

Meeting of the sub-group on transport

Limiting journey times

Third meeting, 24 June 10:00-12:30
(Videoconference on Teams)

– MINUTES –

Attendance

Independent expert	Michael Marahrens
Civil society organisations	Animal Welfare Foundation Animals' Angels
Business and professional organisations	FEFASS UECBV Copa
Member States	Portugal The Netherlands Spain
European Commission	DG SANTE G5 DG SANTE F2
Guest(s)	Millieu/Ecorys Consortium

Discussion

1. Welcome and short introduction on the topic

The Commission briefly presented the topic of the meeting, limiting journey times as a possible policy option.

2. Limiting journey times: Do you think that limiting journey times is a solution?

Participants presented two of the reports they had shared prior to the meeting:

- Transport limitations according to current German legislation on the protection of animals during transport
- The Netherlands shared a report on fitness for transport and “fitness for the intended journey” regarding end of production. A protocol is proposed to assess if certain animals should only be transported for a limited time directly to the slaughterhouse, without using assembly centres. The Dutch competent authorities will now work on implementation of this advice.

These can be found in the Digital Tool of the Subgroup.

The following issues were raised:

- Temperatures:
 - Based on documents shared prior to the meeting, the recent German initiative of limiting journey times was explained: Germany limits transport duration to slaughterhouses but allows for an extension beyond the 8 hours if the vehicle is of type 2. If temperatures are expected to be higher than 30 degrees during the transport to slaughterhouses, the total transport time must not exceed 4.5 hours. This new rule does not cover transport of poultry.
 - A reason for that extension is that occasionally slaughterhouses are further away than 8 hours. Regular contact with competent authorities in these cases is important to avoid delays or being stuck in a traffic jam. Operators work towards transporting animals during the day only when a slaughterhouse is very close by.
 - In the Netherlands it is forbidden to transport animals if outside temperature is 35 or above, whether the transport happens within the country or towards another Member State. This applies to all species.
 - Switzerland assumes that the temperature inside transport containers for poultry is the outside temperature + up to 9 degrees.
- Some participants stressed that the length of the journey is key: the longer the journey is, the worse for the welfare of the animals because of physiological and ethological limitations of their coping capacities to environmental and management stressors. Others disagreed with this statement.
- Opinions were divided in limiting journey times and for which animals:
 - a) some participants support limiting journey times i.e. 8h for all animals, irrespectively of whether they are for slaughter or for other purposes, 4h for vulnerable ones
 - b) some support limiting further journey times on the basis of whether animals are for slaughter or not, as normally slaughterhouses are not far by;
 - c) some do not support limiting journey times, but for vulnerable animals;
 - d) some support a better definition of animals not fit for transport.
- All participants, included those who do not support limiting journey times, stressed the need to improve the quality and to shorten the allowed duration of transport, in particular that of vulnerable animals.
- Better definitions of vulnerable animals, fitness for transport, categories for this fitness (severe injuries, mild injuries...) need to be in place. Attention should be paid to end-of-career animals, with a lower value.
- The concept of “gentle transport” was proposed.
- Better enforcement of current and possibly future legislation should also be a priority.
- Most participants insisted on having mandatory rules rather than guidelines to ensure level playing field and a harmonised implementation.

The following challenges with the current Regulation were mentioned:

- Vague, unclear, undefined terms.
- Allowing for collection in several assembly centres and not counting the time on ro-ro vessels as journey time may affect negatively the welfare of the animals.
- The increasing number of long transports should be addressed; the Regulation calls for a limit of these in article 3 and whereas 5.
- The provisions for poultry transports are not specific enough and especially those for long journeys are not clear.
- Difficulties in ensuring coherence with other pieces of legislation, i.e. social regulations for drivers. Indication of how many drivers are needed for long distance transport would be welcomed.
- Difficulties in finding control posts for some species: ideally for these species there should be some flexibility allowing for other kind of establishments for resting purposes.
- “Final destination” must be clearly defined. Assembly or quarantine centres should not be considered “final destination”.
- Difficult to feed and water animals on board. The design and number of the drinkers is challenging.
- Not enough mandatory checks on long distance transports.
- Lack of an absolute transport time limit
- Difficult to apply sanctions to foreign operators and when transports take place outside EU

- Density becomes challenging on long distances (they don't consent to rest, move and reach drinkers)
- Contingencies become more challenging on long distances and in foreign countries (example: to take care of an injured animal)

On simplifying rules by means of, i.e. limiting the use of control posts and addressing some of the challenges abovementioned:

- Control posts should be certified and regularly audited by the European Commission both on the equipment and the way they are managed.
- Density of control posts should be higher.
- Long journeys should be carried out by vehicles type 3.
- Geographic differences and needs should be taken into account i.e. remote areas with no slaughterhouses around, the different needs for having control posts...
- Animals should be put in quarantine only in the country of departure so as to not lose track of them.
- Common standards for the construction of vehicles transporting animals in terms of feeding and watering devices.
- Harmonisation in sanctioning systems i.e. indication in regulation of which competent authority should be fining non-compliant operators, clear list of situations that would lead to a withdrawal of certificates/licenses.
- Some members supported limiting in number the use of control posts and of assembly centres
- Include in bilateral agreements with third countries provisions on standards for animal welfare
- Records of temperatures and humidity as well as SNS data easily accessible by Member States should be put in place and shared in common databases (TRACES, IMSOC).
- Records of tachographs can be accessory.
- Training of staff on reading the records of all these is fundamental.
- Training and further education for the members of the competent authorities for the technical and legislative supervision of transports at European level is of paramount importance.
- Reducing journey time limits
- Setting an absolute journey time
- Reduce the number of long transports
- Reduce density on long distances
- Harmonize animal rests and drivers breaks
- Increase minimum number of long transports which must be checked
- Stricter temperature provisions on long distances