

Temperatures

Options	PROS	CONS	IMPACTS	ALTERNATIVES
Seasonal ban	<p>It would even cause problems in the north although it would be easier to implement. There will still be some months during summer, where it will be a problem , and it will provide challenges for keeping up production during summer and will create logistic problem all through the value chain. Especially with the development in temperatures with the climate changes.</p> <p>Solves the problem in summer and winter.</p> <p>It will solve the problem with temperature, but it will create a lot of new problems with logistics through the value chain.</p> <p>The rules would be clearer with a seasonal ban leaving no room for interpretation.</p>	<p>Difficult to implement in the South and even in the North where temperatures are colder;</p> <p>Some members indicated that the recommendation from EFSA does not take into account that temperatures vary across seasons, from country to country and from year to year and will be impossible to implement in real world. It does not take into account that animals in geographical areas can be more used to high temperatures.</p> <p>The recommendation does not take into account the social and economic impact, where the consequences of a seasonal ban will be that the whole production flow will be destroyed and lead to a situation where even in the North it will only be possible to produce milk, eggs and meat during winter. Such a seasonal stop of production is not realistic from a practical point of view.</p> <p>Some other members stressed their disagreement as</p>	<p>Trade patterns during extreme temperatures are to be organised.</p> <p>It would imply no trade during summer.</p> <p>More control posts needed.</p> <p>If trade would be limited during cooler hours, then for transports longer than 12 hours control posts would be needed.</p> <p>Huge readjustment in terms of farm + slaughter in preparation for the ban.</p> <p>It will lead to a situation where the whole production flow will be destroyed and where, even in the North, it will only be possible to produce milk, eggs and meat during winter. Such a seasonal stop of production is not realistic from a practical point of view.</p>	<p>Stricter temperatures with no margin of tolerance.</p> <p>Several members indicated that the current threshold of 30 degrees without any margin of tolerance could be a compromise.</p> <p>Consider the temperature of place of departure regarding place of destination: e.g. ES-IT could be ok.</p> <p>Some disagreements were expressed with the above alternative because temperatures at farms and during transport have a different impact on the welfare of the animals. This way the problem of extreme temperatures would not be solved this way, it would remain in some countries, like ES and IT.</p> <p>Reduce stocking density significantly and with new legal provisions during transport in high temperatures to compensate for the extra stress.</p> <p>Having specific rules rather than leaving it for the inspector to decide on what to do.</p>

		<p>temperatures at a farm and inside a truck have a different impact on the animal welfare due to the different environments and relevant factors (example: higher humidity, higher stress, higher density, limited water access and no food in the truck, together with extreme temperatures, make the impact of the same temperatures heavier).</p> <p>Temperatures vary throughout a season, a country, from year to year...</p> <p>Although similar “bans” already exist due to health reasons, for example bans during a time frame when the presence of vectors transmitting a disease is high, it would be legally difficult to implement.</p> <p>Does not solve the problem: the focus should not be on the month but the temperatures in the vehicle, regardless of the season.</p>		<p>Airflow can help to some extent ¹ although the most relevant would be air conditioning.</p> <p>Promote a development towards better vehicles with climate control solutions in the future for transport of animals above XX hours.</p>
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¹ Study by NL on relation between outside & inside temperatures [already published](#). Follow up study addressing summer and winter times. Multiple sensors in the car and outside of the car and they analyse how does the truck cope inside with the temperature.

<p>Transport only during the night</p>	<p>To some, there is already experience with transporting at night.</p> <p>Helps avoiding high temperatures during summer.</p> <p>The rules would be clearer with a seasonal ban leaving no room for interpretation.</p>	<p>It does not solve the extreme temperatures during cold winter.</p> <p>For transports that take more than 12 hours, the unloading needs to be scheduled during the day and this increases the risk of stress of animals having to be unloaded.</p> <p>More control posts would be needed because of shorter journey times.</p> <p>It leads to more loadings/unloadings which is the most stressful part of the animals.</p> <p>Staff and CA would have to work in the night. The lairages are not big enough to host all these animals and slaughter them during the day. This is not possible in most MS.</p> <p>Not a solution for long journeys.</p> <p>Does not solve the problem: the focus should not be on the month but the temperatures in the vehicle, regardless of the season.</p>	<p>Less production of animals in certain times of the year.</p> <p>Slaughterhouse's network closer to place of production in line with green deal.</p>	<p>Stricter temperatures with no margin of tolerance.</p> <p>Vehicles better equipped. Especially for long distance.</p> <p>Better and clearer instructions on how to maintain temperatures inside the truck.</p> <p>Derogations for different realities in different MS.</p>
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Additional comments:

- Lack of research on important aspects such as air flow inside the truck for cattle or to which extent ventilation can mitigate the heat stress. Also how lowering density could help.
- The exposure to high temperatures is also important.
- In some MS (e.g. Spain) it is required by law that the temperature in certain buildings with air conditioner is 27°C maximum. Although transport is excluded the proposal of maintaining animals cooler than people it is difficult to support, taking into account that animals are living most of their lifetime over this temperature. Air-conditioning could solve the issue but it is not convenient for environmental reasons. Ventilation is also needed to deal with excrements as air conditioning does not ventilate the vehicle. Banning a journey when the temperatures along the way exceed 30 degrees could be a solution.
- For poultry, sensors are not useful and cannot be placed in the right places to reflect the temperature in the right way.
- Sensors are not reliable in the opinion of some competent authorities, the format in which the data is received is subject to alterations.
- CCTV cameras should be placed to check whether animals present signs of stress.
- Trade patterns would have to change to adapt to new rules.
- To establish the location and number of sensors.

Vulnerable Animals

Options	PROS	CONS	IMPACTS	ALTERNATIVES
<p>Unweaned calves: max 8 h</p>	<p>Easier to implement.</p> <p>Less loading and unloading.</p> <p>Understood by some as a compromise towards the ban already requested.</p>	<p>Huge impact in trade patterns and will lead to journey hopping.</p> <p>Lack of control posts with facilities for unweaned animals.</p>	<p>Ireland needs must be considered.</p> <p>It will lead to several journeys.</p> <p>If they cannot transport calves will end up being culled on farm. For some, this cannot be an excuse; it's a downside that comes with the business model.</p>	<p>Proper enforcement of EU legislation. For some, better enforcement is not an alternative: it has not worked in the past 15 years.</p> <p>A total change of the current system without MS1 raising calves from another MS2 just to be sent to MS3.</p> <p>Banning unweaned calves transported.</p> <p>Increase it to 6 weeks and not 5 and increase the weight.</p>
<p>Unweaned calves: Journey of 8 h + 3 h feeding + 8 h journey</p>	<p>No pros for NGOs. Does not change the current situation.</p>	<p>More loading and unloading that are particularly stressful.</p>		<p>Alternative is to ban the transport of unweaned animals.</p> <p>Transitional period for reorganising the sector needs to be considered and stricter rules should apply in the meantime.</p>

Additional comments:

For pregnant animals, a ban should be in place for the last third of the gestation period. Hard to implement at times with regards to the stage of the gestation and the transporter should not be made responsible.

Exceptions should be in place e.g. for transporting a pregnant animal to a near farm. 2/3 tight but 7 month that's ok for breeding animals.

Pregnant animals should not be neither transporter nor slaughtered.

Slaughter at the holding of provenance should be promoted. To increase the weight until 50 kg as EFSA recommends is not a big problem for Spain