
Response to Commission Communication on transport

The European Commission has published a Communication on the welfare of animals during transport on 10 November 2011. We are disappointed that the Commission does not intend to propose any changes to the EU's legislation on animal transport (Council Regulation 1/2005 on the protection of animals during transport).

Has the Regulation led to an improvement in animal welfare?

The Commission Communication states that the Regulation has had beneficial impacts on welfare during transport. We fear that this overstates the case and could be misleading. The external study carried out for the Commission on the impact of the regulation on the protection of animals during transport¹, concluded that the Regulation "has led to a slight improvement in animal welfare".

Need for Regulation 1/2005 to be amended to bring long journeys to an end

At present the legislation allows animals to be transported over huge distances across Europe for slaughter or further fattening. However, it is widely recognised that these long journeys often entail severe welfare problems and can result in considerable suffering for the animals concerned.

Indeed Regulation 1/2005 points out in Recital 18 that "Long journeys are likely to have more detrimental effects on the welfare of animals than short ones" and in Recital 5 that "For reasons of animal welfare the transport of animals over long journeys, including animals for slaughter, should be limited as far as possible".

Moreover, the scientific opinion adopted in December 2010 by the European Food Safety Authority (EFSA)² stated, when referring to the need to prevent the spread of disease associated with transport, "**strategies should be developed to reduce the volume of transport** (e.g. replacing the transport of breeding animals by using semen or embryos), **and long distance transport of animals for finishing or slaughter** (e.g. by the transport of carcasses and food products) or **reducing journey time** (e.g. by slaughtering animals as close as possible to the site of production)."

We believe that many of the problems associated with transport could be addressed by placing a short maximum permitted journey time on the transport of animals for fattening or slaughter. We share the view of the Federation of Veterinarians of Europe which states that "Animals should be reared as close as possible to the premises on which they are born and slaughtered as close as possible to the point of production". We believe that in order to convert this principle into practical reality, a maximum overall limit should be placed on journeys to slaughter or for further fattening. Only short journeys as defined in the Regulation 1/2005 (Annex I, Chapter V, paragraph 1.2) should be allowed, i.e. a maximum of 8 hours.

Need for Regulation 1/2005 to be amended to bring it in line with current scientific knowledge

The Commission's Communication concludes that according to the recent EFSA scientific opinion parts of the Regulation are not fully in line with current scientific knowledge. Article 32 of Regulation 1/2005 states that the Commission's report "may be accompanied if necessary by appropriate legislative proposals". We believe that it is important for the Regulation to be amended so that it is properly based on up-to-date scientific research.

In particular, in addition to journey times, amendments are needed concerning the transport of horses and rabbits, space allowances, deck heights and temperature requirements. The existing provisions for the transport of cats and dogs must also be reviewed.

¹ STUDY ON THE IMPACT OF REGULATION (EC) No 1/2005 ON THE PROTECTION OF ANIMALS DURING TRANSPORT
<http://www.ibf.be/animalstransport/reports/12%2007%202011-Final%20Report.pdf>

² Scientific Opinion Concerning the Welfare of Animals during Transport, EFSA Journal 2011;9(1):1966 [125 pp.]
<http://www.efsa.europa.eu/en/efsajournal/doc/1966.pdf> page 86

Importance of improved enforcement

We welcome the Communication's recognition that effective enforcement of the Regulation remains a major challenge and that improved enforcement is a priority. Lack of enforcement results in many animals being transported long distances in poor quality conditions, including overcrowded vehicles with inadequate ventilation and insufficient headroom. Often animals are transported on long journeys without being given breaks for rest, food and water as required by the Regulation. In addition, ill and injured animals are regularly being transported to slaughterhouses in some Member States in contravention of the Regulation's prohibition of the transport of unfit animals.

We regret that among the measures proposed to improve enforcement, the Communication does not make any reference to the role of the Food and Veterinary Office: more inspections, based on risk assessment, are needed in Member States showing repeated failures in the implementation and enforcement of Regulation 1/2005.

We regret also that the Communication does not go into sufficient detail as to how the Commission proposes to tackle the long-standing failure by many Member States to properly enforce the Regulation. In 2010 Compassion in World Farming, Eurogroup for Animals and Animals' Angels produced the attached paper that seeks to identify the most common infringements of the Regulation and to set out the practical steps that need to be taken by Member States to secure improved compliance. That paper has been submitted to the Commission. We believe that it could form a useful basis for an EU action plan to achieve effective enforcement of the Regulation.

Satellite navigation systems

Regulation 1/2005 requires vehicles transporting animals on long journeys to be equipped with a satellite navigation system that records key data. Initially it was believed that this would lead to markedly improved enforcement of the Regulation. The Commission's Communication recognises that, unfortunately, these navigation systems have so far failed to reach their potential in delivering this anticipated beneficial impact on enforcement. We believe that in order for these systems to facilitate improved enforcement, they must be required to have the capacity to transmit data in real time to an EU database to which Member State competent authorities have access. This will enable the authorities to verify whether the journey is being carried out in compliance with the Regulation.

Transport of farmed fish

We are pleased that the Commission plans to commence a study on the welfare of fish during transport. We hope that this will result in the Commission presenting a proposal to adapt Regulation 1/2005 in relation to the transport of fish. A large number of farmed fish are regularly transported by road, in boats and even by helicopter. Moreover, EU aquaculture is likely to expand rapidly in the near future. In light of this it is important for the Regulation to provide proper safeguards for the welfare of farmed fish during transport.

Transport of dogs, cats and rabbits

Amendments are needed concerning dogs, cats and rabbits: maximum journey times for all three species must not exceed 8 hours, the intervals between feeding and watering must be significantly reduced, especially for young animals, and rest stops must be long enough to allow for consumption and digestion /absorption of food and water. Minimum space allowances must be set that allow dogs, cats and rabbits of all ages to stand, sit erect, lie down in a natural position and turn around normally whilst standing up.

Conclusion

Substantially improved enforcement of Regulation 1/2005 is essential. However, that alone cannot properly address the animal welfare problems that frequently arise during long journeys. These problems could be avoided by adopting the principle that animals should be reared as close as possible to the premises on which they are born and slaughtered as close as possible to the farm of rearing. In order to convert this principle into practical reality, a maximum overall limit should be placed on journeys to slaughter or for further fattening. Only short journeys as defined in Regulation 1/2005 (Annex I, Chapter V, paragraph 1.2) should be allowed i.e. a maximum journey time of 8 hours.

In addition the Regulation should be amended to:

- Bring it into line with current scientific knowledge, in particular concerning transport of horses, deck heights, space allowances and temperature requirements.
- Require vehicles' satellite navigation systems to be able to transmit data in real time to an EU database to which Member State competent authorities have access
- Provide proper safeguards for the welfare of farmed fish during transport.
- Address the specific welfare needs of other species, including farmed rabbits, dogs and cats