

Members

Albania
Austria
Belgium
Bosnia-Herzegovina
Bulgaria
Croatia
Cyprus
Czech Republic
Denmark
Estonia
Finland
France
Germany
Greece
Hungary
Iceland
Ireland
Italy
Latvia
Lithuania
Luxembourg
Malta
Montenegro
Netherlands
North Macedonia
Norway
Poland
Portugal
Romania
Serbia
Slovak Republic
Slovenia
Spain
Sweden
Switzerland
United Kingdom

Observers

Armenia
Ukraine

Sections

UEVP
Practitioners

EASVO
State Officers

UEVH
Hygienists

EVERI
Veterinarians in
Education, Research
and Industry

FVE's input for the Revision of the Transport Regulation: 10 points

Adopted at the FVE GA in London, June 2022

FVE's recommendations to improve the EU animal transport law

FVE believes that a revision of the Council Regulation (EC) No 1/2005 on the protection of animals during transport is needed:

- To update the new legislation with the latest scientific evidence, including those on new and emerging technologies
- To rectify some welfare concerns regularly seen under the regulation;
- To simplify the rules for transporters and facilitate harmonised enforcement within to and from the EU.

As a **principle, animals should be transported as little as possible**, as any movement of animals is inherently stressful both with regards to the actual transport, but also with regards to removal from known surroundings and known peers to a new environment and potentially unknown handlers and other animals. Transport can lead to potential negative impacts on the health and welfare of animals, ranging from sensory stress, heat stress, to disease, injuries and even death. Transporting animals and mixing animals can facilitate disease transmission and negatively impact meat quality (e.g., more wounds, bruises, stress induced pale, soft and exudative meat, or dark, firm dry meat due to exhaustion).

FVE recognises that the length of journey is not the only determining factor. Multiple factors must be considered, including vehicle design, transport condition and space allowance, presence of conspecifics, driver skills, competence and contingency planning, watering and feeding intervals, quantity and quality of resting periods, veterinary surveillance of health and welfare, as well as end destination standards. The worse the conditions of the journey, the larger the potential negative impact. Lastly, moving towards less animal transport is beneficial for the environment and for sustainability, as recognised in the Farm to Fork Strategy. Underneath you can find **10 points the veterinary profession proposes to improve the EU transport rules** restating our long-held FVE position:

Animals should be transported as little as possible, reared as close as possible to the premises on which they are born and slaughtered as close as possible to the point of production.

President

Rens van Dobbenburgh

Vice-Presidents

Thierry Chambon
Siegfried Moder
Mette Uldahl
Stanislaw Winiarczyk

Introduction

Animal transport for various reasons has been on the agenda of the EU and the Member States for decades. Over that period, many EU studies have been carried out, reports produced, and rules and guidelines introduced on many aspects of animal transport, extra rules, committees, guidelines, etc were made. Publications have been done on many aspects of animal transport, analysing vehicle flooring, temperature, distance travelled, watering and feeding, etc. but did the welfare of animals during transport improved over the years? All transport, whether local, regional, national or long-distance international, causes stress and potentially impacts health and welfare. Multiple stressors are exerted when being exposed to various parameters of both physical and mental characteristics, such as sensory stress, prolonged hunger or thirst, heat or cold stress, and pathogenic stressors and these can lead to exhaustion, dehydration, immune system impairment, injuries, and mortality. For these reasons, the long-standing FVE opinion is that animal transport should be limited as much as possible.

Most long journeys which were controlled took place without any substantial animal welfare problems¹, but this just represents the tip of the iceberg as many animal transports will not routinely be assessed by enforcers. Commissions audits revealed that animal welfare problems during the transport of live animals in the EU are still a frequently recognised problem^{2,3}. Animal welfare has increased in societal importance over the years, with today's citizens being more attentive and demanding higher welfare standards. The public is increasingly aware of the risks associated with unsatisfactory transportation conditions and their direct links to animal welfare and public health concerns. Questions arise about whether transport can be justified where animal welfare is compromised (Fig. 1).

General

Should all long-distance transports be stopped in summer during heat waves?

Can rules just be tweaked to counter the most important welfare problems

or is a more drastic change needed?

What are the ambitions for the next decade,

towards more welfare friendly transport or less transport or both?

Environment/sustainability	Agriculture	Pet, sport and leisure
<p>Is long distance transport environmentally acceptable when trucks move all over Europe and often come back without animals?</p> <p>How can animal welfare, climate goal ambitions and sustainable farming in Europe combined best in the future?</p>	<p>Should animals be transported for long distances just to be slaughtered?</p> <p>Should young calves be separated from their mothers and transported to other countries to fatten them?</p> <p>Has specialisation gone too far, with some countries specialised in breeding, others in fattening and still others in slaughtering?</p> <p>Are there enough slaughterhouses left?</p> <p>Can mobile killing or slaughtering units better utilised to prevent transport of unfit animals?</p>	<p>How can the commercial transport of puppies and kittens and all other animals, for which no specific rules exist, be improved?</p> <p>How does repeated or circle-travels affect animals in the sport, breeding or show and circus industry?</p>

Figure 1. Ethical and welfare concerns within various industries involving animals and transport

¹https://ec.europa.eu/food/animals/animal-welfare/animal-welfare-practice/animal-welfare-during-transport/inspection-reports-eu-countries_en

²https://ec.europa.eu/food/audits-analysis/overview_reports/details.cfm?rep_id=137

³https://ec.europa.eu/food/audits-analysis/overview_reports/details.cfm?rep_id=136

Animal welfare issues have become intertwined with fundamental ethical and environmental questions: for which intended use can long-distance transport be justified?

If animal transport can be justified, FVE believes that the same animal welfare standards must apply for all transport purposes, including, but not limited to food production, breeding, sport and leisure. Species-specified conditions should always be met, and rules must be valid for all journeys regardless of their purpose as the implications for the animal are often the same.

Inspection quantity and quality for different types of transport should be risk-based as the definition of commercial, e.g. in connection with economic activity, is inconsistently applied and interpreted across various jurisdictions. Long journeys that are non-commercial should be equally subject to legislation. It is accepted that this requires a clear definition and a new set-up for control strategies as the current rules are lacking precision for the long transport of e.g. horses, companion animals, zoo animals and circus animals. Private citizens transporting their companion animals should be able to do so without having to obtain a transportation approval certificate.

FVE suggests that the distinction between commercial and non-commercial long journeys is removed from the transport legislation, as well as the distinction between registered and unregistered horses.

FVE's 10 points

1/ Update of journey criteria

A maximum journey time should be set for all animals. As a principle, long journeys (more than an 8-hour journey from start to final destination) should be avoided for all animals. Journey times must include loading and unloading in addition to the transport time without putting pressure on the time taken to catch, load and unload the animals. In addition, the time at the assembly point should be included in the journey time. The length of time, that is reasonable for animals to travel, depends on the animal species, age and type, the individual status and health condition of the animal, the type of route, the quality and condition of the vehicle, climatic conditions, etc. Decisions should be based on robust scientific and practical experience while taking care to avoid unintended consequences. Derogations with respect to maximum journey length may be necessary under certain exceptional circumstances and may be made for predefined and certified purposes by the official veterinarians, e.g., for rural and remote areas or where there are no slaughterhouses within an 8-hour distance or for animals transported in very high-quality transport conditions.

Detailed journey planning, contingency plans and their verification by additional technological means (GPS tracking, video surveillance) by an official veterinarian at the place of departure as well as at control points play an important role in

increasing compliance and protecting the welfare of animals during journeys. Veterinary verification of appropriate and complete journey plans is paramount for long journeys (e.g., space reserved at the control post for resting the animals and proper paperwork for the country of destination). It is particularly important to check the individual animals' fitness for transport before departure, along the journey and at arrival. The rules defining fitness for transport should be scientifically based and in a form which shall be understandable for the responsible and executing persons.

Due to regulatory pressures, the number of licenced slaughterhouses has decreased leading to a lack of available premises close to farms in certain areas. This is especially the case for specialist areas such as end of lay hens. Funding of and access to sufficient nearby slaughterhouses and more mobile slaughter units should be promoted, while ensuring high welfare and adequate food safety and meat hygiene standards in a One Health Approach. Emergency slaughter should always be performed onsite, and animals that are unfit for travel and/or slaughter must be euthanised without further delay or transportation.

Loading and unloading animals should be performed in a way that minimises stress and discomfort for the animals. For long commercial transports, particularly for slaughter animals, veterinary supervision and documentation of loading are recommended. This may be facilitated by video surveillance and animal welfare officers' inspections, where feasible.

2/ More vulnerable animals should be transported for a maximum of 4 hours

More vulnerable animals include, but are not limited to, the **young, old, pregnant, or immunocompromised (YOPI)**⁴. For example, young and unweaned animals must be handled during transport with utmost care and transported without undue delays. Dairy cows and breeding sows at the end of their productive life as well as those laying hens with poor skeletal health and pregnant animals in the last third of their pregnancy should not be exposed to journeys longer than 4 hours.

Currently, under Regulation (EC) 1/2005, only pregnant females for whom 90% or more of the expected gestation period has passed are considered unfit for transport. Transport of animals with limited fitness for transport, e.g., for treatment at a veterinary facility, or for slaughter at the nearest slaughter facility possible, should be restricted in duration and be subject to veterinary certification and potentially improved transport conditions, such as separate enclosures with extra bedding.

The rules of fitness for transport should be updated considering the latest fitness guidelines, particularly for YOPI animals.

⁴In human health, the term YOPI is widely used; it stands for Young, Old, Pregnant, Immunocompromised. This recognises especially vulnerable sections of the population which are more prone to developing infections because their immune system is either impaired or not fully developed yet or anymore.

3/ Space allowances should be updated based on the latest scientific evidence

Securing harmonised, adequate species-specific space allowance for individuals as well as for animals that are transported commonly in groups is paramount. Minimal space allowances should be species-specific, based on the number, weight, heights and statures of the animals and should depend on the functions the animals have to perform during the journey (drinking, feeding, resting, etc). Compartment height is also important and should be based on the tallest animal in the group. It should ensure sufficient headspace above the animals in their physiological position to allow adequate ventilation and temperature regulation, efficient removal of harmful gases (eg ammonia) and prevent injuries.

4/ Animal movements to and from non-EU countries should always be according to the EU Regulations

These transports should follow the above-mentioned journey times and official veterinarians must be able to verify the validity of the journey and contingency plans, the compliance with technical requirements and the actual welfare of the animals up to the final destination, including at resting points in transit, even if the final destination is located in the third country⁵. The handling authority is entitled to request the changes in the planning to obtain realistic and comprehensible information on current and future positions (e.g., via TRACES). The logbook must be correctly filled in up to the place of the first unloading in the third country⁶.

The establishment of an OIE transport contact points network and a web-based tool providing information to local authorities, together with a risk-based system for regular assessment of resting points outside the EU would be an asset.

No animal should be knowingly exported to a destination with unidentified welfare standards or exported to be raised in systems banned in the EU due to welfare considerations and neither should animal products from such animals be re-imported.

It should be verified that animals declared for breeding have as their final destination a valid, credible breeding facility/project. Though the transport operator is responsible for the accuracy of the designed journey, it is currently very difficult and sometimes impossible for official veterinarians to verify that the whole journey will comply with EU legislation for journeys ending in non-EU countries. Official veterinarians often cannot verify the feasibility of the journey plan, or if resting places have sufficient facilities where animals can be unloaded and be taken care of. Whenever possible, resting points within the EU should be given preference. A common database established by the European Commission

⁵Judgment of the Court (fifth chamber) of 23.4.2015, Zuchtvieh-Export v Stadt Kempten, C-424/13, ECLI:EU:C:2015:259.

⁶ Judgment of the court (third chamber) of 19.10.2017, Vion Livestock BV v Staatssecretaris van Economische Zaken (State Secretary for Economic Affairs, Netherlands), C-383-16, ECLI:EU:C:2017:783

of approved resting or supply facilities per species outside the EU should be made available for official veterinarians to be able to verify the validity of the journey plan.

The long-term goal should be to further reduce live animals being taken on long journeys and replace live animal transports by movements of carcasses and products of animal origin, and whenever possible, genetic material.

5/ Detailed rules should be set for the different species to be transported

Detailed rules should be set for different species including for the transport of dogs, cats and other species for whom specifications are currently not included in the Council Regulation (EC) 1/2005.

Transport vehicles should be fit for purpose, to ensure the health and welfare of all animals in transit during the full journey time, including loading and unloading. The use of cattle prods and other electrical herding devices must be banned. Species-specific requirements include: adequate ramps and flooring, a sufficient separation of animals to prevent injuries, ventilation adjustments, access to adequate feed and water, flooring and bedding – see good and better practices defined in the [Transport Guides Project](#).

Particularly unsanitary conditions and stress over long periods and in overcrowded compartments can increase disease susceptibility, including zoonoses and can lead to the mis- and overuse of antibiotics leading potentially to antibiotic resistance, with implications for both occupational health and public health. Cleaning and disinfection of the transport vehicle are key at the end of every journey before it is loaded with further animals.

FVE recommends that detailed requirements are laid down in tertiary legislation so that these can be adapted regularly and easier based on the latest scientific evidence. General principles need to be set out and must be respected where detailed guidance does not exist.

6/ Animals should be transported in thermal comfort conditions⁷

Heat or cold stress must be avoided for animal transport at all times. Therefore, animals shall travel in their thermal comfort zone. FVE acknowledges the wide range of temperatures experienced in EU countries during the different seasons. FVE recommends the conditions specified in the factsheets on extreme temperatures for [cattle](#), [horses](#), [pigs](#), [poultry](#) and [sheep](#) which were endorsed by

⁷Ideally, animals should be transported in their thermal comfort zone, the environmental temperature interval, where neither metabolic rate nor animal behaviour are activated in any way to keep body temperature within the normal range. The thermal neutral zone is a wider temperature interval, including zones where the animal has to adapt its metabolic rate or behaviour to keep body temperature within the normal range. Outside the thermoneutral zone, the animal no longer manages to cope via its metabolism or behaviour to keep its body temperature. See <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2004.44>

the EU Platform for Animal Welfare. This also includes the transport of vulnerable animals.

Under extreme weather conditions, the transport plan must be adaptable, e.g. animals could be loaded and unloaded in the less warm periods (early mornings). Delays at borders or due to traffic jams may increase the time where animals stay in overheated vehicles. Temperature sensors should be placed in critical positions and in the middle of the pens. Regulated forced ventilation is paramount for long-distance transport and vehicles travelling in warm outside temperatures. Journey authorisation shall be denied under forecasted extreme weather conditions. Factsheets on thermal comfort zones and extreme weather conditions for rabbits, companion animals and other animals transported would also be beneficial.

7/ Training provisions in the Regulation must be strengthened

A harmonised curriculum with learning objectives for transporters as well as those responsible for enforcing the Regulation should be introduced. Practical training, including understanding and assessing animal behaviour and assessment of transport fitness for the intended journey, must be a key part of any training. Recertification should be done every 3-5 years. Farmers transporting their animals to new pastures or short distances between farm premises may be subject to derogations.

8/ Implementation and sanctioning must be improved

It is imperative to implement the Regulation in a harmonised way across the Member States, as transit countries can only enforce the rules if the specifications are consistent. As the number and extent of controls differ per country, a more harmonised enforcement and sanctioning system should be adopted. A mutually recognised sanctioning system and penalties must apply for equivalent non-compliances. Enhanced communication between the Member States and follow-up on sanctions could improve enforcement. In addition, incentives should be implemented at all levels of the animal transport chain to foster transport operator and staff compliance.

Verification of journey logs, contingency plans and the transport vehicle by official veterinarians is key to ensuring welfare at transport, as it provides e.g. opportunity to amend, postpone or cancel journeys that do not meet the requirements and remove unfit animals. Verification and enforcement must be improved regarding checks on the journey logs and times; control must be improved and based on GPS tracking, video surveillance and inspections during loading and at control posts resulting in detailed, traceable reports to feedback to the official veterinarians who approved the journey logs initially. Such measures will improve the decision-making process by official veterinarians certifying upcoming transports under similar conditions.

Appropriate enforcement actions should be taken, including suspension of travel, delisting of transport vehicles/vessels, re-training of personnel involved in transport and prosecution as appropriate. Improved cross-border collaboration is

key to enhance verification and enforcement and must be a key aim of any revision of Regulation (EU) 1/2005, including initial and maintained certified training of all persons involved.

9/ Physical livestock markets should be replaced by digital market spaces

While recognising the social importance to rural communities, for the benefit of animal health and welfare, physical livestock markets should be phased out to the greatest extent possible. More stringent specific transport conditions, animal health and welfare guidelines and legislation, the presence of trained personnel and segregation of animals from strangers and crowds, and law enforcement at markets, must be recommended where they continue. Wherever the activity can be re-designed to minimise transport of animals for other purposes, this shall be encouraged.

10/ Transport of animals on long journeys by sea vessels must be phased out.

Transport of long journeys by sea vessels⁸, which is now mainly the case for sheep and cattle to third countries for slaughter must be phased out in this decade. Until this is achieved, reliable methods and better rules must be implemented and enforced to ensure the welfare of the animals up to the point of destination, including the verification of a contingency plan (which should include options if the vessel gets stuck or is not accepted at the final destination).

Important shortcomings were detailed in the recent DG SANTE unit F report⁹ in respect of transport via sea vessels, including the lack of centralised systems for granting approval of livestock vessels and transport operators because unsuitable and unsafe vessels are often used. Above all, heat stress, excessive loading density and non-functioning ventilation systems on livestock vessels lead to impaired animal welfare. Where sea vessel transport continues, technical aspects must be checked by a team of official veterinarians and sea vessel experts to grant approval. There is an urgent need to improve the legal requirements for vessels in the areas of ventilation, temperature control, pen construction, maintenance and drainage requirements. Enforcement of mirror clauses of EU legislation must continue up until the final destination and the slaughter of the animals in third countries.

Animal welfare officers are required on board under the supervision of independent veterinarians during these long sea transports and they must also report back in detail to the issuing competent authority afterwards.

⁸ This does not include Roll-on/roll-off ships (Ro-Ro).

⁹ <https://op.europa.eu/en/publication-detail/-/publication/fc8d71e4-93f5-11ea-aac4-01aa75ed71a1>

DISCLAIMER: This position paper addresses particularly commercial livestock movements by road and sea¹⁰, while touching on some other animal transports. For all transports, FVE supports a risk-based approach based on the status of the animal, the vehicle and the journey conditions in order to guarantee the best welfare of the animals transported.

¹⁰ In 2019, only 2% of animal transports were airfreight and concern mainly horses (breeding mares and competition sport horses) and poultry (hatching eggs, day-old chicks and standard chicks from a small number of companies specialising in genetic improvement).