September 2026

EDA Reply to the TRIS notification from Italy on the Regulations governing the 'National Quality System for Animal Welfare – SQNBA'

The European Dairy Association (EDA) has taken note of the TRIS Notification of the Italian Regulations governing the '**National Quality System for Animal Welfare – SQNBA**' pursuant to Article 224-bis of Decree-Law No. 34 of 19 May 2020, and operational procedures for the management and approval of certification requirements (specifications) for free-range fattening pigs and cattle (2026/0313/IT).

EDA fully supports high animal welfare standards and recognizes the importance of initiatives aimed at improving animal welfare, reducing the use of antibiotics and **increasing transparency** for consumers in this area. EDA therefore supports the objectives pursued by the Italian authorities through the SQNBA system.

However, EDA has concerns regarding certain aspects of the proposed framework, in particular the conditions for participation in the system by operators established in other Member States. As currently designed, the measure could **create significant barriers to participation** for operators from other Member States and, consequently, have an impact on the functioning of the EU internal market.

In this regard, EDA would like to highlight the following key points:

1. Potential impact on intra-EU trade and the internal market

Italy is an important market for the European dairy sector, and dairy products are widely traded between Member States. Measures relating to animal welfare certification and labelling should therefore be designed in a way that does not create unjustified barriers to intra-EU trade or discriminate against operators established in other Member States.

Article 1(1) of the Decree provides that participation in the SQNBA is voluntary and that "access is guaranteed to all operators from EU Member States with a legitimate interest." However, the Decree does not establish sufficiently clear requirements or procedures for participation by operators not located in Italy.

EDA is concerned that the practical requirements for participation in the SQNBA system could result in **operators from other Member States being placed at a disadvantage** compared with Italian operators, particularly where equivalent or higher animal welfare standards are already applied and certified in their Member State of establishment.

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In the absence of effective recognition mechanisms, the SQNBA requirements may restrict market access for products lawfully produced and marketed in other Member States.

More broadly, EDA considers that a strategic and systemic assessment should be carried out of the effects of the SQNBA on the activities of Italian operators, particularly in relation to the principle of free movement of goods bearing equivalent certifications or animal-welfare claims originating from other Member States.

EDA recalls that, under Article 34 TFEU, national measures should not create unjustified obstacles to market access for products lawfully produced and marketed in other Member States.

2. Recognition of equivalent systems and standards

EDA considers it important that the SQNBA framework provides for a genuine and effective possibility for operators from other Member States to participate where they comply with equivalent or higher animal welfare standards.

The mere possibility of continuing to use animal welfare schemes established in other Member States does not necessarily address this concern. In practice, participation in and recognition of the SQNBA system may be necessary for operators supplying the Italian market to benefit from the visibility and recognition associated with the national system.

The framework should therefore provide for the recognition of equivalent certified systems from other Member States, where they pursue the same objectives and provide comparable or higher levels of animal welfare assurance. EDA recalls the importance of the principle of mutual recognition within the Internal Market, according to which operators already complying with equivalent requirements in another Member State should not be subject to duplicative certification procedures without objective justification.

3. Practical and administrative barriers to participation

EDA is particularly concerned about the practical conditions attached to participation in the SQNBA system, including the requirement to use ClassyFarm and its connection with the Italian national database (BDN).

If access to the relevant databases and systems is not available to operators established in other Member States, or if existing certified systems cannot be recognized as an alternative, the possibility of participation may exist only formally while being difficult or impossible to achieve in practice.

Such technical and organizational requirements could therefore constitute a significant barrier to the participation of operators from other Member States, even where they already comply with equivalent or higher animal welfare requirements.

Particular concerns arise from the mandatory use of ClassyFarm and its links to the Italian BDN system. Operators and veterinarians established in other Member States may not have direct access to these platforms and may therefore be required to duplicate information already recorded in national databases or recognized certification schemes.

Data relating to animal welfare indicators, animal health and the use of antibiotics that are already collected through official national systems or recognized certification schemes should be accepted as equivalent wherever they provide comparable assurances.

Where technical interoperability is required, standardized interfaces and data exchange mechanisms should be made available to avoid unnecessary duplication of administrative procedures.

4. Recognition of certification bodies and professional qualifications

EDA considers that certification bodies accredited under applicable EU accreditation frameworks in other Member States should be able to carry out conformity assessments for SQNBA purposes without being subject to additional national approval requirements that would unnecessarily restrict participation.

Similarly, professional qualifications and animal welfare assessments carried out by veterinarians operating under recognized national systems in other Member States should be accepted where equivalent competence requirements are fulfilled.

5. Relationship with existing technical standards and voluntary certification schemes

A key aspect of the public regulatory system currently under development concerns its relationship with the technical documents and voluntary certification schemes issued by conformity assessment bodies (CABs) and already used by companies.

Article 224-bis of Decree-Law No. 34 of 19 May 2020 provides that the competent Ministries shall adopt one or more decrees aimed, inter alia, at defining the "procedures for the harmonization and coordination of authorized certification and quality systems."

Article 3(2), by providing that, where the information that the Decree seeks to regulate is already used under technical standards or voluntary certifications, the relevant procedures must be adapted, and Article 3(3), by excluding the need for adaptation for certain types of information, would appear, on a preliminary analysis, to assume that the technical standards and voluntary certifications currently in use will remain in place after the SQNBA enters into force, provided that they are appropriately adapted with regard to the requirements established by the SQNBA.

Under the transitional provision in Article 7, such adaptation must be implemented within 12 months from the date on which the certification requirements for each species enter into force. During this period, the technical standards and voluntary certifications used by operators will remain valid, although not yet adapted. Failure to make the required adaptations within the prescribed timeframe would, pursuant to Article 7(3), result in the information governed by the Decree no longer being permitted to be used under those standards or certifications.

Against this background, EDA considers that further clarification is required as to whether technical standards and voluntary certifications will continue to be recognized and may continue to be communicated alongside SQNBA certification, particularly in light of Article 8 on marketing and labelling.

The provisions governing marketing and labelling appear to give precedence to the indication of SQNBA certification and the related logo. It should therefore be clarified whether references to existing voluntary certifications may coexist in practice with the provisions of Article 8, or whether compliance with SQNBA requirements would instead preclude operators from communicating other certifications and animal welfare claims.

EDA considers that companies should retain the possibility to communicate additional factors and more ambitious animal welfare practices certified under voluntary schemes, particularly where such schemes have been established over time, provide additional assurances and are adapted to comply with the minimum requirements established by the SQNBA.

A system centered on the exclusive value of the SQNBA, even if organized into multiple levels, could otherwise make it impossible to recognize and communicate additional virtuous practices certified under voluntary schemes. This would risk undermining investments already made by operators in improving animal welfare and supply-chain practices.

6. Need for a proportionate and non-discriminatory approach

EDA recognizes that a common national system can play an important role in increasing transparency and consumer awareness of animal welfare. However, the design and implementation of such a system should be proportionate and should avoid creating unnecessary restrictions on the free movement of goods.

EDA notes that other national animal welfare schemes, provide mechanisms for recognizing operators and systems from other Member States. Such approaches demonstrate that ambitious animal welfare objectives can be pursued while maintaining realistic and non-discriminatory participation possibilities for operators established elsewhere in the European Union.

7. Importance of consumer recognition should not result in market barriers

EDA also acknowledges that consumers may be more familiar with a national animal welfare label than with schemes established in other Member States. However, this should not result in a situation where operators from other Member States are effectively unable to participate in the national system.

Ensuring a realistic and accessible possibility for participation, including through the recognition of equivalent schemes, would allow the objectives of the SQNBA system to be pursued while avoiding unnecessary distortions of competition and disruptions to the internal market.

Conclusion

EDA therefore calls on the Italian authorities to ensure that the SQNBA framework provides a **genuine, effective and realistically achievable possibility for operators established in other Member States to participate in the system**.

In particular, EDA considers that **equivalent animal welfare certification systems established in other Member States should be appropriately recognized**, including through suitable arrangements for access to and interaction with the relevant databases and IT systems. EDA further calls on the Italian authorities to introduce clear and legally certain mechanisms for the recognition of equivalent animal welfare schemes, databases, certification bodies and professional qualifications established in other Member States.

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Without such mechanisms, participation by operators established outside Italy risks remaining largely theoretical, thereby creating distortions in the Internal Market while providing no additional animal welfare benefits compared with already existing equivalent schemes.

Such an approach would allow the SQNBA to achieve its animal welfare and transparency objectives more effectively, while ensuring that the system remains **open, proportionate and non-discriminatory**, and avoids unjustified barriers to intra-EU trade and distortions of competition in the internal market.

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