



The Federation of Veterinarians of Europe (FVE) comments on the legislative proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of animals during transport and related operations, amending Council Regulation (EC) No 1255/97 and repealing Council Regulation (EC) No 1/2005.

The Federation of Veterinarians of Europe (FVE) welcomes this proposal, particularly after almost 20 years, aiming to update rules that no longer respond to modern realities, latest scientific advice, sustainability goals or societal demands. We specifically welcome expanding of EU rules for the transport of dogs and cats and the update of the annexes, such as on limiting journey length and space allowances based on scientific research.

FVE has held the long-standing position that animals should always 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.

No animal should be knowingly exported to destinations 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 imported into the EU!

If animal transport can be justified, FVE welcomes that rules for exports to third countries were tightened. 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.

Transport of long journeys by sea vessels, which is now mainly the case for sheep and cattle to third countries for slaughter must be phased out !

Until this is achieved, reliable methods and better rules must be implemented and enforced to ensure the welfare of the animals. The completed, signed, and stamped attestation set out in Annex IV by competent authority at the third country of destination transmitted to the competent authority at the place of departure is an important step in the right direction. To enhance enforcement, capacity building of the veterinary services including at border inspection posts and control posts must be strengthened.

Notwithstanding, the draft Regulation could be improved by clarifying some points and aiming at more coherence with already adopted regulations as outlined below:

Article 2

2.1 As laid down in recital (15), the scope of the regulation is limited to *‘the main species of animals transported within the Union and from the Union to third countries for economic purposes are vertebrate animals including small ruminants, equidae, bovines, pigs, domestic birds, rabbits, and aquatic animals, namely fish, cephalopods, and decapods. To ensure proportionality, the scope of this Regulation should be limited to those species.’*

→ We suggest adding this limitation directly to Article 2.1 to avoid misinterpretation, especially for animals used for scientific purposes (i.e. rodents).

2.2 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 to avoid misclassification and falsified documentation. Species-specified conditions should always be met, and rules such as on temperatures, feeding, etc must be valid for all journeys regardless of their purpose as the implications for the animal are often the same.

ALL ANIMALS DESERVE MINIMUM WELFARE PROTECTION DURING TRANSPORT

→ We suggest deleting subpoint (c) as the same minimum animal welfare standards must apply for all transport purposes

Article 3.15

We suggest amending to: ‘Animal welfare officer’ means an **INDEPENDENT** person directly in charge of the welfare of transported animals by livestock vessel for the duration of the journey at sea. Ideally, this animal welfare officer should be a veterinarian. They must be under the supervision of and formally report back to the transport operator’s dedicated central animal welfare officer, ideally a veterinarian, who directly reports to the operator in order to allow to take managerial decisions.

ANIMAL WELFARE OFFICERS MUST WORK INDEPENDENTLY

→ FVE believes that an ‘Animal welfare officer’ must be an **INDEPENDENT** person directly in charge of the welfare of transported animals

Article 7.2(b)

Instructions on watering, feeding and care of the animals must be provided **“in a language that attendants understand”**.

Article 10

The training of animal welfare officer must inherently be different from and must go beyond the training of drivers and attendants. FVE believes that this role requires an additional set of skills and profound knowledge and requires a specific certification of competence by the competent authority (see comment on Article 37).

*ANIMAL WELFARE OFFICERS
MUST HAVE SPECIFIC TRAINING*

→ FVE believes that an 'Animal welfare officer' must be trained specifically and requires a specific certification of competence

Article 13

The certification of livestock vessels shall include in addition a document detailing animal care procedures and how veterinary intervention will be assured in case of diseases or accidents. Article 13 should also apply to Ro-Ro vessels.

Article 17

FVE fully supports veterinary supervision and documentation of loading to ensure fitness for transport. The supervision of loading must be risk-based. In particular, animals loaded for cross-border transport of terrestrial livestock for slaughter, depopulation and animal confiscation measures, export to third countries and for long distance transports are most at risk. Therefore, the conditions of lawful supervision should be specified. e.g. a list of animal species to be supervised, a list of transport types (e.g. transboundary terrestrial livestock transport for slaughter), a timeframe of the supervision (e.g. 24h before loading) and derogation options to animal welfare officers' inspections, where feasible, should be defined. The templates for the journey log must therefore mandatorily provide a line for the veterinarian's signature proving the supervision of loading and it must be clarified if the supervision shall be performed by an official veterinarian. To ensure that it becomes possible to achieve, capacity building of the veterinary services including at border inspection posts and control posts must be strengthened.

*CONDITIONS OF VETERINARY SUPERVISION
OF LOADING MUST BE SPECIFIED*

→ FVE urges policy makers to specify the conditions and requirements under which veterinary supervision and documentation of loading should be performed

Article 21

FVE welcomes very much the designation of animal welfare officers on livestock vessels. In coherence with other regulation designating animal welfare officers, animal welfare officers should be ideally veterinarians and must be enabled to work independently on board. They must be under the supervision of and formally report back to the transport operator's dedicated central animal welfare officer, ideally a veterinarian (see above). Article 21 should apply as well to Ro-Ro-vessels.

*ANIMAL WELFARE OFFICERS
MUST WORK INDEPENDENTLY*

→ FVE believes that animal welfare officers should be ideally veterinarians and must be enabled to work independently

Article 25

FVE supports veterinary supervision and documentation of unloading. As with supervision during loading, it should be risk-based. If the destination is a place where the physical presence of veterinarians cannot be assured, this may be facilitated by video surveillance and animal welfare officers' inspections. Options of lawful supervision should be specified. The templates for the journey log must provide a line for the veterinarian's signature proving the supervision of unloading. To ensure that it becomes possible to achieve, capacity building of the veterinary services including at border inspection posts and control posts must be strengthened.

CONDITIONS OF VETERINARY SUPERVISION OF UNLOADING MUST BE SPECIFIED

→ FVE urges to specify the conditions and requirements under which veterinary supervision and documentation of loading should be performed

Article 28

28.1 The term 'transport to slaughter' must be defined to avoid misclassification and falsification of documentation. We suggest amending to 'Transport of terrestrial animals other than domestic birds and rabbits, to slaughterhouses shall only be carried out in short, direct journeys without disintermediates. '

'TRANSPORT TO SLAUGHTER' MUST BE DEFINED

28.2 Special attention should be given to duly justified derogating authorisations for long journeys to the nearest slaughterhouse adapted to the species, particularly to avoid purely economic motivation for longer transport.

Article 29

29.1 Vulnerable animals should be transported for a maximum of 4 hours.

29.2 Feeding of unweaned animals is unfeasible to implement. A one-hour break usually does not allow the drinker to warm up sufficiently to the required temperature and feed all animals within this timeframe.

29.3 Journey stressors such hunger, thirst, separation, mingling with unknown peers, changes of the environment and exposure to rough weather continue to impact animals on sea. Therefore, sea transport, and particularly roll-on-roll-off sea transport must be counted as journey time and vehicles must be equipped with an approved feeding system. If the time on sea will not be counted at all, there is a high risk that operators shift entirely to sea journeys unlimited in time, circumventing all road travel rules.

TRANSPORT TIME ON SEA MUST COUNT AS JOURNEY TIME

→ FVE urges to include sea transport and particularly roll-on-roll-off sea transport must be counted as journey time

Article 31.2

Temperature ranges must be species-specific, including for poultry, and follow EFSA recommendations for thermoneutral zones during the entire duration of the transport. This must apply equally to all means of transport, including sea journeys.

*TEMPERATURE RANGES
MUST BE SPECIES-SPECIFIC*

In addition, minimum and maximum temperature forecasts must be set as of which all animal transport shall be denied, e.g. -6 and +32 °C unless temperature-controlled vehicles are used.

→ FVE urges that species-specific temperature ranges should be set (along with EFSA recommendations) and that animal transport shall be denied under extreme weather conditions

Article 34

While the intention of accredited control posts is much welcomed, the certifying independent body should be defined.

Article 36

Animal transport rules set out in this regulation, including the provisions on maximum journey times shall apply to animals on transit through the EU, too.

*JOURNEY TIMES SHALL
APPLY AS WELL FOR TRANSIT*

→ FVE believes that maximum journey times shall apply to animals on transit through the EU

Article 37.2

The training of animal welfare officer must go beyond the training of drivers and attendants, therefore, courses for animal welfare officers must cover additionally and specifically the role of Animal Welfare Officers, their duties, responsibilities, and rights, as well as their formal reporting obligations.

Animal Welfare Officers must be specifically trained, assessed, and certified as competent in all areas of animal handling, husbandry, disease management and slaughter for the relevant species and circumstances being transported. They must be qualified in animal care procedures and know when and how further veterinary intervention will be necessary in case of diseases or accidents. The slaughter competency should also be reflective of the stunning and slaughter equipment adapted to the species transported and available on the vessels.

Annex I

CHAPTER I FITNESS FOR TRANSPORT

3(a) Slightly injured animals are fragile and must never be considered fit-for-transport for long journeys.

CHAPTER V JOURNEY TIMES, TEMPERATURES, REST PERIODS AND WATERING AND FEEDING INTERVALS

2.2.(d) End-of-lay hens, both commercial layers and breeders, are equally fragile. End-of-lay breeding hens must be included in the definition.

CHAPTER VII SPACE ALLOWANCE FOR TRANSPORTS BY ROAD, RAIL OR SEA

3. Space allowance in area per animal [cm²] for poultry can be misleading due to the volume differences of broiler chicken and turkeys, for example. 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.

Notes to the Editor

About FVE

The Federation of Veterinarians of Europe (FVE) represents around 300,000 veterinarians across 38 European countries. FVE aims to enhance animal health, animal welfare, and public health and to protect the environment by promoting the veterinary profession. For further information, consult the FVE website www.fve.org or contact the FVE Secretariat at info@fve.org