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WORKING DOCUMENT

From:	Presidency
To:	Working Party on Animals and Veterinary Questions (Animal Welfare)
N° prev. doc.:	13246/25
N° Cion doc.:	16405/23 + ADD 1-6
Subject:	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 - Consultation on Presidency text on Chapter VII of Annex I (Space allowance) - MS comments

Delegations will find in Annex comments from Member States (AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI) on the Presidency text on Chapter VII of Annex I (Space allowance) (as in document 13246/25) .

AW transport - Chapter VII of Annex I

From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Guidelines to be followed

Please kindly provide your contributions in the table below.

Drafting suggestions: you may use '**track changes**' or formatting (for example **bold-underline** for additions and ~~strike-through~~ for deletions, **where necessary, in a different colour**).

Name of document: please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments ondocx**

Thank you for your cooperation!

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

General comments	<p>AT (MS Comments):</p> <p>Austria would like to thank the Presidency for the proposed text. It is generally welcomed that animals will have more space. The new approach of a risk-based increase in space requirements is very much welcomed in terms of animal welfare,</p> <p>for example in the case of long-distance transport under difficult conditions, such as temperatures above 30 °C or transport on ro-ro ferries, where it is not possible to unload the animals for a longer period of time.</p> <p>CY (MS Comments):</p> <p>We would like to thank the Presidency for delivering a clear text that effectively addresses most of the concerns related to space allowances. Nevertheless, in our view, certain elements concerning the proportionality of some proposed requirements should be reconsidered.</p> <p>DE (MS Comments):</p> <p>We are in favour of the risk-based adaptation of k-values depending on the duration of the animals on the road vehicles or containers and therefore generally support the Presidencies proposal. However, in our view, the evidence-based k-values recommended by the EFSA should apply when animals spend more than 9 hours on a means of transport and not just in the special case of sea transport (roro-ferries and livestock vessels). For all stays of more than 9</p>
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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

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	<p>hours on a means of transport (or over 12 hours in containers), it should be ensured that all the animals can lie down to rest in a comfortable position, access food and water, and regulate their body temperature. The table should therefore only include two values per species: a k-value for time spent on a vehicle up to 9 hours (using, where available, values derived from the existing Regulation 1/2005; these values should also allow animals not just to stand but also, if necessary, to lie down and stand up again) and a k-value for time spent on a vehicle above 9 hours or any time spent on a livestock vessel (taking into account the EFSA recommendation; using the values from the Commission’s proposal). The adjustment of the value to other risk factors (temperature, horned, unshorn animals) is particularly relevant on journeys where the animals spend up to 9 hours on a vehicle (or up to 12 hours in a container), as the k-values recommended by EFSA already take these risks into account.</p> <p>ES (MS Comments):</p> <p>We appreciate the efforts of the Presidency and the Commission to establish harmonised and science-based rules on space allowances. We support the use of an automatic allometric formula as a more objective and transparent method to calculate the required area.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>Our position is to maintain the current density levels set out in Regulation (EC) 1/2005, maybe allowing only small adjustments for certain categories of animals where scientific evidence indicates that welfare could be improved.</p> <p>Using an internal Excel tool, we have analysed the practical results of applying the proposed <i>k</i>-values.</p> <p>The calculations show that in several cases the formula would produce very large variations in area and density, and even worse conditions for some categories of animals compared to the current regulation.</p> <p>Therefore, while we agree with the principle of a formula-based approach, we believe that further study and refinement are needed to ensure the system provides consistent and realistic outcomes for all species and weight categories, without causing regressions in animal welfare protection</p> <p>FI (MS Comments): FI supports the risk based approach</p> <p>FR (MS Comments): D'une manière générale, la France considère qu'avec le règlement 1/2005 actuel, c'est l'absence de clarté des règles et leur application insuffisante qui doivent être</p>

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	<p>améliorées. Pour cela, la formule allométrique, une application simple et accessible à tous, et le suivi des indicateurs (de charge) permettront un contrôle clair et suffisant. La France est donc favorable au maintien des densités actuelles en application du règlement 1/2005.</p> <p>FR (MS Comments):</p> <p>In general, France considers that with the current Regulation 1/2005, it is the lack of clarity of the rules and their insufficient application that needs to be improved. For this, the allometric formula, a simple application accessible to all, and the monitoring of (load) indicators will allow a clear and sufficient control. France is therefore in favour of maintaining the current densities under Regulation 1/2005.</p> <p>GR (MS Comments):</p> <p>.</p> <p>HU (MS Comments):</p> <p>We agree with the overall direction of the proposal; however, some fine-tuning may be necessary. In particular, we consider it important that the Commission develop an application or similar tool to ensure that the requirements regarding space allowance are clear and applied in a uniform manner across the entire EU.</p>

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	<p>LV (MS Comments):</p> <p>Latvia believes that implementation of the new K values proposed by DK PRES would have a very significant impact on agriculture and the supply of high-quality animal origin food supply.</p> <p>Economical impact on persons involved in animal husbandry, transportation would lead to decrease of farming, transport and number of animals raised in high, well controlled animal welfare conditions.</p> <p>Market disturbances would lead to rise of import of live animals and animal origin products from third countries, where animals are not kept, nor transported in the same level of welfare as in EU.</p> <p>We support of maintaining such requirements, which would maintain high standards of welfare for animals during the transport and improve requirements of Regulation 1/2005 which caused biggest challenges in implementation for Member States till nowadays.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>NL (MS Comments): In general we would like to point out that this is a very important topic with a lot of impact on animal welfare. We really appreciate the objective and scientifically based measures proposed by the presidency, using the allometric equation as suggested by EFSA. That is just the objectiveness and scientific base this regulation needs, which will benefit enforcement, the operators and the level playing field. So we would like to thank the presidency for taking this route. We do however believe that for the animal welfare to be enhanced in comparison with the current situation, a slightly different approach could be used, which we will explain in the table below.</p> <p>PT (MS Comments): We appreciate the work of the Presidency in presenting a new proposal on space requirements per animal. However, we believe that although an increase in space per animal is envisaged, this must be balanced and must not compromise the sustainability of live animal transport.</p>

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	<p>In addition, other factors must be taken into account, namely environmental sustainability and the need to make animal transport as efficient as possible. A balance is therefore needed between animal welfare, sustainability, efficiency, and economic and environmental impacts.</p> <p>We believe it is important to define adequate space requirements for the different animal categories.</p> <p>Also its important to define different k values for the weight categories or in alternative establish a unique k value with corrective factors for the weight categories.</p> <p>In resume we don't agree with the k values propose for long journeys and journeys by sea.</p> <p>The calculations for air transport should be reviewed in accordance with IATA rules, which must be made publicly available.</p> <p>RO (MS Comments):</p> <p>As a general comment, by increasing the space allowance, the number of animals loaded onto a vehicle will significantly decrease, having economic and environmental impacts.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>NL (MS Comments): In general if there are no drafting suggestions and/or no comments, that means we agree with the presidency proposal as it is.</p> <p>PT (MS Comments): We believe that the space requirements for livestock vessels should be specific and tailored to the type of transport.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

<p>CHAPTER VII</p> <p>SPACE ALLOWANCE FOR TRANSPORTS BY ROAD, RAIL OR SEA <u>OR AIR</u></p>	<p>CY (Drafting suggestions):</p> <p>CHAPTER VII</p> <p>SPACE ALLOWANCE FOR TRANSPORTS BY ROAD, RAIL, SEA OR AIR</p> <p>CZ (MS Comments):</p> <p>The Czech Republic has entered a scrutiny reservation on this chapter, as it has not yet formed a national position on the new space requirements.</p> <p>However, we would like to underline that the Czech Republic is not in a position to support the space requirements as currently proposed.</p> <p>We remain uncertain about the appropriateness of the proposed k values. The EFSA studies themselves indicate that there is considerable scope for further research in this area. In addition, there are differing opinions as to whether increasing the available space will have an unambiguously positive effect on animal welfare, or whether it could instead lead to a higher incidence of injuries or challenges in maintaining adequate temperatures during the winter months.</p> <p>Moreover, space requirements depend not only on the weight and size of the animals, but also on their category, physical condition, meteorological conditions, and the expected duration of the journey. We believe that, in particular, the different animal categories should be explicitly taken into account</p>
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Presidency text	Drafting suggestions and MS Comments
	<p>in the proposal. Applying a single k value to all categories of animals does not appear appropriate, as for some categories (especially young animals) this results, in our view, in an excessive increase in the required floor area compared with current provisions.</p> <p>The introduction of new space requirements would represent a significant change to current practice, entailing considerable financial costs and possible environmental impacts due to the need for more journeys.. It is therefore essential that the proposed values are thoroughly discussed (and supported by robust evidence). Therefore, we see room for further discussion on the setting of new k values.</p> <p>We propose that consideration be given to dividing space requirements into two groups: short-term transport (up to 9 hours) with the same space requirements as in Regulation (EC) No 1/2005, and long-term transport (over 9 hours) with increased space requirements corresponding more closely to column 2 (9–21 hours) of the current proposal.</p> <p>GR (Drafting suggestions): CHAPTER VII</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>SPACE ALLOWANCE FOR TRANSPORTS BY ROAD, RAIL, SEA OR AIR</p> <p>HU (Drafting suggestions): SPACE ALLOWANCE FOR TRANSPORTS BY ROAD, RAIL OR SEA <u>OR AIR</u></p> <p>HU (MS Comments): We support the idea of having a dedicated chapter on air transport</p> <p>LU (MS Comments): LU: ok</p> <p>RO (MS Comments): In our opinion, the provisions concerning space allowance for transports by air should be harmonized with International Air Transport Association technical rules set out in Live Animals Regulations, as transport by air can be carried out only by transporters that are members of IATA.</p>

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Presidency text	Drafting suggestions and MS Comments
<p>1. <u>Allometric equation to calculate space allowance for animals of bovine, porcine, ovine and caprine species, weaned farmed lagomorphs and poultry other than day-old chicks</u></p>	<p>CZ (MS Comments): We do not consider the use of a single „k“ value for all animal categories appropriate, In our view, this approach leads to an excessive increase in the required floor area for some categories, particularly young animals such as piglets and calves.</p> <p>We suggest dividing space requirements into two groups: short-term transport (up to 9 hours), maintaining the current values under Regulation (EC) No 1/2005, and long-term transport (over 9 hours) with increased space requirements corresponding more closely to column 2 (9–21 hours) of the current proposal.</p> <p>DE (MS Comments): We are in favour of the allometric equation as it allows for evidence-based provisions that can be easily understood by business operators and enforced by competent authorities.</p> <p>EE</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>(MS Comments):</p> <p>Allometric equation has made the calculations and understanding easier to understand. However, the longer journeys with this allometric equation mean 2 travels instead of one (e.g. pigs and long journey – current: 25-34 pigs per journey; future: 25 pigs per journey means 2 rides (9 animals is quite a number). EE is concerned of how this correlates with the EU CO₂ emission plans.</p> <p>There must be a better way how to increase the animal welfare also with better conditions in the truck together with space allowances, that are less heavy burden to the producer, roads, and to the environment.</p> <p>ES</p> <p>(MS Comments):</p> <p>We welcome the scientific approach and the replacement of fixed ranges by an automatic calculation system based on the allometric formula.</p> <p>This represents an important step towards greater transparency, harmonisation and consistency in the determination of space allowances.</p> <p>However, after analysing the practical outcomes of the proposed <i>k</i>-values, We is not fully confident that the figures generated by the current parameters are appropriate for all species, weight categories and journey durations.</p> <p>In several cases, the results show very large variations and even reductions of</p>

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	<p>space compared to the current Regulation, which would not contribute to improving animal welfare.</p> <p>We therefore support maintaining the allometric approach but we believe that the specific <i>k</i>-values should be further reviewed and refined to ensure that the formula provides realistic and balanced results across all situations.</p> <p>FR (MS Comments): La France est favorable au traitement spécifique, sans formule allométrique, des équidés, des chiens et des chats, des lapereaux et des poussins.</p> <p>FR (MS Comments): France is in favour of the specific treatment, without allometric formula, for equidae, dogs and cats, rabbits and chicks.</p> <p>HR (MS Comments): HR supports to maintain the current values for space allowances as laid down in 1/2005 that would be calculated by using allometric equations for all animals concerned</p> <p>LU (MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>LU: in favour of an allometric equation</p> <p>PL (MS Comments): In general we like the proposed k values.</p> <p>PT (MS Comments): We believe that space requirements should be defined for a greater number of animal categories and weights. There should be k correction factors, depending on the weight of the animals.</p>
<p>1.1.1. Space allowance for transport <u>of bovine, porcine, ovine and caprine species, weaned farmed lagomorphs and poultry other than day-old chicks</u> by road, by rail, or by sea <u>or air</u>, including transport in containers, <u>shall be</u> is-calculated using the following allometric equation:</p>	<p>FR (MS Comments): La France est favorable au traitement spécifique, sans formule allométrique, des équidés, des chiens et des chats, des lapereaux et des poussins.</p> <p>FR (MS Comments): France is in favour of the specific treatment, without allometric formula, for equidae, dogs and cats, rabbits and chicks.</p> <p>HU (Drafting suggestions):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>1.1.1. Space allowance for transport <u>of bovine, porcine, ovine and caprine species, weaned farmed lagomorphs and poultry other than day-old chicks</u> by road, by rail, or by sea or air, including transport in containers, <u>shall be</u> is calculated using the following allometric equation:</p> <p>HU (MS Comments): see above</p> <p>LU (MS Comments): LU: ok</p>
$A = kW^{(2/3)},$	<p>AT (MS Comments):</p> <p>In principle, the allometric equation is welcomed as a means of striving to provide as much space as possible for the animals and adapted to the individual animal. In view of the ongoing digitalisation, the formula also appears to make sense. Nevertheless, Austria would like to point out that the live weight is currently an estimated weight, as the animals are rarely weighed.</p> <p>EE (MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>When using allometric equation, all the MS need to understand the decimal place, where the answer is rounded up to. This should be clearly stated.</p> <p>EE suggests that calculator for all the animal species would be provided for people, who need to calculate space allowance.</p> <p>LU (MS Comments): LU: ok</p> <p>PT (MS Comments): Correction factors for k must be included based on the weight of the animals.</p>
<p>whereby: A=area per animal [<u>m² for animals of bovine, porcine, ovine and caprine species</u> or cm² for <u>weaned farmed lagomorphs and poultry other than day-old chicks</u> for transport of birds and rabbits in containers], W=live weight [kg], k= k-value <u>which is</u> (specific to species/category, as <u>and is</u> laid down in tables below).</p>	<p>LU (MS Comments): LU: ok</p>

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Presidency text	Drafting suggestions and MS Comments
<p><u>1.1.2. The time mentioned in the tables below includes the time the animal spends on a road or rail vehicle, including any time the road or rail vehicle is on board of a roll-on roll-off vessel.</u></p>	<p>FR (Drafting suggestions): 1.1.2. The time mentioned in the tables below includes the time the animal spends on a road or rail vehicle, including any time the road or rail vehicle is on board of a roll-on roll-off vessel, <u>without unloading the animals.</u></p> <p>FR (MS Comments): C'est bien le temps passé dans le même véhicule (par route, rail ou mer) sans déchargement.</p> <p>FR (Drafting suggestions): 1.1.2. The time mentioned in the tables below includes the time the animal spends on a road or rail vehicle, including any time the road or rail vehicle is on board of a roll-on roll-off vessel, <u>without unloading the animals.</u></p> <p>FR (MS Comments): This is the time spent in the same vehicle (by road, rail or sea) without unloading.</p> <p>LU (MS Comments): LU: ok</p> <p>NL</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>(Drafting suggestions):</p> <p>1.1.2. The time mentioned in the tables below includes the time the animal spends on a road or rail vehicle or in a crate or container, including any time the road or rail vehicle is on board of a roll-on roll-off vessel.</p> <p>NL</p> <p>(MS Comments):</p> <p>Since the time the animal actually spends in the space it is transported in has the most effect on the welfare of the animals in combination with the space allowance, we greatly appreciate that the time mentioned in the tables is the time the animal actually spends on the means of transport, whether it is moving or not.</p> <p>This is also true for animals transported in crates or containers: the time the animal actually spends in the crate or container should count, since that is the place where the space allowance has an effect. Meaning the time should count from the first animal that is loaded into the container of crate until the last animal has been removed from the container or crate.</p> <p>PT</p> <p>(MS Comments):</p> <p>We agree that animals shall maintain the established density while road and rail vehicles are on board the ro-ro ferry.</p>

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	<p>It should be made clear in this chapter, or in the chapter on journey times, that the time during which the road or rail vehicle is on board the ro-ro vessel counts only for the purpose of calculating the space required per animal and not for calculating journey times.</p> <p>SE (Drafting suggestions):</p> <p>1.1.2. The time mentioned in the tables below includes the time the animal spends, in a container or on a road or rail vehicle, including any time the road or rail vehicle is on board of a roll-on roll-off vessel.</p> <p>SE (MS Comments):</p> <p>It needs to be clear that the time indications that are given also apply to the time the animals spend in containers.</p>
	<p>FR (Drafting suggestions):</p> <p><u>1.1.3. In case of transport of animals with horns, space allowance shall be increased on the basis of the species adapted tables and to accommodate the physical size of all animals and prevent injuries.</u></p> <p>FR (MS Comments):</p>

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	<p>A la place des points 1.2.3 et 1.4.4, ce point général englobe les bovins, les ovins et les caprins</p> <p>FR (Drafting suggestions):</p> <p><u>1.1.3. In case of transport of animals with horns, space allowance shall be increased on the basis of the species adapted tables and to accommodate the physical size of all animals and prevent injuries.</u></p> <p>FR (MS Comments):</p> <p>In place of points 1.2.3 and 1.4.4, this general point covers bovine, ovine and caprine animals.</p>
<p>1.2. Bovine species</p>	<p>FI (MS Comments):</p> <p>The k values presented for cattle are acceptable to Finland. However, there is a risk of complications. We have previously talked about travel times, and it had been specified in the travel times that the time on board a ro-ro vessel would not be included in the travel time. In this case, however, the time spent on board a ro-ro vessel would be included. This may cause unclarity having two similar times with different requirements.</p> <p>HR (MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>See general comment in 1.</p> <p>PL (MS Comments):</p> <p>If there is only one k value for unweaned animals it should be repeated in each column or the rows should be merged, because in the current redaction it looks like there is no value for unweaned animals.</p>
<p>1.2.1.—Space allowance <u>in m²</u> area per animal [m²] during <u>for</u> transport <u>of</u> <u>bovine species</u> by road, by rail, or by sea, shall <u>be calculated using the following k-values</u>:</p>	<p>AT (MS Comments):</p> <p>In principle, the adjustment of the K-value to the increased space requirements depending on the duration of transport, type of transport and animal category (e.g. weaned/unweaned) is very welcome.</p> <p>FR (Drafting suggestions):</p> <p>1.2.1. <u>In compliance with other regulations relating to maximum authorized weights on road transport, space allowance in m² per animal for transport of bovine species shall be calculated using the following k-values:</u></p> <p>FR</p>

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	<p>(MS Comments):</p> <p>Les transports par route nécessitent de respecter d'autres réglementations, notamment celle sur le poids maximal autorisé (jusqu'à 44 tonnes). Cette disposition pourrait figurer parmi les exigences générales, mais elle est importante surtout pour les animaux lourds.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>1.2.1. <u>In compliance with other regulations relating to maximum authorised weights on road transport, space allowance in m² per animal for transport of bovine species shall be calculated using the following k-values:</u></p> <p>FR</p> <p>(MS Comments):</p> <p>Road transport requires compliance with other regulations, in particular the one on the maximum authorised weight (up to 44 tonnes). This provision could be part of the general requirements, but it is important especially for heavy animals.</p> <p>LU</p> <p>(MS Comments):</p> <p>LU: ok</p> <p>NL</p> <p>(MS Comments):</p>

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	<p>We would suggest to use just two columns: one for transports up to 9 hours and one for transports of 9 hours and more. The K-value for the transports up to 9 hours should be 0,027 (so that the animals are able to stand an lie down) and the K-value for the transport of 9 hours and more should be 0,034.</p> <p>The time on the RoRo-vessel should counts as well as is proposed by the presidency and the K-value for livestock vessels should stay 0,034 as proposed by the presidency.</p> <p>If the above is not possible, then we are in favour of keeping the presidency proposal exactly as it is!!</p> <p>PT (MS Comments):</p> <p>We do not agree that the higher K should apply to livestock vessels. We believe that the K should be adjusted to the weight of the animals.</p> <p>We do not agree with comparing livestock vessels to ro-ro ships. The conditions for animal care, ventilation, temperature, humidity, density adjustment, transfer to hospital, among others, are completely different between these two types of transport.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>ES (MS Comments):</p> <p>We appreciate the effort to establish specific <i>k</i>-values for bovines according to journey duration.</p> <p>However, the analysis carried out using the proposed coefficients shows that the densities for long journeys decrease drastically compared with both the current Regulation and the short- and medium-duration categories.</p> <p>While additional space can contribute to improving animal welfare, the magnitude of the reduction appears excessive.</p> <p>We therefore believe that the <i>k</i>-values for bovines should be reconsidered to ensure a more proportionate increase of space, avoiding a level of reduction that could make the transport logistically unfeasible without providing a clear welfare benefit</p>
<p><i>see table 1.2.1. for bovine animals in document 13246/25</i></p>	<p>AT (MS Comments):</p> <p>For short journeys of Bovines, the proposed values do not differ from those in the Regulation (EC) No 1/2005.</p> <p>This proposal is supported, as short journeys usually involve little risk to the animals.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>Austria would like to express its reservation regarding the other 2 k-values, but in our opinion, the space requirement must be increased depending on the risk, especially for very long journeys where animals cannot be unloaded.</p> <p>BG (MS Comments): The proposed k-values lead to a very big reduction in space allowances for the animal species. Drastically expanding the permitted areas for animal transport will negatively impact the entire agricultural sector. For time < 9 hours on a road or rail vehicle, including on a roll-on-roll-off vessel, the density/ space allowance in m2 per animal should be as defined in the current Regulation 1/2005. The calculation of space allowances should be as much as simple and uniform.</p> <p>DE (Drafting suggestions): Change k-value for < 9 hours to 0,027 for weaned and unweaned animals. Delete table column concerning the categorisation '> 9 – 21 hours'. Change heading of table column '> 21 hours' to '> 9 hours'.</p> <p>DE (MS Comments): According to Presidencies explanation at the last Council working party meeting, the k-values for < 9 hours in the compromise text only take into</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>account the space requirements of animals when standing. This would not fulfil the need for individual animals to lie down, which primarily occurs in young (weaned and unweaned) animals within 9 hours. We therefore propose a k-value of 0.027 for < 9 hours, which is in line with EFSA concerning lying behaviour of young animals and also corresponds to the upper limit of Regulation 1/2005. For the other drafting suggestions please refer to our general comments at the beginning of the document (only two categories: < 9 hours and > 9 hours). We also consider it more user-friendly to only distinguish between two k-values.</p> <p>FR (MS Comments): la France souhaite maintenir les densités actuelles (route/mer) de 0,0205 (route) à 0,027 (mer par navire transroulier) pour l'espèce bovine, correspondant respectivement à un total maximal de 29 (route) à 22 (mer) bovins de 350 Kg en moyenne, pour une surface de 30 m² (un seul pont de 30 m²)</p> <p>FR (MS Comments): France wishes to maintain the current densities (road/sea) from 0.0205 (road) to 0.027 (sea per ro-ro vessel) for the bovine species, corresponding respectively to a maximum total of 29 (road) or 22 (sea) cattle of 350 Kg on average, for an area of 30 m² (a single deck of 30 m²)</p> <p>IE</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>(MS Comments): See comment in 1.2.2. below.</p> <p>LU (MS Comments): LU: supports the use of the k-values in document 13246/25</p> <p>LV (MS Comments): Latvia supports values and space for an animal indicated in the Regulation 1/2005.</p> <p>PT (MS Comments): It must be made clear in the table that the k value given for journeys of more than 21 hours applies only to ro-ro transport.</p> <p>SE (MS Comments): SE suggest that the k-value proposed by the Commission (0.034) should also apply for transports 9-21 h. For transports shorter than 9 hours a k-value of 0.028 for weaned cattle and 0.027 for non-weaned calves should apply as a minimum requirement.</p> <p>SI (MS Comments): k-value for <u>≤ 9 hours</u> should be 0,0270 instead of 0,0205</p>

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Presidency text	Drafting suggestions and MS Comments
<p><u>1.2.2. If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0340.</u></p>	<p>AT (MS Comments): An increase in space of 10% is welcome in the event of outside temperatures above 30 degrees Celsius. The outside temperature should be taken into account for the entire route.</p> <p>BE (MS Comments): The temperature forecast along the entire route should be taken into consideration when planning the journey, not just at a few specific places.</p> <p>CY (Drafting suggestions): 1.2.2. (a) For long journeys, if the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0340.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p><u>(b) Paragraph (a) shall not apply when the means of transport is equipped with a temperature control system which allows the temperature ranges in the animal compartment referred to in paragraph 0 of article 31 to be complied with during the whole journey.</u></p> <p>CY (MS Comments):</p> <p>In our view the increase in space allowance when the temperature exceeds 30°C should apply only to long journeys. This is because the risk of heat stress is significantly higher during long journeys, where animals are exposed to elevated temperatures for extended periods. In contrast, during short journeys, the limited duration of exposure to potentially challenging conditions reduces the overall impact on the animals. Applying the same increase in space allowance to short journeys would therefore not be proportionate to the actual level of risk. This is particularly evident in cases of very short transports, such as those taking place in Cyprus, where the vast majority of transports do not exceed 3 hours of journey time.</p> <p>Furthermore, for consistency with the new wording of Article 31, we believe that the weather forecast should not be taken into account when the means of transport is equipped with a temperature control system.</p> <p>CZ</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>(MS Comments):</p> <p>We agree with a 10% increase due to high temperatures, but for the sake of clarity, we disagree with the doubled accumulation of other factors.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p><u>1.2.2. If the external temperature is predicted to be above 30°C at the place of departure and or the place of destination, and or where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and or exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10[20] percent, except where the above table sets a k-value of 0,0340</u></p> <p>DE</p> <p>(MS Comments):</p> <p>In our view ‘or’ instead of ‘and’ should be chosen, as the provision should apply once one of the mentioned locations is affected. If our suggestion for a higher k-value of 0,027 is taken to account, we consider at least 10 % more space at high temperatures to be appropriate. Otherwise, we suggest at least 20% more space between animals to allow for better ventilation necessary for thermoregulation</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>and to prevent accumulation of noxious gases. Even if the proposed wording ‘at least 10%’ allows the application of 20%, we have concerns about harmonised enforcement. To create a level playing field, we suggest that 20% rather than 10% should be the minimum.</p> <p>ES (Drafting suggestions): border crossings crossing the territories of different Member States</p> <p>ES (MS Comments): We agree with the principle of adjusting space allowances in relation to higher temperatures, as this helps to prevent heat stress during transport. However, We considers that the 10% increase for high temperatures and the 10% increase for horned animals should not be applied cumulatively, but rather only once, since both adjustments address the same need, to provide animals with slightly more room to avoid injuries and ensure comfort under specific conditions. Applying both at the same time would result in an excessive unjustified increase in space. Additionally, regarding the wording, we do not believe that there should be border crossings between Member States, since there is a single market.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>FI (MS Comments): When the weather forecast is intended to be considered? Planning of journeys occurs often typically during previous week, at latest.</p> <p>FR (Drafting suggestions): <u>1.2.2. — If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k value of 0,0340.</u></p> <p>FR (MS Comments): Les voyages de longue durée peuvent faire intervenir un passage en centres de rassemblement ou en postes de contrôle : dans le premier cas, les lots et donc les densités peuvent être modifiées ; dans le second cas, les lots restent fixes et donc la densité ne peut pas être modifiée en cours de route.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>Pour éviter la complexité dans la gestion des températures prévues le long du voyage, en fonction de la route et des heures de passage, la France souhaite décorrélérer la température et les densités : ainsi, sous la responsabilité des opérateurs et avec une obligation de résultats, seules les fourchettes de températures enregistrées à l'intérieur des compartiments feraient foi. Les autorités compétentes pourraient contrôler le respect de ces températures, lors des contrôles sur route ou à postériori (notamment lors du renouvellement d'autorisation de transporteur).</p> <p>FR (Drafting suggestions):</p> <p><u>1.2.2. — If the external temperature is deemed to be above 30oC at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not considered with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k value of 0,0340.</u></p> <p>FR (MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>Long journeys may involve a visit to assembly centres or control posts: in the first case, the lots and therefore the densities may be modified; in the second case, the lots remain fixed and therefore the density cannot be changed along the way.</p> <p>To avoid complexity in managing the temperatures expected along the journey, depending on the route and the hours of passage, France wishes to decorrelate the temperature and densities: therefore, under the responsibility of the operators and with an obligation to produce results, only the temperature ranges recorded inside the compartments are valid. The competent authorities could check compliance with these temperatures during on-road or post-road checks (in particular when renewing a carrier's authorisation).</p> <p>GR (Drafting suggestions):</p> <p>1.2.2. (a) For long journeys, <u>if</u> the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0340.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p><u>(b) Paragraph (a) shall not apply when the means of transport is equipped with a temperature control system which allows the temperature ranges in the animal compartment referred to in paragraph 0 of article 31 to be complied with during the whole journey.</u></p> <p>GR (MS Comments):</p> <p>In our view the increase in space allowance when the temperature exceeds 30°C should apply only to long journeys. This is because the risk of heat stress is significantly higher during long journeys, where animals are exposed to elevated temperatures for extended periods. In contrast, during short journeys, the limited duration of exposure to potentially challenging conditions reduces the overall impact on the animals. Applying the same increase in space allowance to short journeys would therefore not be proportionate to the actual level of risk.</p> <p>Furthermore, for consistency with the new wording of Article 31, we believe that the weather forecast should not be taken into account when the means of transport is equipped with a temperature control system.</p> <p>HU (Drafting suggestions):</p> <p><u>1.2.2. If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at</u></p>

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Presidency text	Drafting suggestions and MS Comments
	<p><u>assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, border control post and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0340.</u></p> <p>HU (MS Comments): <u>In our opinion the wording should be in line with Chapter VI art. 31</u></p> <p>IE (MS Comments): Ireland very much welcomes the proposal for three different bands of k-values, depending on how many hours the animals travel. However, the upper limit of the middle band, 21 hours, would be problematic within the island of Ireland, creating a disadvantage for farmers in the western and northern parts that are furthest from the ferry ports (which are in the east and south-east). Ireland requests that the 21 hours in Table 1.2.1 be extended to 28 hours, or 26 hours as a compromise.</p> <p>LU (MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>LU: in our opinion, when evaluating the planning of a journey, the temperature prediction has to be considered along the <u>whole</u> route, not only on single relevant points (origine and departure). For example, a transport of pigs from LU to IT takes around 17 hours. If the journey starts in the morning (20°C at departure) it ends the following night (maybe 25°C at destination). Considering the current wording, this transport would have to be authorized. However, the temperatures along the route might easily exceed 30°C. LU does at the moment not authorize such transports where the temperatures exceed 30°C at any given point of the journey (either the transporter has to drive during the night, or such transports are banned until temps drop below 30°C).</p> <p>At the same time, LU agrees that increasing space allowance during periods with high temperatures will definitely have a positive impact on the wellbeing of the animals on the vehicle.</p> <p>LV (MS Comments): <u>If the external temperature is predicted to be above 30°C at the place of departure or in time of journey, or in the place of destination the transport of animals can't be allowed.</u></p> <p>NL (Drafting suggestions):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>1.2.2. If the external temperature is predicted to be above 30°C at the place of departure and or the place of destination, and where relevant <u>or during the journey, especially</u> at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0340.</p> <p>NL (MS Comments):</p> <p>We understand the rationale behind this proposal, but the temperature has a huge effect on the animal welfare. That is why the temperature of the entire journey should be taken into account. We currently practice this in the Netherlands. Operators have to hand in the weather forecast for the planned journey at different time intervals, with a special focus on the hottest periods of the day. Before certification, the weather forecast and planned journey are checked in office. When the temperature along the route rises above 30 degrees somewhere, the operator gets the chance to replan the transport so that the higher temperatures are avoided (for example by leaving earlier). This works really well and we have been doing this for several years. It would be great if a</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>weather forecast app like meteoblue could be integrated into TRACES to help with this check.</p> <p>PL (Drafting suggestions):</p> <p>1:2.2. — If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0340.</p> <p>PL (MS Comments):</p> <p>We mentioned in oral comments that instead of listing the list of places, reference could be made to Article 24. We also suggested that the provision should regards internal temperature within the animal compartment, as defined in the current proposal for Chapter VI, rather than the forecasted outside temperature, to assess when an additional 10% density reduction is necessary due to heat.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>However, after consideration we believe that either of these options would be immensely difficult to implement and to control in practical terms. Let's imagine that the means of transport is stopped for a control and it turns out that the outside temperature is above 30 degrees but the loading density of animals is not decreased because the forecast did not foresee such a high temperature. Is it justifiable that the animals are travelling at "normal density" and that the transporter is not subject to any action, purely based on the weather forecast, which can be highly variable? Is it reasonable and justified that the weather forecast, checked ex-post, will be the basis for taking action (or not) against a transporter?</p> <p>After careful consideration we believe that this provision shall be deleted all together. After all, the most important, from the animal perspective, is the internal temperature, and that is taken care of in chapter VI. Hence, this provision is superfluous, as it tries to regulate the same matter – i.e. the animal's decreased welfare caused by high temperature, but by referencing weather forecasts which were deemed unstable and unwanted by the majority of delegations. If we take the assumption that animals may be transported in a given range of internal temperatures, than this should be the only condition concerning temperatures. Possible lowering of density may be one the actions that may be taken when planning the journey to ensure compliance with the</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>temperature ranges, but it should not be formalized in the provisions concerning minimum space allowances.</p> <p>The temperature (and especially the weather forecast), unlike to issues of horned/unhorned or shorn/unshorn sheep are subject to variance, unlike the last two, which are simply qualities of animals transported that won't change during the transport (the horns won't grow more and unless you shear the sheep en route ☺ they are still unshorn or if shorn, they journey shall not be so long that they grow so much hair to become unshorn ☺). For this reason the temperature shall not be approached the same way as the other qualities of animals which result in increasing the space allowance, whereas in the proposal, it is even more formalized despite being more variable.</p> <p>PT (MS Comments):</p> <p>We propose that a sentence identical to the one currently in Regulation 1/2005 be included in this point.</p> <p>Any definition of the percentage of space to be increased depends on what is defined for space per animal.</p> <p>We emphasise that the increase in space must be balanced so as not to compromise the viability of transport.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>”These figures may vary, depending not only on the animals' weight and size but also on their physical condition, the meteorological conditions and the likely journey time.”</p> <p>SE (Drafting suggestions):</p> <p>1.2.2. If the external temperature is predicted to be above 30°C at the place of departure and <u>or at</u> the place of destination, and <u>or at</u> where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and <u>or at</u> exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10<u>20</u> percent, except where the above table sets a k-value of 0,0340.</p> <p>SE (MS Comments):</p> <p>The word <u>and</u> should be replaced with <u>or at</u> in three places in the paragraph. It should be enough that the temperature is above 30 degrees at one of these places for the requirement for more space should be applicable.</p>

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Presidency text	Drafting suggestions and MS Comments
	SE also suggest that COM's proposal for 20% more space when the temperature exceeds 30 degrees should apply instead of 10 %.
<p><u>1.2.3. In case of transport of bovine animals with horns, space allowance shall be increased on the basis of the above table to accommodate the physical size of all animals and prevent injuries.</u></p>	<p>AT (MS Comments): OK</p> <p>DE (MS Comments): We support this provision in the proposed way. As horns can vary greatly in size and shape, it is difficult to specify a minimum percentage for the surface area.</p> <p>FR (Drafting suggestions): <u>1.2.3. In case of transport of bovine animals with horns, space allowance shall be increased on the basis of the above table to accommodate the physical size of all animals and prevent injuries.</u></p> <p>FR (MS Comments): Cf point 1.1.3</p> <p>FR (Drafting suggestions):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>1.2.3. In case of transport of bovine animals with horns, space allowance shall be increased on the basis of the above table to accommodate the physical size of all animals and prevent injuries.</p> <p>FR (MS Comments): See point 1.1.3</p> <p>LT (MS Comments): Rewording is needed either of this point or the table (i.e. may be by adding the categories of the animals). Currently there is no relevance between physical size of the animal and presence/absence of horns. k-values are provided for weaned and unweaned animals only.</p> <p>LU (MS Comments): LU: welcomes the idea of increasing space allowance for animals with horns. Obviously the size of the horns has to be taken into consideration (Holstein vs. Longhorn)</p> <p>RO (MS Comments): Clarifying details should be provided. Additional space allowed to be provided for bovine animals with horns as compared to bovine animals without horns</p>

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Presidency text	Drafting suggestions and MS Comments
	should be given as a percentage.
<u>1.3. Porcine species</u>	<p>AT (MS Comments): For K values and temperatures, see comments under Bovines.</p> <p>CZ (MS Comments): In the case of pigs, some of the proposed space requirements show enormous increases (up to 150%). Such proposed requirements need to be reconsidered</p> <p>HR (MS Comments): See general comment in 1.</p> <p>HU (MS Comments): The proposed value of $k=0.027$ for maritime transport falls short of the current capacity provided for in Regulation (EC) No 1/2005, which represents a step backwards in terms of animal welfare.</p> <p>PT (MS Comments): Same comments as for the bovines.</p>

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Presidency text	Drafting suggestions and MS Comments
<p><u>1.3.1. Space allowance in m² per animal for the transport of porcine species shall be calculated using the following k-values:</u></p>	<p>LU (MS Comments): LU supports the use of the k-values in document 13246/25</p> <p>NL (MS Comments): We would suggest to use just two columns: one for transports up to 9 hours and one for transports of 9 hours and more. The K-value for the transports up to 9 hours should be 0,023 (so that the animals are able to stand an lie down) and the K-value for the transport of 9 hours and more should be 0,027. The time on the RoRo-vessel should counts as well as is proposed by the presidency and the K-value for livestock vessels should stay 0,027 as proposed by the presidency.</p> <p>If the above is not possible, then we are in favour of keeping the presidency proposal exactly as it is!!</p>
<p><i>see table 1.3.1. for porcine animals in document 13246/25</i></p>	<p>BG (MS Comments):</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>The proposed k-values lead to a very big reduction in space allowances for the animal species. Drastically expanding the permitted areas for animal transport will negatively impact the entire agricultural sector. For time < 9 hours on a road or rail vehicle, including on a roll-on-roll-off vessel, the density/ space allowance in m2 per animal should be as defined in the current Regulation 1/2005.</p> <p>The calculation of space allowances should be as much as simple and uniform.</p> <p>CY (Drafting suggestions): Time on a Livestock vessel</p> <p>CY (MS Comments): In the title of the column regarding space allowance for livestock vessels, we believe that the wording “Time on a” should be deleted since the time on the livestock vessel is not a criterion for the calculation of space allowance.</p> <p>DE (Drafting suggestions): Delete table column concerning the categorisation ‘> 9 – 21 hours’. Change heading of table column ‘> 21 hours’ to ‘> 9 hours’.</p> <p>DE (MS Comments):</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>Please refer to our general comments at the beginning of the document. We can accept the Presidencies proposed lowest k-value of 0,0197 for < 9 hours as according to EFSA it allows pigs to lie down. For longer stays above 9 hours on vehicles, more space is needed so that the pigs can move around more whilst others are still lying to access feed and water and to be able to thermoregulate sufficiently. Here, EFSA recommends a k-value of at least 0,027.</p> <p>ES (MS Comments):</p> <p>We welcome the use of the allometric formula for pigs, as it offers a more harmonised and objective approach compared to the current fixed ranges. However, our analysis of the proposed k-values shows that the results are not balanced across weight categories.</p> <p>The formula strongly benefits piglets and very light animals, producing a drastic reduction in density, sometimes over 50% compared to the current Regulation.</p> <p>In contrast, as the weight increases, the effect reverses: heavy animals (up to around 270 kg) would actually experience higher densities than today, despite being among the most vulnerable categories due to their size, age and lower tolerance to heat and movement.</p> <p>We therefore believes that the k-values for pigs should be revised and differentiated more clearly by weight category, ensuring that the formula</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>provides proportionate and realistic space allowances for all animals, without penalising the heaviest individuals.</p> <p>FR (MS Comments): Pour la détermination des facteurs k par espèce, la France souhaite maintenir les densités actuelles (route/mer) de 0,020 (route) à 0,027 (mer) pour l'espèce porcine, correspondant respectivement à un total maximal de 65 (route) ou 48 (mer) porcins de 110 kg en moyenne, pour une surface de 30 m².</p> <p>FR (MS Comments): For the determination of “k” factors per species, France wishes to maintain the current densities (road/sea) from 0.020 (road) or 0.027 (sea) for the porcine species, corresponding respectively to a maximum total of 65 (road) or 48 (sea) pigs of 110 kg on average, for an area of 30 m².</p> <p>GR (Drafting suggestions): Time on a <u>L</u>ivestock vessel</p> <p>GR (MS Comments):</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>In the title of the column regarding space allowance for livestock vessels, we believe that the wording “Time on a” should be deleted since the time on the livestock vessel is not a criterion for the calculation of space allowance.</p> <p>IE (MS Comments): Same comment as for 1.2.2. above.</p> <p>LV (MS Comments): Latvia supports values and space for an animal indicated in the Regulation 1/2005.</p> <p>SE (MS Comments): For porcine species SE propose a k-value of at least 0.021 for short journeys of maximum 9 hours. For journeys more than nine hours, EFSA's recommended and COM's proposed k-value of 0.027 should apply.</p> <p>SI (MS Comments): k-value for < 9 hours should be 0,0230 instead of 0,0197</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
<p><u>1.3.2. If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0270.</u></p>	<p>DE (Drafting suggestions):</p> <p><u>1.3.2. If the external temperature is predicted to be above 30°C at the place of departure and or the place of destination, and or where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and or exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 20 percent, except where the above table sets a k-value of 0,0270.</u></p> <p>DE (MS Comments):</p> <p>Please refer to our comment under 1.2.2. concerning the change of ‘and’ to ‘or’. Pigs are very easily exposed to heat stress. To be more in line with Regulation 1/2005 and EFSA opinion, at least 20% more space should be provided at high temperatures.</p> <p>FR (Drafting suggestions):</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>1.3.2. — If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0270.</p> <p>FR (MS Comments): Idem point 1.2.2</p> <p>FR (Drafting suggestions):</p> <p>1.3.2. — If the external temperature is deemed to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not considered with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0270.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>FR (MS Comments): Idem point 1.2.2</p> <p>HU (Drafting suggestions): <u>1.3.2. If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union border control posts, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0270.</u></p> <p>HU (MS Comments): The same applies here as</p> <p>LT (MS Comments): Adjustment of loading density in relation to external temperature must correspond to the requirements of Article 31 on transport of animals in high</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>temperatures. It is hard to evaluate point 1.3.2 not seeing the full text with of the proposal with the last changes applied.</p> <p>LU (MS Comments): LU: cf. 1.2.2.</p> <p>LV (MS Comments): <u>If the external temperature is predicted to be above 30°C at the place of departure or in time of journey, or in the place of destination the transport of animals can't be allowed.</u></p> <p>NL (Drafting suggestions): 1.3.2. If the external temperature is predicted to be above 30°C at the place of departure and or the place of destination, or during the journey, especially and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0270.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>NL (MS Comments): We understand the rationale behind this proposal, but the temperature has a huge effect on the animal welfare. That is why the temperature of the entire journey should be taken into account. We currently practice this in the Netherlands. Operators have to hand in the weather forecast for the planned journey at different time intervals, with a special focus on the hottest periods of the day. Before certification, the weather forecast and planned journey are checked in office. When the temperature along the route rises above 30 degrees somewhere, the operator gets the chance to replan the transport so that the higher temperatures are avoided (for example by leaving earlier). This works really well and we have been doing this for several years. It would be great if a weather forecast app like meteoblue could be integrated into TRACES to help with this check.</p> <p>PL (MS Comments): Comment as above (for bovines)</p> <p>PT (MS Comments): Maintain the text of the current Regulation 1/2005 for adverse conditions:</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>“Sufficient ventilation shall be provided to ensure that the needs of the animals are fully met taking into account in particular the number and type of the animals to be transported and the expected weather conditions during the journey. Containers shall be stored in a way which does not impede their ventilation”</p> <p>SE (Drafting suggestions):</p> <p>1.3.2. If the external temperature is predicted to be above 30°C at the place of departure and <u>or at</u> the place of destination, and <u>or at</u> where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and <u>or at</u> exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10<u>20</u> percent, except where the above table sets a k-value of 0,0270.</p> <p>SE (MS Comments):</p> <p>Please see comments in point 1.2.2.</p>
	<p>PT (MS Comments):</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	Same comments as for the bovines.
<p><u>1.4. Ovine and caprine species</u></p>	<p>AT (MS Comments): For K values and temperatures, see comments under Bovines.</p> <p>HR (MS Comments): See general comment in 1.</p>
<p><u>1.4.1. Space allowance in m² per animal for the transport of ovine and caprine species shall be calculated using the following k-values:</u></p>	<p>LU (MS Comments): LU: ok</p> <p>NL (MS Comments): We would suggest to use just two columns: one for transports up to 9 hours and one for transports of 9 hours and more. The K-value for the transports up to 9 hours should be 0,031 (so that the animals are able to stand an lie down) and the K-value for the transport of 9 hours and more should be 0,037.</p> <p>The time on the RoRo-vessel should counts as well as is proposed by the presidency and the K-value for livestock vessels should stay 0,037 as proposed by the presidency.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>If the above is not possible, then we are in favour of keeping the presidency proposal exactly as it is!!</p>
<p><i>see table 1.4.1 for ovine and caprine animals in document 13246/25</i></p>	<p>BG (MS Comments): The proposed k-values lead to a very big reduction in space allowances for the animal species. Drastically expanding the permitted areas for animal transport will negatively impact the entire agricultural sector. For time < 9 hours on a road or rail vehicle, including on a roll-on-roll-off vessel, the density/ space allowance in m2 per animal should be as defined in the current Regulation 1/2005. The calculation of space allowances should be as much as simple and uniform.</p> <p>DE (Drafting suggestions): Delete table column concerning the categorisation '> 9 – 21 hours'. Change heading of table column '> 21 hours' to '> 9 hours'.</p> <p>DE (MS Comments):</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>Please refer to our general comments at the beginning of the document. We can support the Presidencies proposed k-value of 0,026 for the category ‘< 9 hours’. The k-value of 0,037 should apply above 9 hours’ time spent on vehicles to be in line with EFSA and to protect animals from harm during those long stays and allowing for appropriate thermoregulation, resting behaviour and reaching feed and water.</p> <p>ES (MS Comments):</p> <p>We welcome the introduction of an allometric formula for small ruminants. However, the analysis of the proposed k-values shows that the results are not balanced.</p> <p>Very light animals (lambs and kids under 25 kg) would experience a drastic reduction in space, up to 60–70 % less than under Regulation 1/2005, leading to densities above 80 kg/m², which are incompatible with proper welfare.</p> <p>Conversely, heavy animals would receive excessive space allowances (up to +60 %).</p> <p>We therefore believe that the k-values for small ruminants should be revised or modulated by weight, or that a non-regression safeguard be introduced to ensure that space allowances never fall below the current minimums established in Regulation (EC) 1/2005.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>FR (MS Comments): Pour la détermination des facteurs k par espèce, la France souhaite maintenir les densités actuelles (route/mer) pour l'espèce ovine et caprine</p> <p>FR (MS Comments): For the determination of the “k” factors per species, France wishes to maintain the current densities (road/sea) for the ovine and caprine species.</p> <p>IE (MS Comments): Same comment as for 1.2.2. above.</p> <p>LV (MS Comments): Latvia supports values and space for an animal indicated in the Regulation 1/2005.</p> <p>SE (MS Comments): Similar to SE's proposal for cattle and pigs, SE is of the opinion that EFSA's recommended, and Commission's proposed, k-value of 0.037 for sheep and goats should apply to transports more than nine hours.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	SI (MS Comments): k-value for < 9 hours should be 0,0310 instead of 0,0260
<p><u>1.4.2. If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370.</u></p>	<p>CY (Drafting suggestions):</p> <p>1.4.2. <u>(a) For long journeys, if</u> the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370.</p> <p><u>(b) Paragraph (a) shall not apply when the means of transport is equipped with a temperature control system which allows the temperature ranges in</u></p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p><u>the animal compartment referred to in paragraph 0 of article 31 to be complied with during the whole journey.</u></p> <p>CY (MS Comments): Same rationale as for point 1.2.2.</p> <p>DE (Drafting suggestions):</p> <p><u>1.4.2. If the external temperature is predicted to be above 30°C at the place of departure and or the place of destination, and or where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and-or exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 20 percent, except where the above table sets a k-value of 0,0370.</u></p> <p>DE (MS Comments): Please refer to our comment under 1.2.2. concerning the change of ‘and’ to ‘or’. Out of similar reasons for pigs (please refer to 1.3.2.) we suggest a minimum increase of 20% of space allowance for both unshorn and shorn sheep. In any case, we think that unshorn sheep travelling at temperatures above 30°C require</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>at least 20% more space. Their increased body circumference can impede air circulation in the vehicle and thus lead to problems with thermoregulation.</p> <p>EE (MS Comments): The temperature for unpruned ovine should be considered 26-28 degrees. We understand that this complicates things, however these temperatures are shown that cause heat stress in such animals.</p> <p>ES (MS Comments): Same comment as in Bovine</p> <p>FR (Drafting suggestions): <u>1.4.2. — If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k value of 0,0370.</u></p> <p>FR</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>(MS Comments):</p> <p>Idem point 1.2.2</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>1.4.2. If the external temperature is deemed to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not considered with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0.0370.</p> <p>FR</p> <p>(MS Comments):</p> <p>Idem point 1.2.2</p> <p>GR</p> <p>(Drafting suggestions):</p> <p>1.4.2. (a) For long journeys, If if the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370.</p> <p><u>(b) Paragraph (a) shall not apply when the means of transport is equipped with a temperature control system which allows the temperature ranges in the animal compartment referred to in paragraph 0 of article 31 to be complied with during the whole journey.</u></p> <p>GR (MS Comments): Same rationale as for point 1.2.2.</p> <p>LT (MS Comments): Adjustment of loading density in relation to external Article 31 on transport of animals in high temperatures. It is hard to evaluate point 1.4.2 not seeing the full text with of the proposal with the last changes applied.</p> <p>LU (MS Comments): LU: cf. 1.2.2.</p> <p>LV (MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p><u>If the external temperature is predicted to be above 30°C at the place of departure or in time of journey, or in the place of destination the transport of animals can't be allowed.</u></p> <p>NL (Drafting suggestions):</p> <p>1.4.2. If the external temperature is predicted to be above 30°C at the place of departure and or the place of destination, <u>or during the journey, especially</u> and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370.</p> <p>NL (MS Comments):</p> <p>We understand the rationale behind this proposal, but the temperature has a huge effect on the animal welfare. That is why the temperature of the entire journey should be taken into account. We currently practice this in the Netherlands. Operators have to hand in the weather forecast for the planned journey at different time intervals, with a special focus on the hottest periods of the day.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>Before certification, the weather forecast and planned journey are checked in office. When the temperature along the route rises above 30 degrees somewhere, the operator gets the chance to replan the transport so that the higher temperatures are avoided (for example by leaving earlier). This works really well and we have been doing this for several years. It would be great if a weather forecast app like meteoblue could be integrated into TRACES to help with this check.</p> <p>PL (MS Comments): Comment as above (for bovines)</p> <p>PT (MS Comments): Maintain the text of the current Regulation 1/2005 for adverse conditions: “Sufficient ventilation shall be provided to ensure that the needs of the animals are fully met taking into account in particular the number and type of the animals to be transported and the expected weather conditions during the journey. Containers shall be stored in a way which does not impede their ventilation”</p> <p>SE (Drafting suggestions):</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>1.4.2. If the external temperature is predicted to be above 30°C at the place of departure and <u>or at</u> the place of destination, and <u>or at</u> where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and <u>or at</u> exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10<u>20</u> percent, except where the above table sets a k-value of 0,0370.</p> <p>SE (MS Comments): Please see comments in point 1.2.2.</p>
<p><u>1.4.3. If unshorn ovine animals are transported, the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370.</u></p>	<p>AT (MS Comments): *For unshorn ovine animals, if the external temperature is predicted to be above 30°C ->10 + 10 % = 20%</p> <p>CY (Drafting suggestions):</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>1.4.3. If unshorn ovine animals are transported <u>on long journeys</u>, the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370.</p> <p><u>This increase shall not be applied if an increase has already been applied in accordance with point 1.4.2(a).</u></p> <p>CY (MS Comments): Same rationale as for point 1.2.2. regarding the duration of the journey.</p> <p>Furthermore, we believe that this increase should not be added to the potential increase resulting from the external temperature prediction. In other words, the increases should not be cumulative when unshorn ovine animals are transported and the external temperature is predicted to exceed 30°C.</p> <p>CZ (MS Comments): We do not support the cumulative implementation of space enlargement requirements. However we support increasing of the space allowance in unshorn sheep.</p> <p>DE</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>(Drafting suggestions):</p> <p><u>1.4.3. If unshorn ovine animals are transported, the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370 or in case of point 1.4.2.</u></p> <p>DE</p> <p>(MS Comments):</p> <p>If our above suggestion of an increase of space allowance of at least 20% at high temperatures is taken into account (please refer to 1.4.2.), we consider a further increase in the space available for unshorn animals to be unnecessary.</p> <p>Otherwise, point 1.4.2. and 1.4.3. should be applied cumulatively (10% + 10% = 20%).</p> <p>FI</p> <p>(MS Comments):</p> <p>FI supports summative approach, ie. when predicted temperature is above 30 C and animals are unshorn, the space allowance should be increased 20 %.</p> <p>GR</p> <p>(Drafting suggestions):</p> <p>1.4.3. If unshorn ovine animals are transported <u>on long journeys</u>, the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p><u>This increase shall not be applied if an increase has already been applied in accordance with point 1.4.2(a).</u></p> <p>GR (MS Comments): Same rationale as for point 1.2.2. regarding the duration of the journey.</p> <p>Furthermore, we believe that this increase should not be added to the potential increase resulting from the external temperature prediction. In other words, the increases should not be cumulative when unshorn ovine animals are transported and the external temperature is predicted to exceed 30°C.</p> <p>IE (Drafting suggestions): <u>1.4.3. If unshorn ovine animals are transported, the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370. Where such transport takes place under the conditions specified in point 1.4.2, the space allowance per animal shall be increased by at least 20 percent.</u></p> <p>IE (MS Comments): Scientific studies have shown that the temperature and relative humidity within a lorry that is loaded with livestock can be significantly higher than outside. For</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>example, Wikner and Nilsson (2003)¹ found that the temperatures within the animal compartment of the truck were always higher than outside, and that temperature and relative humidity in the animal compartment were increased with higher stocking densities. Relative humidity greatly potentiates the risk posed to animals from high temperatures during transport. Unshorn sheep transported in such conditions are at risk of heat stress, but this is reduced by a higher space allowance per animal.</p> <p>LT (MS Comments):</p> <p>We would support that 10% increased space allowance for unshorn sheep transportation and 10% increased space allowance for high temperatures should be added together, i.e. 10% + 10% = 20% (animals should have 20% more space).</p> <p>LU (MS Comments):</p> <p>LU: ok</p> <p>LV (Drafting suggestions):</p>

¹ See Wikner, I, and Christer Nilsson. "Assessment of Air Quality in a Commercial Cattle Transport Vehicle in Swedish Summer and Winter Conditions." *DTW. Deutsche Tierärztliche Wochenschrift* 110 (April 1, 2003): 100–104. Available at [\(PDF\) Assessment of air quality in a commercial cattle transport vehicle in Swedish summer and winter conditions \(researchgate.net\)](#)

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Presidency text	Drafting suggestions and MS Comments
	<p><u>1.4.3. If unshorn ovine animals are transported, the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370.</u></p> <p>NL (MS Comments): We are in favour of seeing both the 10% for temperature and the 10% for unshorn sheep as cumulative. Because unshorn sheep just need more space, because they take up more space. And then when transporting unshorn sheep in warm weather, there should also be more space for them to be able to thermoregulate. So when transporting unshorn sheep in warm weather, space allowance should be increased by at least 20%.</p> <p>PT (MS Comments): The % depends on the base value that will be defined.</p> <p>SI (Drafting suggestions): 1.4.3. If unshorn ovine animals are transported, the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 0,0370. In case of external temperature higher than 30°C, another 10 percent should be added.</p> <p>SI</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>(MS Comments):</p> <p>Percents of point 1.4.2. and 1.4.3. must be accumulated. In this case, it is very important that the percentages are added together because sheep in full wool are very sensitive to high temperatures, and it is necessary to further increase the available space at temperatures above 30 degrees.</p>
	<p>DE</p> <p>(MS Comments):</p> <p>If points 1.4.2 and 1.4.3 have to be applied cumulatively (please see our comment on 1.4.3), this should be made clear in a new subparagraph to be inserted here.</p>
<p><u>1.4.4. In case of transport of ovine or caprine animals with horns, space allowance shall be increased on the basis of the above table to accommodate the physical size of all animals and prevent injuries.</u></p>	<p>DE</p> <p>(MS Comments):</p> <p>Please refer to our comment under 1.2.3.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p><u>1.4.4. In case of transport of ovine or caprine animals with horns, space allowance shall be increased on the basis of the above table to accommodate the physical size of all animals and prevent injuries.</u></p> <p>FR</p> <p>(MS Comments):</p> <p>Cf point 1.1.3</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>FR (Drafting suggestions): <u>1.4.4. In case of transport of ovine or caprine animals with horns, space allowance shall be increased on the basis of the above table to accommodate the physical size of all animals and prevent injuries.</u></p> <p>FR (MS Comments): See point 1.1.3</p> <p>IE (Drafting suggestions): <u>1.4.4. In case of transport of ovine or caprine animals with horns, space allowance shall be increased on the basis of the above table by 20 percent or more in accordance with the size of the horns, to accommodate the physical size of all animals and prevent injuries.</u></p> <p>IE (MS Comments): The table referred to does not mention horned animals. Perhaps we should consider also offering some guidance such as “20% or more” as suggested.</p> <p>LT (MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>Rewording is needed either of this point or the table (i.e. may be by adding the categories of the animals). Currently there is no relevance between physical size of the animal and presence/absence of horns. k-values are not provided for different size of the animals.</p> <p>LU (MS Comments): LU: ok</p> <p>RO (MS Comments): Clarifying details should be provided. Additional space allowed to be provided for ovine and caprine animals with horns as compared to animals without horns should be given as a percentage.</p>
<p><u>1.5. Weaned farmed lagomorphs</u></p>	<p>AT (MS Comments): As there are currently no specific requirements for lagomorphs, corresponding regulations are expressly to be welcomed. For AT, the transport of lagomorphs plays a minor role and must still be discussed internally with the sector.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
<p><u>1.5.1. Space allowance in cm² per animal for the transport of weaned farmed lagomorphs shall be calculated using the following k-values:</u></p>	<p>ES (MS Comments): We appreciate that the Presidency has included specific figures for rabbits, but we are not fully convinced by the approach for rabbits, as we believe they end up in a worse position compared to the current situation.</p> <p>HR (MS Comments): See general comment in 1.</p> <p>LU (MS Comments): LU: ok</p> <p>NL (MS Comments): We would suggest to use just two columns: one for transports up to 12 hours and one for transports of 12 hours and more. The space allowance for the transports up to 12 hours should be 270 and the space allowance for the transport of 12 hours and more should be 350. The time on the RoRo-vessel should counts as well as is proposed by the presidency.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>If the above is not possible, then we are in favour of keeping the presidency proposal exactly as it is!!</p> <p>PT (MS Comments):</p> <p>We believe that although an increase in space per animal is envisaged, this must be balanced and must not compromise the sustainability of live animal transport. In addition, other factors must be taken into account, namely environmental sustainability and the need to make animal transport as efficient as possible. A balance is therefore needed between animal welfare, sustainability, efficiency, and economic and environmental impacts.</p>
<p><i>see table 1.5.1. for weaned farmed lagomorphs in document 13246/25</i></p>	<p>BG (MS Comments):</p> <p>The proposed k-values lead to a very big reduction in space allowances for the animal species. Drastically expanding the permitted areas for animal transport will negatively impact the entire agricultural sector. For time < 12 hours on a road or rail vehicle, including on a roll-on-roll-off vessel, the density/ space allowance in cm² per animal for the transport of weaned farmed lagomorphs should be as defined in the current Regulation 1/2005.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>The calculation of space allowances should be as much as simple and uniform.</p> <p>DE (Drafting suggestions): Change ‘Time on a road or rail vehicle, including on a roll-on-roll-off vessel’ to ‘Time in a container’. Change k-value for < 12 hours to 270. Delete table column concerning the categorisation ‘> 12 – 36 hours’. Change heading of table column ‘> 36 hours’ to ‘> 12 hours’.</p> <p>DE (MS Comments): Crowding stress should be prevented by counting the time the animals spend in the container. According to EFSA opinion a k-value of 270 should be regarded as an absolute minimum for space allowance in rabbits, with them requiring more space on long journeys and at high temperatures. We consider the k-value of 350 proposed by the Presidency to be appropriate and suggest that this value should be used if the rabbits are likely to spend more than 12 hours in the containers.</p> <p>FR (MS Comments): La France demande un droit de réserve, afin d’obtenir les valeurs des bonnes pratiques actuelles</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>FR (MS Comments): France requests a right of reserve, in order to obtain the values of current good practices</p> <p>LV (MS Comments): Latvia supports values and space for an animal indicated in the Regulation 1/2005.</p> <p>SE (MS Comments): As there is currently no EU legislation for the transport of lagomorphs, SE support EFSA's recommended space requirements for all transport lengths.</p>
<p><u>1.5.2. If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points</u></p>	<p>CY (Drafting suggestions): 1.5.2. (a) For long journeys, If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where</p>

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Presidency text	Drafting suggestions and MS Comments
<p><u>from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 350.</u></p>	<p>relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 350.</p> <p><u>(b) Paragraph (a) shall not apply when the means of transport is equipped with a temperature control system which allows the temperature ranges in the animal compartment referred to in paragraph 0 of article 31 to be complied with during the whole journey.</u></p> <p>CY (MS Comments): Same rationale as for point 1.2.2.</p> <p>DE (Drafting suggestions): <u>1.5.2. If the external temperature is predicted to be above 30 25°C at the place of departure and or the place of destination, and or where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and-or exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space</u></p>

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Presidency text	Drafting suggestions and MS Comments
	<p><u>allowance per animal shall be increased by at least 1020 percent, except where the above table sets a k-value of 350.</u></p> <p>DE (MS Comments):</p> <p>Rabbits are particularly susceptible to heat stress. Therefore, they need to be able to thermoregulate appropriately already at lower temperatures of 25°C. If our suggestion for a higher k-value of 270 below 12 hours is taken to account, we consider at least 10% more space at high temperatures to be appropriate. Otherwise, we suggest at least 20% more so that rabbits can assume a fully stretched out lying position for thermoregulation. Concerning assembly centres for lagomorphs we see an inconsistency with Animal Health Law (please refer to our previous comments on Chapter VI ST 7372/25).</p> <p>FR (Drafting suggestions):</p> <p><u>1.5.2. If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space</u></p>

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Presidency text	Drafting suggestions and MS Comments
	<p>allowance per animal shall be increased by at least 10 percent, except where the above table sets a k value of 350.</p> <p>FR (MS Comments): Idem point 1.2.2</p> <p>FR (Drafting suggestions): <u>1.5.2. If the external temperature is deemed to be above 30oC at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not considered with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k value of 350.</u></p> <p>FR (MS Comments): Idem point 1.2.2</p> <p>GR (Drafting suggestions):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>1.5.2. <u>(a) For long journeys,</u> if the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 350.</p> <p><u>(b) Paragraph (a) shall not apply when the means of transport is equipped with a temperature control system which allows the temperature ranges in the animal compartment referred to in paragraph 0 of article 31 to be complied with during the whole journey.</u></p> <p>GR (MS Comments): Same rationale as for point 1.2.2.</p> <p>LT (MS Comments): Adjustment of loading density in relation to external Article 31 on transport of animals in high temperatures. It is hard to evaluate point 1.5.2 not seeing the full text with of the proposal with the last changes applied.</p> <p>LU</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>(MS Comments):</p> <p>LU: cf. 1.2.2.</p> <p>LV</p> <p>(MS Comments):</p> <p><u>If the external temperature is predicted to be above 30°C at the place of departure or in time of journey, or in the place of destination the transport of animals can't be allowed.</u></p> <p>NL</p> <p>(Drafting suggestions):</p> <p>1.5.2. If the external temperature is predicted to be above 30°C at the place of departure and<u>or</u> the place of destination, <u>or during the journey, especially</u> and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 350.</p> <p>NL</p> <p>(MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>We understand the rationale behind this proposal, but the temperature has a huge effect on the animal welfare. That is why the temperature of the entire journey should be taken into account. We currently practice this in the Netherlands. Operators have to hand in the weather forecast for the planned journey at different time intervals, with a special focus on the hottest periods of the day. Before certification, the weather forecast and planned journey are checked in office. When the temperature along the route rises above 30 degrees somewhere, the operator gets the chance to replan the transport so that the higher temperatures are avoided (for example by leaving earlier). This works really well and we have been doing this for several years. It would be great if a weather forecast app like meteoblue could be integrated into TRACES to help with this check.</p> <p>PL (MS Comments): Comment as above (for bovines)</p> <p>PT (MS Comments): Maintain the text of the current Regulation 1/2005 for adverse conditions: “Sufficient ventilation shall be provided to ensure that the needs of the animals are fully met taking into account in particular the number and type of the animals to be transported and the expected weather conditions during the</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>journey. Containers shall be stored in a way which does not impede their ventilation”</p> <p>SE (Drafting suggestions):</p> <p>1.5.2. If the external temperature is predicted to be above 30°C at the place of departure and <u>or at</u> the place of destination, and <u>or at</u> where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and <u>or at</u> exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10<u>20</u> percent, except where the above table sets a k-value of 350.</p> <p>SE (MS Comments):</p> <p>In line with comments in point 1.2.2. SE believe that <u>and</u> should be replaced with <u>or at</u> in three places in the paragraph. SE also propose that COM's proposal for 20% more space when the temperature exceeds 30 degrees should apply instead of 10 %.</p>

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Presidency text	Drafting suggestions and MS Comments
<p><u>1.6. Poultry other than day-old chicks</u></p>	<p>AT (MS Comments): Austria would like to express its reservation regarding the new k-value for poultry.</p> <p>CZ (MS Comments): Space requirements should also take into account differences between the transport of different categories of poultry (e.g., the significant difference between transporting chickens and geese) and transport using peer systems (in tiers) or in containers.</p> <p>HR (MS Comments): See general comment in 1.</p> <p>LU (MS Comments): _LU: ok</p>
<p><u>1.6.1. Space allowance in cm² per animal for the transport of poultry other than day-old chicks shall be calculated using the following k-values:</u></p>	<p>ES (MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>We underline that, for these categories, temperature and ventilation control remain the key factors to ensure animal welfare during transport.</p> <p>LU (MS Comments): LU: ok</p> <p>NL (MS Comments): We would suggest to use just two columns: one for transports up to 12 hours and one for transports of 12 hours and more. The space allowance for the transports up to 12 hours should be 240 and the space allowance for the transport of 12 hours and more should be 290. The time on the RoRo-vessel should count as well as is proposed by the presidency.</p> <p>If the above is not possible, then we are in favour of keeping the presidency proposal exactly as it is!!</p> <p>PT (MS Comments): We believe that although an increase in space per animal is envisaged, this must be balanced and must not compromise the sustainability of live animal transport.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>In addition, other factors must be taken into account, namely environmental sustainability and the need to make animal transport as efficient as possible. A balance is therefore needed between animal welfare, sustainability, efficiency, and economic and environmental impacts.</p>
<p><i>see table 1.6.1. for poultry other than day-old chicks in document 13246/25</i></p>	<p>BG (MS Comments):</p> <p>The proposed k-values lead to a very big reduction in space allowances for the animal species. Drastically expanding the permitted areas for animal transport will negatively impact the entire agricultural sector. For time < 12 hours on a road or rail vehicle, including on a roll-on-roll-off vessel, the density/ space allowance in cm² per animal for the transport of poultry other than day-old chicks should be as defined in the current Regulation 1/2005.</p> <p>The calculation of space allowances should be as much as simple and uniform.</p> <p>DE (Drafting suggestions):</p> <p>Change ‘Time on a road or rail vehicle, including on a roll-on-roll-off vessel’ to ‘Time in a container’.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>Delete table column concerning the categorisation '> 12 – 21 hours'. Change heading of table column '> 21 hours' to '> 12 hours'.</p> <p>DE (MS Comments): Please refer to our comments under 1.5.1. (time in containers as reference) and under 'General comments' at the beginning of the document (in favour of only two species-specific k-values). We consider the lower k-value of 195 for > 12 hours in a container to be proportionate even though the space allowance for poultry with a bodyweight of 1,5 kg, 2,5 kg or above 20 kg is reduced by 5%, 10% and 30%, respectively, compared to Regulation 1/2005. The higher k-value of 290 in line with EFSA should already account for > 12 hours. Maximum intervals for feeding and hydration feeding and hydration of the animals are set at 12 hours. Therefore, the space provided shall allow for moving of the animals in the container to reach hydration and feed.</p> <p>FI (MS Comments): We suggest same time limits for all species, ie. for poultry < 9 h, 9-21 h and > 21 h</p> <p>FR (MS Comments): La France ne souhaite pas aller au-delà d'une valeur k de 220.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>La France demande un droit de réserve, afin d'obtenir les valeurs des bonnes pratiques actuelles pour toutes les différentes espèces de volaille.</p> <p>FR (MS Comments): France does not want to go beyond a k-value of 220. France requests a right of reserve, in order to obtain the values of current good practices for all the different poultry species.</p> <p>LV (MS Comments): Latvia supports values and space for an animal indicated in the Regulation 1/2005.</p> <p>SE (MS Comments): For all transport of poultry over 12 hours, SE suggest that EFSA recommendation and COM proposed k-value should apply, i.e. 290.</p> <p>SI (MS Comments): k-value for < 9 hours should be 240 instead of 195</p>

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Presidency text	Drafting suggestions and MS Comments
<p><u>1.6.2. If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 290.</u></p>	<p>CY (Drafting suggestions):</p> <p>1.6.2. (a) For long journeys, If if the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 290.</p> <p><u>(b) Paragraph (a) shall not apply when the means of transport is equipped with a temperature control system which allows the temperature ranges in the animal compartment referred to in paragraph 0 of article 31 to be complied with during the whole journey.</u></p> <p>CY (MS Comments):</p> <p>Same rationale as for point 1.2.2.</p> <p>DE (Drafting suggestions):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p><u>1.6.2. If the external temperature is predicted to be above 30 25°C at the place of departure and or the place of destination, and or where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and or exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 20 percent, except where the above table sets a k-value of 290.</u></p> <p>DE (MS Comments): Poultry is very susceptible to heat stress and already have problems thermoregulating at temperatures below 30°C. For this reason, the maximum internal temperature inside the animal compartment is lower in poultry than for other animals (please refer to Art. 31(0)(c) of ST 9298/25). For short journeys, under given lower k-value of 195, the space should be increased by at least 20%. This should in particular compensate the lower space allowances compared with Regulation 1/2005 for vulnerable animals destined for slaughter with approx. average body weights of 2,5 kg (chicken broilers), 1,5 kg (spent hens) and 10/20 kg (female/male turkeys for slaughter). Otherwise, there will be an unacceptable deterioration compared to Regulation 1/2005.</p> <p>FI</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>(Drafting suggestions):</p> <p><u>1.6.2. If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except if transport is less than 9 hours or where the above table sets a k-value of 290.</u></p> <p>FI</p> <p>(MS Comments):</p> <p>Poultry transports are typically planned more than one week before transport, which makes hard to take the temperature into consideration. Only small amount of birds cannot be let at farm, this means, that during summer times, the space allowances must be all the time planned 10 % higher just in case warm weather should occur.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p><u>1.6.2. If the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between</u></p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p><u>Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 290.</u></p> <p>FR (MS Comments): Idem point 1.2.2</p> <p>FR (Drafting suggestions): <u>1.6.2. — If the external temperature is deemed to be above 30oC at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not considered with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 290.</u></p> <p>FR (MS Comments): Idem point 1.2.2</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>GR (Drafting suggestions):</p> <p>1.6.2. (a) For long journeys, if the external temperature is predicted to be above 30°C at the place of departure and the place of destination, and where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 290.</p> <p><u>(b) Paragraph (a) shall not apply when the means of transport is equipped with a temperature control system which allows the temperature ranges in the animal compartment referred to in paragraph 0 of article 31 to be complied with during the whole journey.</u></p> <p>GR (MS Comments):</p> <p>Same rationale as for point 1.2.2.</p> <p>LT (MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>Adjustment of loading density in relation to external Article 31 on transport of animals in high temperatures. It is hard to evaluate point 1.6.2 not seeing the full text with of the proposal with the last changes applied.</p> <p>LU (MS Comments): LU: cf. 1.2.2.</p> <p>LV (MS Comments): <u>If the external temperature is predicted to be above 30°C at the place of departure or in time of journey, or in the place of destination the transport of animals can't be allowed.</u></p> <p>NL (Drafting suggestions): 1.6.2. If the external temperature is predicted to be above 30°C at the place of departure and <u>or</u> the place of destination, <u>or during the journey, especially and</u> where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>per animal shall be increased by at least 10 percent, except where the above table sets a k-value of 290.</p> <p>NL (MS Comments): We understand the rationale behind this proposal, but the temperature has a huge effect on the animal welfare. That is why the temperature of the entire journey should be taken into account. We currently practice this in the Netherlands. Operators have to hand in the weather forecast for the planned journey at different time intervals, with a special focus on the hottest periods of the day. Before certification, the weather forecast and planned journey are checked in office. When the temperature along the route rises above 30 degrees somewhere, the operator gets the chance to replan the transport so that the higher temperatures are avoided (for example by leaving earlier). This works really well and we have been doing this for several years. It would be great if a weather forecast app like meteoblue could be integrated into TRACES to help with this check.</p> <p>PL (MS Comments): Comment as above (for bovines)</p> <p>PT (MS Comments):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>Maintain the text of the current Regulation 1/2005 for adverse conditions: “Sufficient ventilation shall be provided to ensure that the needs of the animals are fully met taking into account in particular the number and type of the animals to be transported and the expected weather conditions during the journey. Containers shall be stored in a way which does not impede their ventilation”</p> <p>SE (Drafting suggestions):</p> <p>1.6.2. If the external temperature is predicted to be above 30°C at the place of departure and <u>or at</u> the place of destination, and <u>or at</u> where relevant at assembly centres, ports, airports, control posts, border crossings between Member States, border crossings between third countries and <u>or at</u> exit points from the Union, and the means of transport is not equipped with a temperature control system as described in Article 31(1b), the space allowance per animal shall be increased by at least 10<u>20</u> percent, except where the above table sets a k-value of 290.</p> <p>SE (MS Comments):</p> <p>In line with comments on point 1.2.2 SE believe that <u>and</u> should be replaced with <u>or at</u> in three places in the paragraph. It should be enough that the</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>temperature is above 30 degrees at one of these places for the requirement for more space should be applicable. SE also propose that COM's proposal for 20% more space when the temperature exceeds 30 degrees should apply instead of 10 %.</p>
<p><u>2. Space allowance for the transport by road, rail, sea or air of equines, day-old chicks, unweaned farmed lagomorphs and dogs and cats</u></p>	<p>HU (Drafting suggestions):</p> <p><u>2. Space allowance for the transport by road, rail, sea or air of equines, day-old chicks, unweaned farmed lagomorphs and dogs and cats</u></p>
<p><u>2.1. Space allowance for transport of equine species</u></p>	<p>FI (MS Comments):</p> <p>During existence of current legislation 1/2005 the most difficult issue has been interpreting when a horse transport is such that the regulation applies. This has to be simplified in this revision. Horses are transported for so many various reasons, that they really differ from other species. It should be considered that a breeding stallion can be simultaneously a race horse or competing in another horse sport. It should also be considered that breeding mares can become breeding mares simultaneously they are still used for racing or eventing etc.</p> <p>HR</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>(MS Comments):</p> <p>HR supports to maintain the current values for space allowance as laid down in 1/2005</p> <p>SE</p> <p>(MS Comments):</p> <p>General comment: It is important that horses have enough space when transported. However, the proposed space requirements may have major practical and financial consequences. Most of the proposed dimensions do not match today's commercial manufacturing dimensions for several different types of horse transport. Changing to these dimensions would have a major impact on the entire European horse industry. Horses (other than horses bred solely for slaughter) are transported almost exclusively in individual stalls. Simply reducing the number of horses loaded onto one transport to meet a higher space requirement is therefore not a viable solution.</p> <p>Although sufficient space is important for horses, there is a lack of research showing that the transport measures used today for sport/competition or breeding horses have a negative impact on horse welfare. Horses for breeding and competition horses are many times the same horses and they are nevertheless transported in the same vehicles with the same measurements. All competition horses are inspected by veterinarians before or in connection with</p>

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Presidency text	Drafting suggestions and MS Comments
	the start and there are no indications in SE that the transports cause injuries or affects the horses negatively.
<p><u>2.1.1. When equines are transported in groups or when a mare is transported with her foal, the stocking density in the animal compartment or in the pen shall not exceed 200 kg/m².</u></p>	<p>AT (MS Comments): The increased space allowance for horses transported in groups is generally welcomed, but the new provisions still need to be agreed/discussed with the horse sector.</p> <p>BG (MS Comments): It may be necessary to consider whether, after introducing a requirement for space allowance when transporting equines in groups and mares with their foals, there should be criteria for minimum width and length of accommodation compartments.</p> <p>ES (MS Comments): The current system under Regulation (EC) 1/2005 already provides adequate and safe space for adult horses and ensures a level playing field among operators.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>Introducing specific exemptions or categories could undermine the principle of equal treatment.</p> <p>We therefore supports maintaining the current approach with possible minor technical adjustments only if they demonstrably improve welfare</p> <p>FR (MS Comments): La France demande un droit de réserve, afin d’obtenir les valeurs des bonnes pratiques actuelles</p> <p>FR (MS Comments): France requests a right of reserve, in order to obtain the values of current good practices</p> <p>LU (MS Comments): LU: ok</p> <p>LV (MS Comments): Latvia supports values and space for an animal indicated in the Regulation 1/2005.</p> <p>SE (Drafting suggestions):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>2.1.1. When equines are transported in groups or when a mare is transported with her foal, the stocking density in the animal compartment or in the pen shall not exceed 200 kg/m². <u>When transporting horses in groups, only animals that are used to each other should be transported together and the group size should not exceed four horses in each compartment. The back hooves must be unshod.</u></p>
<p><u>2.1.2. When equine species are transported in individual stalls², the width of the stall shall allow for at least 20 cm on each side of the animal where the animal is widest. The length of the stall shall allow for at least 50 cm of free space in front of the head of the animal while the neck is parallel to the ground.</u></p>	<p>AT (MS Comments): We have concerns, as normal horse trailers currently find it difficult to comply with these regulations. 20 cm on both sides seems excessive, as current horse trailers offer 0.7–0.8 m.</p> <p>BE (MS Comments): The additional space in front of the horse will mean it is no longer possible to transport horses in a sideways or herringbone position, since the width of the vehicle is limited. We would like to keep the possibility to transport horses in</p>

² A new point 5.2a will be added in Chapter III of Annex I: “Animals of the equine species other than unbroken horses and mares with their foals shall be transported in individual stalls.”

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Presidency text	Drafting suggestions and MS Comments
	<p>these positions. Additionally, providing a lot of space for horses can become a safety issue if the animals start panicking.</p> <p>BG (MS Comments):</p> <p>1. „Where the animal is widest” – it is very relatively for definition and may be reason for different approach in controls.</p> <p>2. The maximum width of trucks in Europe and the UK is 2.55 meters. The length of horses without a straight neck can reach 2.6 meters or more. If a requirement for additional 50 cm of free space in front of the head of a horse with a straight neck will be placed, the previously applied practices for placing individual horse stalls across the length of the trucks will be completely changed. It is not clear what the practical solutions will be to meet such a requirement.</p> <p>EE (MS Comments):</p> <p>Horses are very different on their physical measurements, and we do need to consider the difference between work-line horses and the horses meant for sport. These new rules would mean many different sizes of transport stalls and financial burden on the owner owning a large work-line horse. Furthermore, larger stall can lead to more fallings and possibly more traumas. EE suggest decrease in these numbers.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>FI (Drafting suggestions):</p> <p><u>When equine species are transported in individual stalls less than 9 hours the horse must be able to stand in its normal position.</u></p> <p><u>When equine species are transported in individual stalls 9-21 hours the width of the stall shall allow for at least 10 cm on each side of the animal where the animal is widest. The length of the stall shall allow for at least 20 cm of free space in front of the head of the animal while the neck is in neutral position parallel to the ground.</u></p> <p><u>When equine species are transported in individual stalls more than 21 hours, the width of the stall shall allow for at least 20 cm on each side of the animal where the animal is widest. The length of the stall shall allow for at least 50 cm of free space in front of the head of the animal while the neck is in neutral position parallel to the ground.</u></p> <p>FI (MS Comments):</p> <p>Journey time must be considered here also using risk based approach. The horses can also be transported also diagonally, not always longitudinally, which should also be considered. During transport the horses do not stand having their neck in vertical position. When transported in individual stalls, horses can</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>balance themselves by leaning to walls. Some individuals do not like touching the walls, but they are known and can be transported accordingly.</p> <p>FR (Drafting suggestions):</p> <p>2.1.2. When equine species are transported in individual stalls, <u>the animal transported must not rub on either side of the walls and must be able to lengthen the neckline, including when a haystack is suspended in front of.</u> the width of the stall shall allow for at least 20 cm on each side of the animal where the animal is widest. The length of the stall shall allow for at least 50 cm of free space in front of the head of the animal while the neck is parallel to the ground.</p> <p>FR (MS Comments):</p> <p>La France propose de définir une obligation de résultats.</p> <p>FR (Drafting suggestions):</p> <p>2.1.2. When equine species are marked in individual stalls, <u>the animal must not rub on either side of the walls and must be able to lengthen the neckline, including when a haystack is marked in front of.</u> the width of the stall shall allow for at least 20 cm on each side of the animal where the animal is widest.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>The length of the stall shall allow for at least 50 cm of free space in front of the head of the animal while the neck is parallel to the ground.</p> <p>FR (MS Comments): France proposes to define an obligation of results.</p> <p>HR (MS Comments): HR does not support measurements as proposed in this text</p> <p>LU (MS Comments): LU: ok</p> <p>PL (MS Comments): We do not think it is necessary to have individual stalls for horses, as it is enough if they are tied. Also, we agree with comments made by other delegations, i.e. the means of transported is approved when it is empty. We would prefer to see a value concerning the surface area per horse (expressed as k-value or as kg/m² to ensure easier implementation and control).</p> <p>SE (Drafting suggestions):</p>

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Presidency text	Drafting suggestions and MS Comments																														
	<p>2.1.2. When equine species are transported in individual stalls¹ and the transport time is ≤ 9 hours, <u>the measurements shall be at least</u> width of the stall shall allow for at least 20 cm on each side of the animal where the animal is widest. The length of the stall shall allow for at least 50 cm of free space in front of the head of the animal while the neck is parallel to the ground.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #c6e0b4;">Height of the horse</th> <th style="background-color: #c6e0b4;">Individual stall width* (m)</th> <th style="background-color: #c6e0b4;">Individual stall total length* (m)</th> <th style="background-color: #c6e0b4;"></th> <th style="background-color: #c6e0b4;"></th> </tr> </thead> <tbody> <tr> <td><130 cm</td> <td>0,75</td> <td>2,0</td> <td></td> <td></td> </tr> <tr> <td>130-150 cm</td> <td>0,8</td> <td>2,2</td> <td></td> <td></td> </tr> <tr> <td>151-160 cm</td> <td>0,9</td> <td>2,3</td> <td></td> <td></td> </tr> <tr> <td>161-170</td> <td>0,95</td> <td>2,5</td> <td></td> <td></td> </tr> <tr> <td>>170 cm</td> <td>1,0</td> <td>2,6</td> <td></td> <td></td> </tr> </tbody> </table> <p><u>Individual stalls must be designed in such a way that the animals are protected from impact. When placing several horses in width, there must be a partition wall along the entire length of the stall. The partition wall shall, without obstruction, in the front part of the stall and in front of the support</u></p>	Height of the horse	Individual stall width* (m)	Individual stall total length* (m)			<130 cm	0,75	2,0			130-150 cm	0,8	2,2			151-160 cm	0,9	2,3			161-170	0,95	2,5			>170 cm	1,0	2,6		
Height of the horse	Individual stall width* (m)	Individual stall total length* (m)																													
<130 cm	0,75	2,0																													
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Presidency text	Drafting suggestions and MS Comments
	<p><u>be of such a height that the horses cannot bite each other. This does not apply if the horses being transported are not hostile to each other. Horses may not be transported in vehicles with more than one plane.</u></p> <p><i>* These figures may vary by a maximum of 20 % depending not only on the horses' weight and measurements but also on their physical condition, the meteorological conditions and the likely journey time and interval between rest.</i></p> <p>SE (MS Comments):</p> <p>Many of the means of transport used to transport horses today do not allow a free space of 40-50 cm in front of or 20 cm on each side of horses being transported (in case the vehicle is built for two horses like trailers or small trucks. To get 50 cm in front of the nose of the horse, the space in which the horse stands would have to be 3 meters long in many cases. Horses that are transported sideways in a truck have less space in front of them, but they are also not exposed to the direction of force to the head in the event of braking. In SE, there is a requirement that there must be a barrier 60 cm from the front wall in cases where the horse is transported in the direction of travel (facing forward). This is to avoid retardation leading to the horse hitting its head against the wall. The barrier then slows down the chest and by extension the largest mass of the animal. However, horses need to be able to lower their head during transport.</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>SE suggest a requirement of 20 cm in front of the horse in an individual space when it has its head in a natural position. In addition, they should be given the opportunity to take a natural position and lower their head during transport for transports longer than nine hours. <i>Austin et al. (1995) analyzed the clinical records and potential exposure to risk factors of horses with pleuropneumonia in a case control study (45 cases and 180 controls) in Australia. The results indicated that animals that had been transported for more than 805 km (~ 10 h) in the previous week were at higher risk of developing pleuropneumonia.</i></p> <p>At supervision every 4.5 hours, the horses can be unleashed (from cross-ties) or unloaded and given the opportunity to lower their heads and if relevant ingest feed and water. If this is not carried out, the space must allow 40 cm in front of the nose of the horse in a natural position.</p> <p>SI (MS Comments):</p> <p>The width of the vehicle or trailer is likely to be too narrow to allow the animals to be placed perpendicular to the vehicle. The animals will have to be placed sideways or parallel to the vehicle, which will greatly reduce the number of animals on the vehicle or will worsen animal welfare conditions.</p>
	<p>SE (Drafting suggestions):</p>

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Presidency text	Drafting suggestions and MS Comments
	<p><u>2.1.3 When unhandled horses, horses breed for meat production and horses on transport to slaughter are transported in individual stalls or when horses are transported >9 hours in individual stalls, the width of the stall shall allow for at least 20 cm on each side of the animal where the animal is widest. The length of the stall shall allow for at least 50 cm of free space in front of the head of the animal while the neck is parallel to the ground.</u></p> <p>SE (MS Comments): Horses on transport to slaughter and unhandled horses are vulnerable categories and it is important that their welfare are safeguarded during transport and that the space requirements are suited to the animal’s needs.</p>
<p><u>2.1.3. [Air transport of equines – to be decided]</u></p>	<p>PT (MS Comments): We believe that IATA rules should be made public so that we can analyse them.</p> <p>RO (MS Comments): In our opinion, these provisions should be harmonized with International Air Transport Association technical rules set out in Live Animals Regulations, as transport by air can be carried out only by transporters that are members of IATA.</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
<p><u>2.2. The space allowance for transport of day-old chicks shall be at least 21 cm² per chick.</u></p>	<p>AT (MS Comments): The specifications for day-old chicks simplify the current regulation (Regulation (EC) No 1/2005: 21–25 cm²) and remove the upper limit.</p> <p>DE (Drafting suggestions): <u>2.2. The space allowance for transport of day-old chicks shall be at least 21 25 cm² per chick.</u></p> <p>DE (MS Comments): We suggest a minimum of 25 cm² as this is still in line with the Regulation 1/2005 and allows for more space for larger poultry such a geese and turkeys.</p> <p>ES (MS Comments): We think the welfare of day-old chicks depends mainly on maintaining adequate and stable temperature and humidity, rather than the available space itself.</p> <p>IE</p>

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Presidency text	Drafting suggestions and MS Comments
	<p>(Drafting suggestions):</p> <p><u>2.2. The space allowance for transport of day-old chicks shall be at least 21 cm² per chick or at least 25 cm² for duck chicks.</u></p> <p>IE (MS Comments): Duckling chicks are typically larger than chicks of Gallus gallus.</p> <p>LU (MS Comments): LU: no comment</p> <p>LV (MS Comments): Latvia supports values and space for an animal indicated in the Regulation 1/2005.</p> <p>PT (MS Comments): We have doubts about this paragraph. In Reg 1/2005, it was 21 to 25 cm². Turkey and duck chicks are larger than chicken chicks. Should it not remain as it was in Reg 1/2005? We believe that this sentence should be improved to define, at least, the minimum space per animal for the most commonly transported species (e.g. day-old chicks, day-old ducks and day-old turkeys). As it stands, it allows, at the</p>

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Presidency text	Drafting suggestions and MS Comments
	very least, day-old ducks and turkeys to be transported with 21 cm ² , which is insufficient.
<p><u>2.3. Where unweaned farmed lagomorphs are transported in their nest, the space allowance shall be sufficient to accommodate the nest and preserve the thermal comfort and air circulation.</u></p>	<p>AT (MS Comments): As there are currently no specific requirements for lagomorphs, corresponding regulations are expressly to be welcomed. For AT, the transport of lagomorphs plays a minor role and must still be discussed internally with the sector.</p> <p>LU (MS Comments): LU: no comment</p>
<p><u>2.4. For dogs and cats transported in containers, the space allowance shall meet at least the following requirements:</u></p>	<p>AT (MS Comments): OK</p> <p>DE (MS Comments): We support the introduction of minimum requirements for dogs and cats.</p> <p>EE (MS Comments):</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>The general approach is welcomed by EE – size of different breeds of dogs and cats can vary, and it is hard to make an easy suggestion. However, we do see problem in point iii.</p> <p>Furthermore, it is not very clear, if these animals need to be transported alone in the carrier or one container can have multiple animals inside of it, if these requirements are filled.</p> <p>FR (MS Comments): La France demande un droit de réserve, afin d’obtenir les valeurs des bonnes pratiques actuelles</p> <p>FR (MS Comments): France requests a right of reserve, in order to obtain the values of current good practices</p> <p>LU (MS Comments): LU: ok</p> <p>NL (Drafting suggestions): 2.4. For dogs and cats transported in containers, the space allowance shall meet at least the following requirements:</p>

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From: AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FR, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI

Presidency text	Drafting suggestions and MS Comments
	<p>NL (MS Comments): We greatly appreciate the work done by the presidency on the space allowance of dogs and cats. We do however have some suggestions based on the recommendations of the Voluntary Initiative group for the welfare of dogs and cats. We would suggest to not only determine this space allowance for dogs and cats transported in containers, because in our experience especially dogs are not only transported in containers. Often they can be transported in vans in which they are placed in the back without any containers, crates or kennels. Even though we do not prefer this type of transport, we would suggest to also let the rules about space allowance work for dogs and cats that are not transported in containers.</p>
<p><u>i. The animal is able to assume standing and sitting posture without being in any way obstructed by the structure of the container.</u></p>	<p>IE (Drafting suggestions): i. The animal is able to assume standing and sitting posture, and to turn around, without being in any way obstructed by the structure of the container. LU (MS Comments): LU: ok</p>

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Presidency text	Drafting suggestions and MS Comments
	NL (Drafting suggestions): i. The animal is able to assume standing and sitting posture <u>while holding the head in a natural position.</u> without being in any way obstructed by the structure of the container.
<u>ii. The animal is able to assume sternal recumbency.</u>	LU (MS Comments): LU: ok
<u>iii. The internal width of the container is at least twice the width of the animal at the widest point.</u>	EE (MS Comments): This point is giving the approximate measures to the carrier for the animal. However, in real life, it will be hard to measure, confirm and to control. If this is left as vague as it is, this will cause concern for controls as for the transporters. Our suggestion is to have the measurements for containers based on the kilograms of an animals, to have easier and more reliable systems for small animals transport. IE (Drafting suggestions):

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Presidency text	Drafting suggestions and MS Comments
	<p>iii. <u>The internal width of the container is at least twice the width of the animal at the widest point of the animal.</u></p> <p>LU (MS Comments): LU: ok</p> <p>NL (Drafting suggestions):</p> <p>iii. <u>For dogs and cats transported in containers</u> the internal width of the container is at least twice 2,5 the width of the animal at the widest point. <u>When multiple animals are transported within one container, the space allowance will be accumulated per animal.</u></p> <p>NL (MS Comments): Often dogs, especially pups, are transported with more than one animal in a container. That is why we would suggest to accumulate the space allowance for the animals when there is more than one animal per container. The 2,5 is a recommendation from the Voluntary Initiative group for the welfare of dogs and cats.</p> <p>SE (Drafting suggestions):</p>

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Presidency text					Drafting suggestions and MS Comments				
					iii. The internal width of the container is at least twice 2,5 times the width of the animal at the widest point. SE (MS Comments): ISE has a national requirement that the width of the container for transporting dogs must be 2.5 times the chest width. There is a risk that thin long-legged breeds such as the Saluki will find it difficult to lie on their side with their legs stretched out in a container with a width of only 2 times the dog's widest measurements.				
<u>Iv. The animal is able to turn around and shall have free access to water and feed if provided in the container.</u>					IE (Drafting suggestions): <u>iv. The animal is able to turn around and shall have free access to water and feed if provided in the container.</u> LU (MS Comments): LU: ok				
-	A	B	C	D					
Average live weight [kg]	Pigs	Equidae	Bovine animals	Sheep and goats					
k=0,027	k=0,029	k=0,034	k=0,037						

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Presidency text					Drafting suggestions and MS Comments
25	0,23	-		0,32	
50	0,37	0,40	0,46	0,50	
75	0,48	0,52	0,60	0,66	
100	0,58	0,63	0,73	0,80	
125	0,68	0,73	0,85		
150	0,76	0,82	0,96		
175	0,84	0,91	1,06		
200	0,92	1,00	1,16		
225	1,00	1,08	1,26		
250	1,07	1,16	1,35		
275	1,14	1,23	1,44		
300	1,21	1,31	1,52		
325	1,28	1,38	1,61		
350	1,34	1,45	1,69		
375	1,40	1,52	1,77		
400	1,47	1,59	1,85		
450		1,71	2,00		
500		1,84	2,14		
550		1,96	2,28		
600		2,08	2,42		
650		2,19	2,55		
700		2,30	2,68		
750		2,41	2,81		
800		2,52	2,93		
850			3,05		
900			3,17		
950	-	-	3,29	-	

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Presidency text			Drafting suggestions and MS Comments																																	
1000		3,40																																		
3. Space allowance in area per animal [cm ²] for poultry and rabbits transported in containers shall comply at least with the figures below:																																				
<table border="1"> <thead> <tr> <th>-</th> <th>£</th> <th>£</th> </tr> <tr> <th>approximate live weight</th> <th>poultry k=290</th> <th>rabbits k=270</th> </tr> </thead> <tbody> <tr><td>1</td><td>290</td><td>270</td></tr> <tr><td>1,5</td><td>380</td><td>354</td></tr> <tr><td>2</td><td>460</td><td>429</td></tr> <tr><td>2,5</td><td>534</td><td>497</td></tr> <tr><td>3</td><td>603</td><td>562</td></tr> <tr><td>3,5</td><td>669</td><td>622</td></tr> <tr><td>4</td><td>731</td><td>680</td></tr> <tr><td>4,5</td><td>790</td><td>736</td></tr> <tr><td>5</td><td>848</td><td>789</td></tr> </tbody> </table>			-	£	£	approximate live weight	poultry k=290	rabbits k=270	1	290	270	1,5	380	354	2	460	429	2,5	534	497	3	603	562	3,5	669	622	4	731	680	4,5	790	736	5	848	789	
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Presidency text	Drafting suggestions and MS Comments
<p>4. — Equine animals other than unbroken horses and mares with their foals shall be transported in individual stalls.</p>	
<p>The length of the individual stall shall be at least 40 cm greater than the length of the equine animal measured from the tail to the nose while with the neck is parallel to the ground, and additional 50 cm greater if feed in a hay net is provided in transit.</p>	
<p>The width of the individual stall shall be in total at least 40 cm greater than the width of the animal at its widest point.</p>	

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Presidency text	Drafting suggestions and MS Comments
<p>Footnote 1</p> <p><u>A new point 5.2a will be added in Chapter III of Annex I: “Animals of the equine species other than unbroken horses and mares with their foals shall be transported in individual stalls.”</u></p>	<p>HR (Drafting suggestions):</p> <p><u>A new point 5.2a will be added in Chapter III of Annex I: “Animals of the equine species other than unbroken horses and mares with their foals shall be transported in individual stalls</u></p> <p>HR (MS Comments):</p> <p>HR does not support this addition</p> <p>PL (MS Comments):</p> <p>We do not think it is necessary to have individual stalls for horses, as it is enough if they are tied. Also, we agree with comments made by other delegations, i.e. the means of transported is approved when it is empty. We would prefer to see a value concerning the surface area per horse (expressed as k-value or as kg/m2 to ensure easier implementation and control).</p>