merging of the current pillars (European Commission, 2025) also provides an opportunity to clarify the aims and level of animal welfare pursued by each instrument.

Future development of farm animal welfare regulations

Finally, the article discusses two current policy debates: animal welfare labelling and the use of animal-based indicators in welfare controls and explores their potential implications for the control system. The long-discussed EU-regulated animal welfare label has the potential to make different levels of animal welfare transparent to consumers, thus promoting animal welfare through consumers' informed choices (Ryland, 2018). There are already a variety of private labels and industry quality schemes, which add to the administrative burden on farmers (Voegler, 2019), but consumer willingness to pay for higher animal welfare may be limited (Kühl & Schütz, 2024). Leone (2020), however, sees that labelling has the potential to overcome shortfalls of the CAP regarding animal welfare by promoting the development of both public and private standards, and strengthening the role of customers. The variability between Member States in their level of animal welfare regulation also affects the emergence of welfare labels. Typically, in countries with lower legislative requirements, there is room for market-based welfare standards, which may also indicate the inability of policymakers to respond to societal demands (Voegler, 2019). There has been debate as to whether labelling is better organised through the private or public sector (Leone, 2020). Ideally, information from private inspections could be used on risk-based annual control plans for official controls, thus resembling real co-governance, which could reduce the administrative burden on both farmers and authorities.

Following the evaluation of the effect of CAP on animal welfare during the previous program period, the European Commission recommended determining suitable animal-based indicators to enhance animal welfare under CAP (European Commission, 2022a). Despite years of research, animal-based indicators have not yet been integrated into official controls (Jacques, 2014; Bergschmidt et al., 2021). There are still limitations to the use of animal-based indicators as a basis for subsidies, including their time-consuming nature and the limited availability of reliable data available from registers and, for example, from test milkings (Bergschmidt et al., 2021). The use of animal-based indicators would require new competences from supervising authorities as well as from farmers (Keeling, 2009; Roe et al., 2011). Their wider adoption in official controls would also require changes to EU legislation. However, there are elements of animal-based measures already in Sweden's CSP, where the body conditioning score is one element in welfare payment for pigs and sheep (Table 2). Currently, not all welfare problems are covered by official controls. As some health problems affecting animal welfare, such as lameness, and mastitis under treatment are not addressed by official controls (Lundmark Hedman et al., 2018), the use of animal-based indicators could support animal welfare controls by providing a more outcome-oriented perspective.

Conclusions

Conditionality can be viewed as a compulsory animal welfare instrument that binds the minimum level of animal welfare to many subsidies paid under the CAP in all Member States. In addition, there are several voluntary instruments that member states can include in their CAP Strategic Plans to support animal welfare. In Finland, the voluntary animal welfare instruments described in the CAP Strategy Plan were animal welfare payment, investment support, and support for farm advisory services. In Sweden, in turn, the instruments were animal welfare payment and support for farm counselling and competence development. There were differences in the implementation of animal welfare payments, and different legal basis for instruments used for farm consulting. The higher national animal welfare standards have some effect on how voluntary instruments can be utilised compared to Member States with lower level of animal welfare.

Finland and Sweden serve as examples of how different Member States can utilise CAP instruments to support animal welfare. The European Commission (2022a) concluded that CAP instruments play a role in a holistic approach to animal welfare. The selection of effective policy instruments depends on the existing level of animal welfare, as illustrated by Ingenbleek et al. (2012) through a policy tree, which also encompasses policy instruments beyond CAP. The pathways of the policy tree are in line with the current situation in Sweden and Finland, which may lose compatibility in markets because of higher animal welfare and its costs. This underlines the need for the wide use of instruments to support both compatibility and animal welfare.

Resource-wise utilisation of various instruments available for enhancing animal welfare; comprehensibility of the system; and efficient, understandable, and transparent supervision are key elements in reaching the goals set for the agricultural support system. Systemising the legal framework and instruments that aim to improve animal welfare may help policymakers and authorities understand the matrix-like structure and identify the points where the system might be simplified and the administrative burden reduced. A clearer system would also help farmers comply with the rules and improve the implementation and supervision.

Future revision of Union animal welfare legislation, planning of future CAP programs, and national legislation should be prepared with the aim of improving animal welfare and reducing administrative burden in the centre. Accomplishing these aims requires balancing, because ensuring a sufficient level of animal welfare requires a certain administrative burden. Article 13 of the Treaty on the Functioning of the European Union commits Member States to pay full regard to animal welfare when formulating and implementing policies in agriculture. This obliges Member States to consider animal welfare not only when implementing directives in domestic legislation but also when implementing Union policy.

Further research is needed on the effectiveness of various subsidy instruments on animal welfare and on how administration can be organised to best support animal welfare while avoiding unnecessary administrative burden. In particular, longitudinal studies that evaluate animal welfare before and after the intervention would be valuable. If the intervention has no effect on animal welfare, its use should be critically evaluated to reduce the administrative burden. The Member States' strategic CAP plans have a wide range of variations, and sharing knowledge about effective measures would be helpful when planning upcoming periods of CAP.

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