



European  
Commission

## Meeting of the sub-group on transport Space allowances, sanctioning system, cats & dogs

Ninth meeting, 9 December 2022 10:00-12:30  
(Videoconference on Teams)

### – Minutes –

**Chair of the meeting:** Mr Stanislav Ralchev & Ms Sandra Sanmartin, Unit 'Animal welfare, antimicrobial resistance', Directorate Crisis Management in Food, Animals and Plants, Directorate-General for Health and Food Safety (DG SANTE)

#### 1. Welcome and short introduction on the future of the subgroup

The Commission explained the way forward for the subgroup: two meetings more will take place in 2023, most likely in person the first one being in Spring. Michael Marahens is not able to participate as a member of the platform. Another expert will be selected from the pool of candidates that applied for the establishment of the subgroup.

#### 2. Space allowances: short introduction and discussion on the EFSA recommendations

- Main impacts (e.g. transport flows, costs...)
- Transitional period

The Commission gave a short overview of the issue and the EFSA recommendations with regards to the space allowance. Members were invited to provide their input as to the impacts of the EFSA recommendations.

-Some members questioned the scientific basis used by EFSA considering it weak as to the K values. The studies do not always consider categories of animals; they take into account housing conditions, and it is not clear the relation between space allowance and increase of welfare.

-More space could be dangerous for animals. Less space could lead to more movements, increasing the price and carbon emissions.

-Some members agreed on the need to increase space allowance but not to the extent EFSA proposes.

-Space under high temperatures is also needed. Height is also relevant.

-EFSA is also lacking indications on vessels so the Australian example could be followed.



-Space allowances are currently insufficient. On animals getting injured due to too much space, is not necessarily true given that dividers are needed. To some members EFSA's recommendations do not lead to such big spaces that these would lead to these injuries.

-Important to keep a level playing field across the EU.

-Temperature intervals need to be looked at in order to reduce the loading density, along with climatic differences. In different Member States adjustments to space allowances depending on temperatures are imposed. Harmonisation in this regard needs to be addressed.

-In terms of the limits on the height of the vehicles themselves, exceptions for these could be explored when transporting animals.

-Some members consider EFSA's figures to be reasonable and these should not be excluded a priori for reasons of economic impacts.

-For sea transport it is important to consider ventilation, humidity and presence of ammonia. Bedding is also relevant in the context of all these elements that could affect the welfare.

-More research is needed on transport issues.

-EFSA recommendations do not always match the challenges experienced in real life.

### 3. Sanctioning system

- Main issues and differences between Member States
- Possible harmonisation of sanctions (e.g. definition of severity of non-compliances)

-Improving uniformity of controls and sanctioning across Member States is needed.

-Portugal indicated that lack of proper documentation, fitness for transport and journey times are the most common non-compliances. It is not easy to control space allowances. For sea transport, if the estimated weight is lower than the real weight, the organiser is penalised in the next journey. For short journeys, there is no information on the size of the vehicle, which makes it more difficult to estimate space allowances. Journey logs and journey times are not easy either and requested document is not always provided.

-Czech Republic indicated that the different weights, size and ages of animals make it difficult to estimate space allowances. Trucks in transit cannot be controlled unless police is there. Feedback in TRACES from the place of destination is not always available making it difficult to see if everything has gone well. Working with transporters from other Member States makes enforcement difficult.

-Netherlands has a list with administrative fines per non-compliance. Fines increase proportionally to the incidence. Catching injuries are one of the most regular non-compliances together with fitness for transport, especially prolapses, broken legs, inflammations and 90% gestation and moving calves within one week of birth. Journey plans are also fined on the basis of retrospective checks. Fitness for transport is particularly difficult to sanction, loading density as well. Heat stress is also difficult to sanction. Registration of an available loading area in combination with weight of animals could help with the enforcement, together with feedback from other Member States.



-Receipts of the weight of the animals could also be used for retrospective checks and be added to the journey log. Also indicating the number of animals per category. Having a basic framework for sanctioning with an indication of their severity would help harmonising these. Police and customs should also be able to issue sanctions (e.g. Italy allows for this possibility with the exception of assessing the actual welfare of the animals).

-The journey should be electronically so as to help assessing it. THETIS is a good example of how exchanging data could improve the harmonisation of controls.

-Another relevant issue is the lack of contingency stables. Competent authorities cannot always unload the animals for instance, when there is a need to make sure animals do not continue the journey under the conditions in which they're found, or to stop the operation until the fines are paid.

-Better communication between competent authorities is fundamental, including authorisations of transporters.

-Commission needs to enforce also the current regulation on Member States. Infringements reports are also very important.

-Important to define in the new regulation who is responsible for which violation and the corresponding sanction, at national level as well.

#### **4. Transport of cats & dogs: work of the voluntary initiative**

##### **- Presentation by Commission on the main outcomes**

The Commission presented specific measures for transport of cats and dogs considered to be incorporated in the revised Regulation. These include increasing minimum age for independent transport of puppies and kittens to 15 weeks, setting acceptable temperatures and humidity, space allowance and design of containers, additional vaccinations, setting journey times, resting and feeding / watering regimes. Members were asked to identify measures to be prioritised.

Members pointed out the importance of traceability (including setting up databases of dogs).

The need to approve means of transport for cats and dogs was also raised.

