Council of the European Union
General Secretariat

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CONTRIBUTION

From:	Presidency
To:	Working Party on Animals and Veterinary Questions (Animal Welfare)
N° prev. doc.:	14768/25
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 - MS comments on Annex II (Transport of aquatic animals)

Delegations will find in Annex comments from the Member States (**AT, CZ, DE, E S, FI, FR, FR, GR, HR, HU, IT, LT, LV, NL, PL, PT, RO, SE**) on the Presidency text on Annex II (Transport of aquatic animals) (as in document 14768/25).

AW transport - Annex II
From: AT, CZ, DE, ES, FI, FR, FR, GR, HR, HU, IT, LT, LV, NL, PL, PT, RO, SE

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**). *Track changes can only be connected once the cursor is placed in editable areas (Drafting or Comments columns).

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted.**

New provisions may only be added in any of the **'existing cells'.**

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 on … .docx**

Thank you for your cooperation!

Pcy Text	Drafting suggestions and Comments
General Comments	AT (Comments): **Austria welcomes the inclusion of new provisions for aquatic animals, as aquatic animals are currently barely regulated, if at all, in Regulation (EC) No 1/2005.** ES (Comments): We welcome the development of a specific Annex for aquatic animals. But regarding the scope of the proposal of text, our position is that: • Ornamental fish should not be excluded from the scope. • Aaquatic invertebrates should not be included, at least until enough scientific evidence is available. Several provisions still require clarification and adaptation to aquaculture.

Pcy Text	Drafting suggestions and Comments
	We consider that: • A clear definition of wellboats is needed. • All specific requirements for aquatic animals (different than terrestrial animals) should be grouped exclusively in Annex II. • Many indicators included in the text (CO□, ammonia, densities, fasting) lack species-specific scientific standards. • Those indicators are not feasible to measure during transport. • Inspections during transport are often not possible due to sealed containers. • Killing during transport is not realistic nor safe and should only occur at destination. • It seems convinient to authorise containers (where fishes are located and confined) rather than the means of transport itself. Different types of containers are used for fishes and should be considered in order to provide an authorisation. The requirement of these means of transport/containers should be armonised. FI (Comments): FI suggests that to point 2 of article 4 a provision , similar to farmers of terrestial animals, is added that farmers of aquatic animals may transport their own aquatic animals using their own means of transport between their own holdings/establishments. In addition to point 3 of article 2 it shoud be

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Pcy Text	Drafting suggestions and Comments
	added that transports of fish for restocking in natural waters would not fall within the scope of the Regulation And also FI suggests that to point 4 of article 2 is complemented which provisions of the Regualtion apply to aquatic animals. GR (Comments): 1) The regulation should consider the biology and welfare requirements of each farmed fish species, which may be presented in a table within an annex. 2) Specific welfare needs vary across life-cycle and production phases—for example, for broodfish, eggs, larvae, and juveniles.. Whether the regulation will provide for these differences need to be discussed with the Member States. 3) A delegated act or regulation when more scientific data for this topic is available, since many issues cannot be regulated at this stage. 4) Furthermore, guidelines from EU Reference Center for Aquatic animals on animal transport are suggested to offer specific parameters and ways of performing official controls on fish welfare during transport. Furthermore, the inclusion of ornamental fish in ths scope of the Annex should be further discussed. 5) Well boats are not defined in the Regulation. If this Annex will apply to well boats as well, these need to be defined. 6) Cephalopods and invertebrates should not be included in the scope, since there is not enough scientific data. See comments above. 7) Killing methods for fish are not included in Regulation 1099/2009. They should be defined in a legal text, if not in this one. General comment regarding “means of transport”: documentation, testing and calibration is missing form the text. Our suggestion is to add the following:

Pcy Text	Drafting suggestions and Comments
	Biosecurity: Clean and disinfect vessels/trucks before each transport, including all pipes and pumps. Use only approved chemicals, following the correct concentrations and application times. Document all cleaning activities. **Calibration**: Calibrate all water quality sensors (oxygen, temperature, pH) before transport. Properly document all maintenance and calibration records. **Testing of life-support equipment**:Test oxygenation systems to ensure they are functional and operating correctly. If oxygen is supplied from cylinders, verify that there is sufficient supply for the entire transport. **Documentation**: Provide valid health certificates for the fish. Ensure that documentation specifying the number and size of the fish accompanies the transport. Furthermore, journey log for journeys over 24 hours which includes: a) planned route, expected duration and water exchange points, b) destination, unloading site c) 4 hour confirmation of inspection HU (Comments): Provided that we generally support the approach of this Annex, we believe that further fine-tuning is needed due to the diversity of these animals. IT (Comments): We would like to thank the Presidency to have decided to create a specific Chapter for the transport of aquatic animals, nevertheless these provisions would seem to be too much detailed for the purpose of this regulation LT (Comments):

Pcy Text	Drafting suggestions and Comments
	Transporting fish does not constitute a significant part of animal transportation in Lithuania. Lithuania relies on the opinions and proposals of countries with more experience in this field. Any requirements should be proportionate, feasible without imposing a heavy burden on the sector, while ensuring animal welfare. The requirements must be justified and such that competent authorities can guarantee the implementation and control of those provisions. However, when assessing the provisions proposed by the Presidency in Annex II of the draft, concerns arise regarding the requirements set out in point 3.2 on water parameter monitoring – installing such equipment could be very costly for carriers, depending on the method of transporting aquatic animals. Point 4 sets out requirements for the fitness of aquatic animals for transport. Such a separate section for aquatic animals somewhat undermines the unified structure of the legal act, since there is already a separate section on animal fitness for transport. Concerns also arise regarding point 6.5 – when transporting a large quantity in a container, e.g., fish, it will be difficult to identify a sick or injured animal that should be euthanized. Therefore, it is not appropriate to include a provision in the draft that would be impossible to implement. LV (Comments): The welfare requirements for farmed fish could be added as Annex. The specific requirenments “Fitness for transport” can be added as additional Articles or in Annex mentioned above. ~~In section “means of transport”: documentation, testing and calibration: Document all cleaning activities.~~ ~~**Calibration**: Calibrate all water quality sensors (oxygen, temperature, pH) before transport. Properly document all maintenance and calibration records.~~ ~~**Testing of life-support equipment**:Test oxygenation systems to ensure they are functional and operating correctly. If oxygen is supplied from cylinders, verify that there is sufficient supply for the entire transport.~~

Pcy Text	Drafting suggestions and Comments
	~~**Documentation**: Provide valid health certificates for the fish. Ensure that documentation specifying the number and size of the fish accompanies the transport. Furthermore, journey log for journeys over 24 hours which includes:~~ ~~a) planned route, expected duration and water exchange points,~~ ~~b) destination, unloading site~~ ~~c) 4 hour confirmation of inspection~~ NL (Comments): In general if there are no drafting suggestions and/or no comments, that means we agree with the presidency proposal as it is. Also we think that Annex II should be based on scientific knowledge as much as posible. But for many species of aquatic animals this scientific knowledge is not yet available. That is why we would like to have certain subjects of Annex II included in artikel 47 to empower the Commission to adopt delegated acts in accordance with article 48 in order to take into account technical progress and scientific developments when available, including scientific opinions of the EFSA, and social, economic and environmental impacts. RO (Comments): 1) The regulation should consider the biology and welfare requirements of each farmed fish species, which may be presented in a table within an annex. 2) Specific welfare needs vary across life-cycle and production phases—for example, for broodfish, eggs, larvae, and juveniles.. Whether the regulation will provide for these differences need to be discussed with the

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	Member States. 3) A delegated act or regulation when more scientific data for this topic is available, since many issues cannot be regulated at this stage. 4) Furthermore, guidelines from EU Reference Center for Aquatic animals on animal transport are suggested to offer specific parameters and ways of performing official controls on fish welfare during transport. Furthermore, the inclusion of ornamental fish in this scope of the Annex should be further discussed. 5) Well boats are not defined in the Regulation. If this Annex will apply to well boats as well, these need to be defined. 6) Cephalopods and invertebrates should not be included in the scope, since there is not enough scientific data. See comments above. 7) Killing methods for fish are not included in Regulation 1099/2009. They should be defined in a legal text, if not in this one. General comment regarding "means of transport": documentation, testing and calibration is missing form the text. Our suggestion is to add the following: **Biosecurity**: Clean and disinfect vessels/trucks before each transport, including all pipes and pumps. Use only approved chemicals, following the correct concentrations and application times. Document all cleaning activities. **Calibration**: Calibrate all water quality sensors (oxygen, temperature, pH) before transport. Properly document all maintenance and calibration records. **Testing of life-support equipment**: Test oxygenation systems to ensure they are functional and operating correctly. If oxygen is supplied from cylinders, verify that there is sufficient supply for the entire transport. **Documentation**: Provide valid health certificates for the fish. Ensure that documentation specifying the number and size of the fish accompanies the transport. Furthermore, journey log for journeys over 24 hours which includes: a) planned route, expected duration and water exchange points,

Pcy Text	Drafting suggestions and Comments
	b) destination, unloading site c) 4-hour confirmation of inspection SE (Comments): This annex should be reformulated in a way, that it takes into consideration what is already stated in other articles in the regulation. Which provisions apply to aquatic animals should be added to article 2 and similarly, the provisions applicable to air transport should be set out in the air transport chapter.
	FR (Comments): Définition du container dans ce cadre = tout contenant où sont transportés les animaux aquatiques (cuve, intérieur des navires viviers par exemple) Concernant les règles de biosécurité, les navires viviers font l'objet d'un agrément au titre de la LSA (en l'occurrence dans le règlement délégué (UE) 2020/691) FR (Comments): Definition of container in this context = any container where aquatic animals are transported (tank, tank of well boats for example) Regarding biosecurity rules, well boats are subject to an LSA approval (in this case in Delegated Regulation (EU) 2020/691)
ANNEX II	DE (Comments): In general, we note that the wording in this annex is very vague and undefined in many places. The requirements should be more specific where

Pcy Text	Drafting suggestions and Comments
	possible. Where this is not possible now, the Commission can make use of its empowerment to adopt delegated acts at a later time point.
SPECIFIC CONDITIONS FOR THE TRANSPORT OF AQUATIC ANIMALS	FI (Comments): This annex should be reformulated in a way, that it takes into consideration what is already stated in the articles. LV (Drafting suggestions): **SPECIFIC CONDITIONS FOR THE TRANSPORT OF ~~AQUATIC ANIMALS~~ FARMED FISH** PT (Drafting suggestions): Article 2 3. This Regulation shall not apply to the following types of transport ~~(e) the transport of ornamental fish;~~ PT (Comments): Regarding the transport of aquatic animals, its important to reinforce the need to include in the scope of the Regulation, the transport of ornamental fish. Ornamental fish is one of the most commonly transported animals and deserves a special protection, due to the challenges of this type of transport. We believe that all comercial transport of aquatic animals should be protected by the proposal, including the transport made in wellboats.

Pcy Text	Drafting suggestions and Comments
As referred to in Articles 2, 18, 33, 44 and 47	CZ (Comments): To have all relevant provisions in one place we suggest to have a separate chapter dealing with aquatic animals only. We propose that the transport of ornamental fish is also included. DE (Comments): The list of articles is partly outdated (e.g. references to Annex II are also made in Articles 12a, 17, 20, 20a and 36a). We suggest to adapt the list when the entire final text is ready for adoption.
1. **Design and maintenance of ~~means of transport~~ road vehicles and containters**	DE (Drafting suggestions): Undo DE (Comments): The change from means of transport to road vehicles is unclear to us, as well-boats are also mentioned (see point 1.3). We suggest to keep the term 'means of transport' for more flexibility. FI (Drafting suggestions): **Design and maintenance of means of transport ~~road vehicles~~ and containters** FI

Pcy Text	Drafting suggestions and Comments
	(Comments): Means of transport is better term here considering definitions in article 3. This same observation applies trughout the text. Means of transport also includes moving of fish using net bags. There it is important to adjust the velocity to the swimming velocity of fish to avoid their injuries and accumulation of fish against net. Unless this is the purpose of changing the term and transports in nets is intentionally excluded. FR (Drafting suggestions): 1. Design and maintenance of road vehicles, ~~and~~ containers **and their equipments** FR (Comments): Les équipements des conteneurs (cuves ou tout contenant y compris dans les navires viviers) sont importants (cf le point 1.3 plus avant) : il faut les mentionner dès le titre : le fait qu'ils soient adaptés (1.1) et en bon état (1.2) doit aussi les couvrir. FR (Drafting suggestions): 1. Design and maintenance of road vehicles, ~~and~~ containers **and their equipments** FR (Comments): The equipment of the containers (any tanks, included any container in well boats) is important (see point 1.3 below): they should be mentioned in the title: the fact that they are suitable (1.1) and in good condition (1.2) must also cover them.

Pcy Text	Drafting suggestions and Comments
	GR (Drafting suggestions): Design and maintenance of means of transport GR (Comments): Keep the original title so that it also covers well-boats and air transportation if this is finally decided. HU (Drafting suggestions): **1. Design and maintenance of means of transport ~~road vehicles and containters~~** HU (Comments): Other menans of transport shall be covered as well. IT (Drafting suggestions): **Design and maintenance of ~~road vehicles and~~ means of transport adapted for aquatic animals and containters** IT (Comments): We ask for a clarification on the definition of "containers" and if "fish tank" is included. We also would prefer the wording "means of transport adapted for aquatic animals" instead of road vehicles. LV (Drafting suggestions):

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Pcy Text	Drafting suggestions and Comments
	Design and maintenance of ~~means of transport~~ road ~~vehicle~~ transports and containters PL (Drafting suggestions): 1. Design and maintenance of means of transport ~~road vehicles~~ and containers PL (Comments): In the Commission proposal the wellboats were also covered by the regulation and we do not see the reason to exclude them, if containers and road vehicles are covered. Perhaps it is enough to mention "containers" without referencing any means of transport. This comment applies to the whole chapter. PT (Drafting suggestions): PT- 1. Design and **maintenance of means of transport** ~~road vehicles~~ and containters PT (Comments): We propose to include the fish transport by wellboat, which is a common practice. RO (Drafting suggestions): Design and maintenance of means of transport RO (Comments): Keep the original title so that it also covers well-boats and air transportation

Pcy Text	Drafting suggestions and Comments
	if this is finally decided. SE (Drafting suggestions): 1. **Design and maintenance of means of transport ~~road vehicles~~ and containters** SE (Comments): Means of transport is a better term here considering definitions in article 3. This same observation applies consistently in the text. What conditions apply to wellboats or to aquatic enclosures/nets that are pulled by a boat?
1.1 ~~Means of transport~~ **Road vehicles** and containers used for transport of aquatic animals shall be appropriate to the species, size, weight and number of animals to be transported.	DE (Drafting suggestions): Undo DE (Comments): Please refer to the title of point 1. FI (Comments): Where are the appropriateness defined? For official controls there has to be definite rules for the sake of legal protection of operators. This is already covered in article 4 point 2 h. FR (Drafting suggestions):

Pcy Text	Drafting suggestions and Comments
	1.1 Road vehicles, ~~and~~ containers **and their équipements** used for transport of aquatic animals shall be appropriate to the species, size, weight and number of animals to be transported. FR (Drafting suggestions): 1.1 Road vehicles, ~~and~~ containers **and their equipment** used for transport of aquatic animals shall be appropriate to the species, size, weight and number of animals to be transported. GR (Drafting suggestions): The road vehicles should be: 1) able to transport 5 to 8 containers/tanks with a water capacity of 1.5 to 2 cubic meters per container/tank, and 2) equipped with a pump for filling the containers/tanks with water. Every container/tank should be manufactured in a way that does not harm fish, have a window or equivalent system for monitoring fish and equipped with a system for: 1) enriching the water that contains with oxygen, and 2) measuring in real time the concentration of disolved oxygen and the active acidity [pH] in the water. In addition, each container/tank should have a valve near its bottoj that allows the: 1) removal of water when emptying, and 2) exit of the fish [though this valve] when delivered to the farm. GR (Comments): The containers/tanks as described are suitable for all fish species.

Pcy Text	Drafting suggestions and Comments
	The number of fish [density of fish population] to be transported is calculated according to the: 1) concentration of the disolved oxygen in the water needed for each fish species for breathing, 2) individual size/body weight of the fish. HU (Drafting suggestions): 1.1 Means of transport ~~**Road vehicles**~~ and containers used for transport of aquatic animals shall be appropriate to the species, size, weight and number of animals to be transported. HU (Comments): see above IT (Drafting suggestions): ~~**Road vehicles**~~ ~~and~~ **Means of transport adapted for aquatic animals** and containers shall be appropriate to the species, size, weight and number of animals to be transported. IT (Comments): It could be useful to better explain the definition of "containers" and if "fish tank" is included LV (Drafting suggestions):

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Pcy Text	Drafting suggestions and Comments
	Road ~~vehicles~~ transnport and containers **intended ~~for used~~** for transport of aquatic animals shall be appropriate to the species, size, weight and number of animals to be transported, and **~~The road vehicles should be:~~** **~~1) able to transport 5 to 8 containers/tanks with a water capacity of 1.5 to 2 cubic meters per container/tank, and~~** **~~2) equipped with a pump for filling the containers/tanks with water.~~** **~~Every container/tank should be~~ manufactured in a way that does not harm fish and state of animals and oxygen levels in water and temperature of water can be controlled.** **Fish can't be harmed while ~~,~~ emptying the fish transport.** **The temperature of water in which fish is transfered can't differ for more than 2 centigrades to assure careful acclimatization to prevent temperature and chemical shock. ~~have a window or equivalent system for monitoring fish and equipped with a system for:~~** ~~1) enriching the water that contains with oxygen, and~~ ~~2) measuring in real time the concentration of disolved oxygen and the active acidity [pH] in the water.~~ ~~In addition, each container/tank should have a valve near its bottoj that allows the:~~ ~~1) removal of water when emptying, and~~ ~~2) exit of the fish [though this valve] when delivered to the farm.~~ LV (Comments): ~~The containers/tanks as described are suitable for all fish species.~~ ~~The number of fish [density of fish population] to be transported is calculated according to the:~~ ~~1) concentration of the disolved oxygen in the water needed for each fish species for breathing,~~

Pcy Text	Drafting suggestions and Comments
	~~2) individual size/body weight of the fish.~~ PL (Comments): The eyed egges, embrions and fish larvae shall be excluded from the regulation PT (Drafting suggestions): 1.1 Means of transport **~~Road vehicles~~** and containers used for transport of aquatic animals shall be appropriate to the species, size, weight and number of animals to be transported. PT (Comments): See comments above RO (Drafting suggestions): The road vehicles should be: 1) able to transport containers/tanks with a water capacity of 1.5 to 2 cubic meters per container/tank, and 2) equipped with a pump for filling the containers/tanks with water. Every container/tank should be manufactured in a way that does not harm fish, have a window or equivalent system for monitoring fish and equipped with a system for: 1) enriching the water that contains with oxygen, and 2) measuring in real time the concentration of disolved oxygen and the active acidity [pH] in the water.

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	In addition, each container/tank should have a valve near its bottoj that allows the: 1) removal of water when emptying, and 2) exit of the fish [though this valve] when delivered to the farm. RO (Comments): The containers/tanks as described are suitable for all fish species. The number of fishes [density of fish population] to be transported is calculated according to the: 1) concentration of the dissolved oxygen in the water needed for each fish species for breathing, 2) individual size/body weight of the fish. SE (Drafting suggestions): 1.1 **Means of transport** ~~**Road vehicles**~~ and containers used for transport of aquatic animals shall be appropriate to the species, size, weight and number of animals to be transported. SE (Comments): This is already covered in article 4 point 2 h.
1.2 ~~Means of transport~~ **Road vehicles** and containers shall be maintained in good mechanical and structural condition to prevent damages of the vehicle that may directly or indirectly affect the welfare of transported aquatic animals.	DE (Drafting suggestions): Undo DE (Comments):

Pcy Text	Drafting suggestions and Comments
	Please refer to the title of point 1 FI (Comments): This is already mostly covered in article 4 point c. FR (Drafting suggestions): 1.2 Road vehicles, ~~and~~ containers **and their équipements** shall be maintained in good mechanical and structural condition to prevent damages ~~of the vehicle~~ that may directly or indirectly affect the welfare of transported aquatic animals. FR (Drafting suggestions): 1.2 Road vehicles, ~~and~~ containers **and their equipment** shall be maintained in good mechanical and structural condition to prevent damages ~~of the vehicle~~ that may directly or indirectly affect the welfare of aquatic animals. GR (Drafting suggestions): Means of transport shall be maintained in good mechanical and structural condition to prevent damages of the vehicle or the container that may directly or indirectly affect the welfare of transported aquatic animals. GR (Comments): In addition to the good mechanical and structural condition, vehicles and containers/tanks before the next fish transport should be disinfected for biosecurity reasons [to prevent the occurrence of disease spread due to the transport of a fish population from another fish hatchery or fish farm]. See initial general comment as well.

Pcy Text	Drafting suggestions and Comments
	HU (Drafting suggestions): 1.2 Means of transport ~~**Road vehicles**~~ and containers shall be maintained in good mechanical and structural condition to prevent damages of the vehicle that may directly or indirectly affect the welfare of transported aquatic animals. HU (Comments): see above IT (Drafting suggestions): ~~**Road vehicles**~~ ~~and~~ **Means of transport adapted for aquatic animals** and containers shall be maintained in good mechanical and structural condition to prevent damages of the vehicle that may directly or indirectly affect the welfare of transported aquatic animals. IT (Comments): To be referred to the comment above LV (Drafting suggestions): 1.2 ~~Means of transport~~ **Road ~~vehicles~~ transport** and containers shall be maintained in good mechanical and structural condition to prevent damages of the vehicle that may directly or indirectly affect the welfare of transported aquatic animals.~~Means of transport shall be maintained in good mechanical and structural condition to prevent damages of the vehicle or the container that may directly or indirectly affect the welfare of transported aquatic animals.~~ LV

Pcy Text	Drafting suggestions and Comments
	(Comments): ~~In addition to the good mechanical and structural condition, vehicles and containers/tanks before the next fish transport should be disinfected for biosecurity reasons [to prevent the occurrence of disease spread due to the transport of a fish population from another fish hatchery or fish farm]. See initial general comment as well.~~ NL (Drafting suggestions): 1.2 Road vehicles and containers shall be maintained in good mechanical and structural condition to prevent damages of the vehicle **or the container** that may directly or indirectly affect the welfare of transported aquatic animals. NL (Comments): Damages to containers should also be prevented. PT (Drafting suggestions): **PT 1.2 Means of transport, containers and their fittings shall be designed, constructed, maintained and operated so as to:** **(a) avoid injury and suffering and to ensure the safety of the animals;** **(b) protect the animals from inclement weather, extreme temperatures and adverse changes in climatic conditions;** **(c) be cleaned and disinfected;** **(d) prevent the animals escaping or falling out and be able to withstand the stresses of movements;** **(e) ensure that water quality and quantity appropriate to the species transported can be maintained;** **(f) provide access to the animals to allow them to be inspected and cared for;**

Pcy Text	Drafting suggestions and Comments
	(i) provide a means of lighting sufficient for inspection and care of the animals during transport PT (Comments): We believe that the principle set out in Regulation 1/2005 regarding containers and means of transport, referred to in point 1.1 of Chapter II of Annex I, should be maintained. RO (Drafting suggestions): Means of transport shall be maintained in good mechanical and structural condition to prevent damages of the vehicle or the container that may directly or indirectly affect the welfare of transported aquatic animals. RO (Comments): In addition to the good mechanical and structural condition, vehicles and containers/tanks before the next fish transport should be disinfected for biosecurity reasons [to prevent the occurrence of disease spread due to the transport of a fish population from another fish hatchery or fish farm]. See initial general comment as well. SE (Drafting suggestions): 1.2 **Means of transport** ~~**Road vehicles**~~ and containers shall be maintained in good mechanical and structural condition to prevent damages of the vehicle that may directly or indirectly affect the welfare of transported aquatic animals. SE (Comments):

Pcy Text	Drafting suggestions and Comments
	This is already mostly covered in article 4 point c. In some way it should be specified that I stressfull noise and vibrations should also be minimised during transport.
	DE (Drafting suggestions): **<u>1.2a Means of transport and containers shall be designed and operated to be easily cleaned and desinfected, prevent the animals from jumping out and minimise leakage of water.</u>** **<u>1.2b Means of transport and containers shall be designed and maintained to minimise noise and vibrations that may negatively affect the welfare of transported aquatic animals.</u>** DE (Comments): We suggest to list biosecurity measures as they indirectly contribute to animal welfare by minimising the risk of disease spreading as well as further provisions that are also relevant to welfare of aquatic animals.
1.3 ~~Means of transport~~ **<u>Road vehicles</u>** and containers shall ensure adequate circulation of water and equipment for oxygenation as required to meet variations in the conditions during the journey and the needs of the animals being transported, including the closing of valves in well boats for biosecurity reasons.	CZ (Comments): During transport, it is impossible to ensure water circulation between individual transport tanks (or within a single tank), nor is there any reason to do so. Safe transport of fish is ensured by aeration or the application of gaseous oxygen (oxygenation), or by cooling the water. If circumstances require, only partial water replacement takes place, and only if this replacement is feasible (also for reasons of biosecurity). DE (Comments): Please refer to the title of point 1

Pcy Text	Drafting suggestions and Comments
	ES (Comments): It is not necessary to refer to the need for water circulation during transport. Water movement inside fish transport tanks is the result of oxygenation and the natural displacement of the water column through oxygen bubbles. There are no additional devices specifically dedicated to water circulation; therefore, mentioning it in addition to oxygenation is not justified. The injection of oxygen during transport may also cause abrupt changes in concentration that can be harmful to fish. FI (Comments): well boats are not road vehicles, are they considered being containers? The term means of transport would better describe these all. FR (Drafting suggestions): 1.3 Road vehicles, ~~and~~ containers **and their équipements** shall ensure adequate circulation of water and ~~equipment for~~ oxygenation as required to meet variations in the conditions during the journey and the needs of the animals being transported~~**, including the closing of valves in well boats for biosecurity reasons.**~~ FR (Comments): Il ne peut plus être fait référence aux bateaux-viviers dans un paragrahe qui ne concerne plus que les véhicules routiers et les conteneurs Concernant les règles de biosécurité, les navires viviers font l'objet d'un agrément au titre de la LSA (en l'occurrence dans le règlement délégué (UE) 2020/691)

Pcy Text	Drafting suggestions and Comments
	FR (Drafting suggestions): 1.3 Road vehicles, ~~and~~ containers **and their equipment** shall ensure adequate circulation of water and ~~equipment for~~ oxygenation as required to meet variations in the conditions during the journey and the needs of the animals being treated~~**, including the closing of valves in well boats for biosecurity reasons.**~~ FR (Comments): It is no longer possible to refer to well boats in a paragrahe which only concerns road vehicles and containers. Regarding biosecurity rules, well boats are subject to an LSA approval (in this case in Delegated Regulation (EU) 2020/691) GR (Drafting suggestions): Means of transport shall ensure adequate provision of oxygenation systems capable of meeting variations in conditions during the journey and the welfare needs of the fish, including situations in which valves on well-boats are closed for biosecurity reasons. GR (Comments): During transport, it is not possible to ensure water circulation between individual crates (or within a single crate), nor is there any reason to do so. Safe transport of fish is ensured by aeration or the application of gaseous oxygen (oxygenation), or by cooling the water. If circumstances require, only partial water replacement takes place, and only if this replacement is feasible (also for reasons of biosecurity). HU

Pcy Text	Drafting suggestions and Comments
	(Drafting suggestions): 1.3 Means of transport **~~Road vehicles~~** and containers shall ensure adequate circulation of water and equipment for oxygenation as required to meet variations in the conditions during the journey and the needs of the animals being transported, including the closing of valves in well boats for biosecurity reasons. HU (Comments): see above IT (Drafting suggestions): **~~Road vehicles~~** ~~and~~ **Means of transport adapted for aquatic animals** and containers shall ensure adequate circulation of water **and a monitoring system** ~~equipment for oxygenation~~ **of all the water parameters specific for the different species and categories of aquaculture fishes** ~~as required to meet variations in the conditions during the journey and the needs of the animals being transported~~. **Closing of valves in well boats must be ensured for biosecurity reasons**. IT (Comments): In aquaculture and during transport of aquatic species the main parameters to be monitored are temperature, ph, ammonia levels, so we suggest to take into account all the relevant parameters and not only the oxygenation LV (Drafting suggestions): ~~Means of transport shall ensure adequate provision of oxygenation systems capable of meeting variations in conditions during the journey and the~~

Pcy Text	Drafting suggestions and Comments
	~~welfare needs of the fish, including situations in which valves on well-boats are closed for biosecurity reasons.~~ LV (Comments): ~~During transport, it is not possible to ensure water circulation between individual crates (or within a single crate), nor is there any reason to do so. Safe transport of fish is ensured by aeration or the application of gaseous oxygen (oxygenation), or by cooling the water. If circumstances require, only partial water replacement takes place, and only if this replacement is feasible (also for reasons of biosecurity).~~ NL (Drafting suggestions): 1.3 Road vehicles and containers shall ensure adequate circulation of water and equipment for oxygenation as required to meet variations in the conditions during the journey and the needs of the animals being transported, ~~including the closing of valves in well boats for biosecurity reasons~~. NL (Comments): Since means of transport is deleted and replaced by road vehicles, the inclusion of well boats in this way is incorrect. Apart from that we would like to prohibit the use of well boats, because of concerns for animal welfare and animal health. If it is not possible to prohibit the use of wellboats, we would like to suggest to include a separate paragraph on wellboats in this annex, clearly desecribing the measures and stipulations for protect the animals that are transported by well boats. This should not only cover biosecurity (which is not an animal welfare concern as much as it is a concern for public health

Pcy Text	Drafting suggestions and Comments
	and economics), but contain clear stipulations about animal welfare as well (how should such boats be constructed and used to be able to protect the animals transported in it adequately). PL (Drafting suggestions): 1.3 ~~Means of transport~~ ~~Road vehicles~~ ~~and~~ containers shall ensure ~~adequate circulation of water and~~ equipment for oxygenation as required to meet variations in the conditions during the journey and the needs of the animals being transported, including the closing of valves in well boats for biosecurity reasons. PL (Comments): There's no need to refer to water circulation during transport. Water circulation within the fish transport tank is the result of oxygenation and the movement of the water mass within the tank by oxygen bubbles. There are no additional devices specifically for circulation, so mentioning it in addition to oxygenation is not justified. Also, consideration is needed wheter the mentioning of means of transport or of road vehicles in addition to containers is necessary. Fish are transported in containers, but what about aquatic animals transported without water, would the same requirements refer to transport of aquatic animals without water? The same comment to the road vehicle/means of transport/container applies to the whole chapter. PT (Drafting suggestions): PT- 1.3 Means of transport ~~**Road vehicles**~~ and containers shall ensure adequate circulation of water and equipment for oxygenation as required to meet variations in the conditions during the journey and the needs of the

Pcy Text	Drafting suggestions and Comments
	animals being transported, including the closing of valves in well boats for biosecurity reasons RO (Drafting suggestions): Means of transport shall ensure adequate provision of oxygenation systems capable of meeting variations in conditions during the journey and the welfare needs of the fish, including situations in which valves on well-boats are closed for biosecurity reasons. RO (Comments): During transport, it is not possible to ensure water circulation between individual crates (or within a single crate), nor is there any reason to do so. Safe transport of fish is ensured by aeration or the application of gaseous oxygen (oxygenation), or by cooling the water. If circumstances require, only partial water replacement takes place, and only if this replacement is feasible (also for reasons of biosecurity). SE (Drafting suggestions): 1.3 **Means of transport** ~~**Road vehicles**~~ and containers shall ensure adequate circulation of water**.** ~~**and**~~ **E**equipment for oxygenation ~~**is as**~~ required to meet variations in the conditions during the journey and the needs of the animals being transported, including the closing of valves in well boats for biosecurity reasons. **There should be a possibility to adjust the temperature and pressure in the compartment.** SE (Comments): Well boats are not road vehicles, are they considered being containers? The term means of transport would better describe these all. Temperature and pressure are important parameters for transport of aquatic animals.

Pcy Text	Drafting suggestions and Comments
1.4 The aquatic animals shall be accessible to inspection during the journey in order to ensure that their welfare can be assessed.	ES (Comments): It does not seem feasible to apply this requirement to all types of containers and means of transport. In practice, fish are not always visible during the journey. Containers must remain sealed, and even small openings or modifications may compromise water quality and animal welfare. HU (Comments): Since those container are usually closed during transport we would be corious about the practical implementetion PT (Drafting suggestions): PT- 1.4 The aquatic animals shall be accessible **as much as possible** to inspection during the journey in order to ensure that their welfare can be assessed. PT (Comments): We agree that when transporting ornamental fish, it can be difficult to access the animals throughout the journey. SE (Drafting suggestions): ~~1.4 The aquatic animals shall be accessible to inspection during the journey in order to ensure that their welfare can be assessed.~~ SE (Comments): Does not add anything other than what is in 1.5 and 3.2.

Pcy Text	Drafting suggestions and Comments
1.5 ~~Means of transport~~ **Road vehicles** and containers shall allow for inspection and monitoring of the relevant parameters and take corrective measures when necessary.	FI (Comments): What are these relevant parameters and have they been given limit values somewhere? At least it should be listed which values should be monitored even if no limit values could be set for different species and age groups. HU (Drafting suggestions): 1.5 Means of transport ~~**Road vehicles**~~ and containers shall allow for inspection and monitoring of the relevant parameters and take corrective measures when necessary. HU (Comments): see above LV (Drafting suggestions): ~~Means of transport~~ **Road ~~vehicles~~ transport** and containers shall allow for inspection and monitoring of the relevant parameters and take corrective measures when necessary. NL (Drafting suggestions): 1.5 Road vehicles and containers shall allow for inspection and monitoring of the relevant parameters and ~~take~~ **for taking** corrective measures when necessary. NL (Comments):

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Pcy Text	Drafting suggestions and Comments
	Grammatical correction. PL (Drafting suggestions): 1.5 ~~Means of transport Road vehicles and~~ containers shall allow for inspection and monitoring of the relevant parameters and take corrective measures when necessary. PL (Comments): Transport vehicles are not equipped with a system for continuous monitoring of water parameters in the pools. In case of transport of several or a dozen pools, such a system is extremely expensive. Drivers have portable devices that are used to check temperature and oxygen levels in the pools during inspection stops during transport. PT (Drafting suggestions): PT- 1.5 Means of transport **~~Road vehicles~~** ~~and~~ containers shall allow as much as possible, for inspection and monitoring of the relevant parameters and take corrective measures when necessary. PT (Comments): See previous comment. SE (Drafting suggestions): 1.5 **Means of transport** **~~Road vehicles~~** and containers shall allow for inspection and monitoring of the relevant parameters and take corrective measures when necessary. SE

Pcy Text	Drafting suggestions and Comments
	(Comments): Weird sentence, the means of transport or the containers can not allow for inspection or take corrective measures.
2. Handling	DE (Comments): We suggest to switch the order of the points 2.1 and 2.2. The focus should first be on the use of suitable equipment and then on problematic handling.
2.1 Aquatic animals shall not be lifted by their gills.	DE (Drafting suggestions): ~~2.1~~ **2.2** Aquatic animals shall not be lifted by their gills. DE (Comments): Please refer to our comment in the heading for the reason why we suggest a change in numbering. SE (Drafting suggestions): 2.1 Aquatic animals shall **be handled gently and** not be lifted by their **gills or any appendages**. SE (Comments): Aquatic animals should not be lifted by bodypbe lifted supported by a hand under the body for example.
	AT (Drafting suggestions):

Pcy Text	Drafting suggestions and Comments
	Aquatic animals shall not be lifted by their gills, **side and dorsal fins.** SE (Drafting suggestions): **2.1 a) Exposure to air should be minimised during handling.**
2.2 The handling equipment shall be designed, constructed, and maintained to minimise physical injuries.	DE (Drafting suggestions): ~~2.2~~ **2.1** The handling equipment shall be designed, constructed, and maintained to ~~minimise~~ **avoid** physical injuries. DE (Comments): The equipment itself should be designed to avoid injuries of the animal. Injury-proof equipment is a prerequisite for injury-proof handling during loading and unloading (see points 5.1 and 7.2 below). FI (Drafting suggestions): The handling equipment shall be designed, constructed, ~~and~~ maintained **and used** to **avoid** ~~minimise~~ physical injuries. FI (Comments): for example, excessive flow in transmission pipes may damage the fish. FR (Drafting suggestions): 2.2 The handling equipment shall be designed, constructed, **used** and maintained to minimise physical injuries. FR (Drafting suggestions):

Pcy Text	Drafting suggestions and Comments
	2.2 The handling equipment shall be designed, designed, **used** and maintained to minimise physical injuries. GR (Drafting suggestions): Handling equipment shall be designed, constructed, and maintained to minimise physical injuries. GR (Comments): Fish should be pre-anesthetized (not fully anesthetised) prior to handling to facilitate handling while minimizing any physical injury from handling equipment. Therefore, water in the containers/tanks where fish are firstly transported must already be enriched with oxygen to enable rapid recovery from anesthesia. LV (Drafting suggestions): ~~Handling equipment shall be designed, constructed, and maintained to minimise physical injuries.~~ LV (Comments): ~~Fish should be pre-anesthetized (not fully anesthetised) prior to handling to facilitate handling while minimizing any physical injury from handling equipment.~~ ~~Therefore, water in the containers/tanks where fish are firstly transported must already be enriched with oxygen to enable rapid recovery from anesthesia.~~ RO (Drafting suggestions):

Pcy Text	Drafting suggestions and Comments
	Handling equipment shall be designed, constructed, and maintained to minimise physical injuries. RO (Comments): Fish should be pre-anesthetized (not fully anesthetised) prior to handling to facilitate handling while minimizing any physical injury from handling equipment. Therefore, water in the containers/tanks where fish are firstly transported must already be enriched with oxygen to enable rapid recovery from anesthesia. SE (Drafting suggestions): The handling equipment shall be **appropriate for the species, life stage, size of aquatic animals and** designed, constructed, and maintained to **avoid** ~~minimise~~ physical injuries **and unnessecary stress**. SE (Comments): Also negative phycological conditions such as unnessecary stress should be avoided.
	DE (Drafting suggestions): **2.3 Decapods shall not be lifted by their legs.** DE (Comments): Lifting by the legs can lead to loss of legs in decapods.
3. Water	IT (Comments):

Pcy Text	Drafting suggestions and Comments
	In aquaculture and during transport of aquatic species the main parameters to be monitored are oxygen, temperature and ph, followed by ammonia levels NL (Comments): Maybe there should also be a definition for operator.
3.1 Operators shall ensure water quality that is appropriate for the species being transported and method of transportation.	CZ (Drafting suggestions): 3.1 Operators shall ensure water quality **and quantity** that is appropriate for the species **and size categories** being transported and method of transportation. CZ (Comments): Welfare requirements through transport are diverse regarding different fish size categories. ES (Comments): Water quality is a critical factor in the transport of fish; however, there are no species-specific standards available to define precise limits or thresholds. This makes the practical application and enforcement of this requirement difficult until such standards are established. FI (Drafting suggestions): [3.1 Operators shall ensure water quality that is appropriate for the species being transported and method of transportation.] FI (Comments):

Pcy Text	Drafting suggestions and Comments
	Where is appropriateness defined? Clear definition is necessary for official controls. Or delete this, because this is already covered in article 4 point j. GR (Drafting suggestions): Operators shall ensure water quality and quantity that is appropriate for the species and categories being transported and method of transportation GR (Comments): 1) Water used in the transport system shall be of the same ambient conditions as water from which the fish are sourced, or alternatively fish shall be properly acclimatized before the journey begins. However, it is suggested to lower the water temperature in the transport tanks, by 3-4°C for trips longer than 24h, to reduce fish metabolism. This increases their resilience and ability to withstand longer journeys. 2) Fry have many times higher demands than adult fish. 3) Opetators could change 2/3 of the water in the containers/tanks during tranfortation by pumping [see paragraph 1.1] clean water from a nearby sea a river/lake or any equivalent depending on the fish species. This is absolutely necessary after 5 hours from the start of the transportation, as the water has been contaminated by carbon dioxide due to fish's respiration and must be removed from the container/tank's water. HR (Drafting suggestions):

Pcy Text	Drafting suggestions and Comments
	Operators shall ensure water quality that is appropriate for the species being transported and method of transportation **during the whole journey**. HR (Comments): For the purpose of this annex operator should be cleraly defined. Currently there is no definition of operator in article 3. IT (Drafting suggestions): Operators shall ensure water quality that is appropriate for the species **and categories** being transported and method of transportation. LV (Drafting suggestions): ~~Operators shall ensure water quality and quantity that is appropriate for the species and categories being transported and method of transportation~~ LV (Comments): ~~4) Water used in the transport system shall be of the same ambient conditions as water from which the fish are sourced, or alternatively fish shall be properly acclimatized before the journey begins. However, it is suggested to lower the water temperature in the transport tanks, by 3-4°C for trips longer than 24h, to reduce fish metabolism. This increases their resilience and ability to withstand longer journeys.~~ ~~5) Fry have many times higher demands than adult fish.~~ ~~6) Opetators could change 2/3 of the water in the containers/tanks during tranfortation by pumping [see paragraph 1.1] clean water from~~

Pcy Text	Drafting suggestions and Comments
	~~a nearby sea a river/lake or any equivalent depending on the fish species.~~ ~~This is absolutely necessary after 5 hours from the start of the transportation, as the water has been contaminated by carbon dioxide due to fish's respiration and must be removed from the container/tank's water.~~ PT (Drafting suggestions): 3.1 **Operators must establish specific procedures for each species to be transported, setting out acceptable parameters for transport, in particular water quality, and the measures to be taken in the event of a deviation.** PT (Comments): We believe that each carrier should have procedures in place that define water quality parameters and outline the measures to be taken in case of need. RO (Drafting suggestions): Operators shall ensure water quality and quantity that is appropriate for the species and categories being transported and method of transportation RO (Comments): 1) Water used in the transport system shall be of the same ambient conditions as water from which the fish are sourced, or alternatively fish shall be properly acclimatized before the journey begins. However, it is suggested to lower the water temperature in the transport tanks, by 3-4°C for trips longer than 24h, to reduce fish metabolism. This increases their resilience and ability to withstand

Pcy Text	Drafting suggestions and Comments
	longer journeys. 2) Fry have many times higher demands than adult fish. 3) Operators could change 2/3 of the water in the containers/tanks during tranfortation by pumping [see paragraph 1.1] clean water from a nearby sea a river/lake or any equivalent depending on the fish species. This is absolutely necessary after 5 hours from the start of the transportation, as the water has been contaminated by carbon dioxide due to fish's respiration and must be removed from the container/tank's water. SE (Comments): Already covered in article 4 point j.
3.2 Operators shall ensure the monitoring and maintenance of the following water parameters within the limits according to the species-specific needs during the whole journey:	AT (Comments): Continuous monitoring of the water parameters would be welcome; however, it must also be taken into account that this regulation does not disadvantage small operators. CZ (Drafting suggestions): 3.2 Operators shall ensure the **~~monitoring~~ control** and maintenance of the following water parameters within the limits according to the species-specific needs during the whole journey: CZ

Pcy Text	Drafting suggestions and Comments
	(Comments): It is unclear how the parameters should be monitored. That wouldn't make sense especially if ornamental fish fry were also included, which are transported in bags in polystyrene boxes with an O2 atmosphere and arrive at their destination without any problems. Vehicles are not equipped with a system for continuous monitoring and recording of water parameters in the pools. With multiple-pool units, such a system would be extremely expensive. Drivers have portable devices that are used to check the temperature and oxygen levels in the pools during a control stop during transport. In addition, each pool water oxygenation system is equipped with an oxygen gauge reading the level of oxygen coming to the fish pools. It is completely sufficient to ensure safe conditions for transporting fish and meet the objectives of the regulation. On average, water quality deteriorates significantly not earlier than after approximately 12 hours of transport. As no clear parameters are envisaged, it is unclear what is and is not permissible. Transporters will therefore have to equip their vehicles with devices, which will need to be calibrated, and keep records of control measurements during transport will have to be kept. For inspection purposes, it will be necessary to equip veterinary inspectors with devices. We propose that the species specific parameters could be set in delegated act. DE (Drafting suggestions): 3.2 Operators shall ensure the ~~monitoring and~~ maintenance of **at least** the following water parameters within the limits according to the species-specific needs during the whole journey:

Pcy Text	Drafting suggestions and Comments
	DE (Comments): We suggest to delete the aspect of monitoring water parameters here, as this may not be necessary in all cases, e.g. for very short journeys or when fish density is very low. We suggest to add a new point 3.3 to improve readability concerning the aspect of 'monitoring'. In some cases, additional parameters (such as pH or salinity) may be necessary. Therefore the list should not be exhaustive. ES (Comments): Transport vehicles are not equipped with continuous monitoring systems for water parameters in the tanks. For vehicles carrying multiple tanks, such systems would be extremely costly and technically unfeasible. In practice, drivers use portable devices to check temperature and oxygen levels during scheduled stops, and each tank's oxygenation system includes a gauge indicating the level of oxygen supplied. This is sufficient to ensure safe conditions for fish during transport. At present, there are no operational or affordable systems that allow continuous measurement of additional parameters during the journey, and their routine monitoring is therefore not feasible. FI (Comments): Does the requirement of monitoring during the whole journey mean continuous measurement or would regular manual measurements be sufficient? If the measurement is not continuous, should there be obligations for book keeping, otherwise the supervision can not be implemented. This can also be part of self-monitoring, but still requires more clear rules.

Pcy Text	Drafting suggestions and Comments
	Where species specific needs are stated? For official controls, the treshold values should be stated. FR (Comments): Dans le projet de règlement, il n'est question que du transport d'animaux aquatiques dans l'eau. Or, ce n'est pas toujours le cas. Par exemple, les civelles (jeunes anguilles) voyagent mieux en atmosphère humide que dans l'eau. Idem pour la sole sénégalaise (qu'on élève en France). Et dans ce cas, il est impossible d'exercer une surveillance des paramètres physico-chimiques de l'eau. FR (Comments): The draft regulation deals only with the transport of aquatic animals in water. However, this is not always the case. For example, glass eels (young eels) travel better in a humid atmosphere than in water. The same goes for Senegalese sole (which is raised in France). And in this case, it is impossible to monitor the physico-chemical parameters of the water. GR (Drafting suggestions): Operators ensure the control and maintenance of the following water parameters within the limits according to the species-specific needs during the whole journey. GR (Comments): 1) The term "monitoring" is not clearly defined in these provisions of the regulation and Annex II. There should be a clear provision that it is necessary to control temperature and oxygen parameters during transportation.

Pcy Text	Drafting suggestions and Comments
	2) We suggest guidelines from the EURCAW- Aqua as to whether these parameters can really be monitored, appropriate values for each fish farmed species and the way (equipment and methodology) official veterinarians can supervise them. 3) Transporters will therefore have to equip their vehicles with devices, which will need to be calibrated, and keep records of control measurements during transport. For inspection purposes, it will be necessary to equip veterinary inspectors with devices. On average, water quality deteriorates significantly after approximately some hours of travel. HR (Drafting suggestions): ~~3.2 Operators shall ensure the monitoring and maintenance of the following water parameters within the limits according to the species-specific needs during the whole journey~~: LT (Comments): Installing such equipment could be very costly for carriers, depending on the method of transporting aquatic animals. LV (Drafting suggestions): ~~**Operators**~~ **Transporters** shall ensure **calibrated equipment ~~theo~~** monitoring and maintenance of the following water parameters within the limits according to the species-specific needs during the whole journey ~~Operators ensure the control and maintenance of the following water parameters within the limits according to the species-specific needs during the whole journey.~~ LV (Comments):

Pcy Text	Drafting suggestions and Comments
	~~1) The term "monitoring" is not clearly defined in these provisions of the regulation and Annex II. There should be a clear provision that it is necessary to control temperature and oxygen parameters during transportation.~~ ~~2) We suggest guidelines from the EURCAW- Aqua as to whether these parameters can really be monitored, appropriate values for each fish farmed species and the way (equipment and methodology) official veterinarians can supervise them.~~ ~~3) Transporters will therefore have to equip their vehicles with devices, which will need to be calibrated, and keep records of control measurements during transport. For inspection purposes, it will be necessary to equip veterinary inspectors with devices.~~ ~~On average, water quality deteriorates significantly after approximately some hours of travel.~~ NL (Drafting suggestions): 3.2 Operators shall ensure the monitoring and maintenance of the following water parameters within the limits according to the species-specific needs **as determined by scientific data** during the whole journey: NL (Comments): The species-specific parameters should be determined on basis of scientific data. Since this scientific data is - for many species - unavailable at the moment, this should be incluced in article 47 as one of the subjects that the Commission is empowered to adopt delegated acts in accordance with article 48 in order to take into account technical progress and scientific developments when available, including scientific opinions of the EFSA, and social, economic and environmental impacts. PL

Pcy Text	Drafting suggestions and Comments
	(Drafting suggestions): 3.2 Operators shall ensure the **<u>control</u>** ~~monitoring~~ and maintenance of the following water parameters within the limits according to the species-specific needs during the whole journey: PL (Comments): The term "monitoring" is not clearly defined in these regulations and Annex II. A clear provision should be introduced that temperature and oxygen parameters must be controlled during transport. Transport vehicles are not equipped with a system for continuous monitoring of water parameters in the pools. In case of transport of several or a dozen pools, such a system is extremely expensive. Drivers have portable devices that are used to check temperature and oxygen levels in the pools during inspection stops during transport. Additionally, each pool water oxygenation system is equipped with a reading of the oxygen level supplied to the fish pools. This is completely sufficient to ensure safe conditions for fish transport. PT (Comments): We propose including pH instead of CO2 level. RO (Drafting suggestions): Operators ensure the control and maintenance of the following water parameters within the limits according to the species-specific needs during the whole journey. RO (Comments): 1) The term "monitoring" is not clearly defined in these provisions of the

Pcy Text	Drafting suggestions and Comments
	regulation and Annex II. There should be a clear provision that it is necessary to control temperature and oxygen parameters during transportation. 2) We suggest guidelines from the EURCAW- Aqua as to whether these parameters can really be monitored, appropriate values for each fish farmed species and the way (equipment and methodology) official veterinarians can supervise them. 3) Transporters will therefore have to equip their vehicles with devices, which will need to be calibrated, and keep records of control measurements during transport. For inspection purposes, it will be necessary to equip veterinary inspectors with devices. On average, water quality deteriorates significantly after approximately some hours of travel. SE (Comments): Does the requirement of monitoring during the whole journey mean continuous measurement or would manual monitoring at certain intervals be sufficient? What are the species specific needs? For official controls, the treshold values should be stated.
	IT (Comments): We suggest to redefine the order of relevant parameters as normally used in aquaculture, as follows: Oxygen, Temperature, Ph, Ammonia levels
(a) Oxygen;	AT (Drafting suggestions): Oxygen **saturation (%)** GR

Pcy Text	Drafting suggestions and Comments
	(Drafting suggestions): Keep Oxygen concentration on 6-8 mg L^{-1} or > 80% O_2 saturation during the journey. GR (Comments): Oxygen is the most critical water quality parameter. Both hypoxia (low oxygen) and hyperoxia (too much oxygen) can compromise fish welfare. Maintain oxygen saturation close to 100%, although levels between 80–120% may be tolerated for short periods. HR (Drafting suggestions): ~~(a) Oxygen;~~ LV (Drafting suggestions): ~~Keep Oxygen concentration on 6-8 mg L^{-1} or > 80% O_2 saturation during the journey.~~ LV (Comments): ~~Oxygen is the most critical water quality parameter. Both hypoxia (low oxygen) and hyperoxia (too much oxygen) can compromise fish welfare. Maintain oxygen saturation close to 100%, although levels between 80–120% may be tolerated for short periods.~~ RO (Drafting suggestions): Keep Oxygen concentration on 6-8 mg L^{-1} or > 80% O_2 saturation during the journey. RO

Pcy Text	Drafting suggestions and Comments
	(Comments): Oxygen is the most critical water quality parameter. Both hypoxia (low oxygen) and hyperoxia (too much oxygen) can compromise fish welfare. Maintain oxygen saturation close to 100%, although levels between 80–120% may be tolerated for short periods.
(b) Carbon dioxide;	CZ (Drafting suggestions): ~~**Carbon dioxide;**~~ CZ (Comments): We consider monitoring certain specific physical and chemical parameters of water during transport to be illogical and also difficult to implement, or even impossible. This mainly concerns the monitoring of carbon dioxide (CO2) and ammoniacal nitrogen (NH3). Although both chemicals can be determined very approximately in the field (CO2 using pH and water hardness; ammoniacal nitrogen using indicator tests), accurate determination of values requires laboratory analysis of water samples. However, both parameters depend on other parameters – the occurrence of free CO2 and the presence of toxic NH3 depend primarily on the pH of the water, and in the case of CO2, also on the density of fish (as a product of respiration) in the transport tank, while water temperature also plays a role in the relative proportion of NH3 (a product of fish metabolism). We therefore consider monitoring these parameters to be pointless, as they cannot be effectively reduced if risk values are exceeded other than by

Pcy Text	Drafting suggestions and Comments
	adjusting oxygen saturation, lowering the water temperature, and/or adjusting the pH. It should be therefore considered to monitor water quality parameters by measuring O2 saturation, water temperature, and pH by the means of portable devices (e.g. multimeters). The proposed text does not indicate how the limits for individual physical and chemical parameters of water during transport will be set. Will they be inferred on the basis of scientific, experimental, practical, or precautionary knowledge? We propose that the species (and size categories) specific parameters could be set in delegated act. ES (Comments): Measuring CO_2 levels during transport is very difficult and/or costly, and is not operationally feasible. We consider imposible the calibration of such equipment during the journey. FI (Drafting suggestions): ~~[(b) Carbon dioxide~~] FI (Comments): is there scientific base for this requirement? FR (Drafting suggestions): ~~**(b) Carbon dioxide;**~~ FR (Comments):

Pcy Text	Drafting suggestions and Comments
	C'est une valeur à prendre avec précaution car cela dépend à la fois du pH et du pouvoir tampon de l'eau (dureté carbonatée). En pratique, les transporteurs pratiquent une aération (à l'air) pour dégazer l'eau de son CO2. FR (Drafting suggestions): ~~**(b) Carbon dioxide;**~~ FR (Comments): This is a value to be taken with caution because it depends on both the pH and the buffering power of the water (carbonate hardness). In practice, transporters use (air) ventilation to degas the water from its CO2. GR (Drafting suggestions): Keep pH level between 7.8-8.4 during transportation for marine species and 6.5- 8.4 for fresh water species, during transportation. GR (Comments): We consider monitoring certain specific physical and chemical parameters of water during transport to be illogical and also difficult to implement, or even impossible. This mainly concerns the monitoring of carbon dioxide (CO_2) and ammoniacal nitrogen (NH_3). Although both chemicals can be determined very approximately in the field (CO_2 using pH and water hardness; ammoniacal nitrogen using indicator tests), accurate determination of values requires laboratory analysis of water samples. However, both variables depend on other parameters – the occurrence of free CO_2 and the presence of toxic NH3 depend primarily on the pH of the water, and in the case of CO_2, also on the density of fish (as a product of respiration) in the transport tank, while water temperature also plays a role in the relative proportion of NH_3 (a product of fish metabolism). We therefore consider

Pcy Text	Drafting suggestions and Comments
	monitoring these parameters to be pointless, as they cannot be effectively reduced if risk values are exceeded other than by adjusting oxygen saturation, lowering the water temperature, and adjusting the pH. We therefore consider it relevant to monitor water quality parameters during long-distance transport of aquatic animals only by measuring O_2 saturation, water temperature, and, if necessary, pH. The documents submitted also do not indicate how the limits for individual physical and chemical properties of water during transport are set. Will they be inferred on the basis of scientific, experimental, practical, or precautionary knowledge. HR (Drafting suggestions): ~~(b) Carbon dioxide;~~ IT (Drafting suggestions): ~~Carbon dioxide~~ **Ph** IT (Comments): Ph instead of Carbon dioxide is the water parameter normally monitored during transport of aquaculture fishes LV (Drafting suggestions): ~~Keep pH level between 7.8-8.4 during transportation for marine species and 6.5- 8.4 for fresh water species, during transportation.~~ LV (Comments): ~~We consider monitoring certain specific physical and chemical parameters of water during transport to be illogical and also difficult to implement, or even impossible. This mainly concerns the monitoring of carbon dioxide~~

Pcy Text	Drafting suggestions and Comments
	~~(CO_2) and ammoniacal nitrogen (NH_3). Although both chemicals can be determined very approximately in the field (CO_2 using pH and water hardness; ammoniacal nitrogen using indicator tests), accurate determination of values requires laboratory analysis of water samples. However, both variables depend on other parameters – the occurrence of free CO_2 and the presence of toxic NH3 depend primarily on the pH of the water, and in the case of CO_2, also on the density of fish (as a product of respiration) in the transport tank, while water temperature also plays a role in the relative proportion of NH_3 (a product of fish metabolism). We therefore consider monitoring these parameters to be pointless, as they cannot be effectively reduced if risk values are exceeded other than by adjusting oxygen saturation, lowering the water temperature, and adjusting the pH. We therefore consider it relevant to monitor water quality parameters during long-distance transport of aquatic animals only by measuring O_2 saturation, water temperature, and, if necessary, pH. The documents submitted also do not indicate how the limits for individual physical and chemical properties of water during transport are set. Will they be inferred on the basis of scientific, experimental, practical, or precautionary knowledge.~~ PL (Drafting suggestions): ~~(b) Carbon dioxide;~~ PL (Comments): The parameters that are crucial for fish well-being during transport are temperature and oxygen. Measuring carbon dioxide levels is unjustified because oxygenation during transport simultaneously aerates the water and removes excess carbon dioxide. Monitoring ammonia levels during transport is practically impossible because the total ammonia level does not indicate its toxicity to fish, and checking the level of non-ionized ammonia, which could have a potentially negative impact on the well-being of transported fish, is a

Pcy Text	Drafting suggestions and Comments
	function of the water's pH and temperature. Therefore, a fish transport vehicle would require a small laboratory and qualified drivers who, after measuring pH, total ammonia, and temperature, would read the non-ionized ammonia level from the tables. This is physically impossible, not to mention the time-consuming nature of such a laboratory procedure and would unnecessarily prolong transport time. PT (Drafting suggestions): (b) **PH** ~~Carbon dioxide~~; PT (Comments): The amount of CO2 influences the pH RO (Drafting suggestions): Keep pH level between 7.8-8.4 during transportation for marine species and 6.5- 8.4 for fresh water species, during transportation. RO (Comments): We consider monitoring certain specific physical and chemical parameters of water during transport to be illogical and also difficult to implement, or even impossible. This mainly concerns the monitoring of carbon dioxide (CO_2) and ammoniacal nitrogen (NH_3). Although both chemicals can be determined very approximately in the field (CO_2 using pH and water hardness; ammoniacal nitrogen using indicator tests), accurate determination of values requires laboratory analysis of water samples. However, both variables depend on other parameters – the occurrence of free CO_2 and the presence of toxic NH3 depend primarily on the pH of the water, and in the case of CO_2, also on the density of fish (as a product of respiration) in the transport tank, while water temperature also plays a role in the relative

Pcy Text	Drafting suggestions and Comments
	proportion of NH_3 (a product of fish metabolism). We therefore consider monitoring these parameters to be pointless, as they cannot be effectively reduced if risk values are exceeded other than by adjusting oxygen saturation, lowering the water temperature, and adjusting the pH. We therefore consider it relevant to monitor water quality parameters during long-distance transport of aquatic animals only by measuring O_2 saturation, water temperature, and, if necessary, pH. The documents submitted also do not indicate how the limits for individual physical and chemical properties of water during transport are set. Will they be inferred on the basis of scientific, experimental, practical, or precautionary knowledge.
(c) Ammonia level;	CZ (Drafting suggestions): ~~**Ammonia level;**~~ CZ (Comments): The same comments as to carbon dioxide: We consider monitoring certain specific physical and chemical parameters of water during transport to be illogical and also difficult to implement, or even impossible. This mainly concerns the monitoring of carbon dioxide (CO2) and ammoniacal nitrogen (NH3). Although both chemicals can be determined very approximately in the field (CO2 using pH and water hardness; ammoniacal nitrogen using indicator tests), accurate determination of values requires laboratory analysis of water samples.

Pcy Text	Drafting suggestions and Comments
	However, both parameters depend on other parameters – the occurrence of free CO2 and the presence of toxic NH3 depend primarily on the pH of the water, and in the case of CO2, also on the density of fish (as a product of respiration) in the transport tank, while water temperature also plays a role in the relative proportion of NH3 (a product of fish metabolism). We therefore consider monitoring these parameters to be pointless, as they cannot be effectively reduced if risk values are exceeded other than by adjusting oxygen saturation, lowering the water temperature, and/or adjusting the pH. It should be therefore considered to monitor water quality parameters by measuring O2 saturation, water temperature, and pH by the means of portable devices (e.g. multimeters). The proposed text does not indicate how the limits for individual physical and chemical parameters of water during transport will be set. Will they be inferred on the basis of scientific, experimental, practical, or precautionary knowledge? We propose that the species specific parameters could be set in delegated act. DE (Drafting suggestions): (c) Ammonia **and nitrite** level; DE (Comments): Along with ammonia nitrite is most toxic for fish and should also be measured. Any measurable nitrite concentration should be avoided. ES (Comments):

Pcy Text	Drafting suggestions and Comments
	Measuring ammonia (NH_3) levels during transport is very difficult and/or costly, and is not operationally feasible. Calibration of the equipment during the journey would be impossible. FI (Drafting suggestions): ~~[(c) Ammonia level;]~~ FI (Comments): is there scientific base for this requirement? FR (Drafting suggestions): ~~**(c) Ammonia level;**~~ FR (Comments): Cette valeur n'a pas de sens puisqu'on a une coexistence de NH3 et NH4+ dans l'eau avec des proportions qui dépendent du pH. Or, c'est la forme NH3 qui est hautement toxique alors que NH4+ ne l'est pratiquement pas. Autrement dit, on peut avoir une valeur totale élevée mais sans dangerosité à cause d'un pH bas et au contraire une valeur totale faible mais dangereuse parce que le pH est élevé. FR (Drafting suggestions): ~~**(c) Ammonia level;**~~ FR (Comments): This value makes no sense since there is a coexistence of NH3 and NH4+ in water with pH-dependent proportions.

Pcy Text	Drafting suggestions and Comments
	However, it is the form NH3 which is highly toxic whereas NH4+ is practically not. In other words, a high but safe total value can be achieved because of a low pH and, on the contrary, a low but dangerous total value can be reached because the pH is high. GR (Comments): Difficult to monitor and expensive. See comments in (b). HR (Drafting suggestions): ~~(c) Ammonia level;~~ LV (Comments): ~~Difficult to monitor and expensive. See comments in (b).~~ PL (Drafting suggestions): ~~(c) Ammonia level;~~ PL (Comments): As above. RO (Comments): Difficult to monitor and expensive. See comments in (b). SE (Drafting suggestions): (c) Ammonia level **and pH**;

Pcy Text	Drafting suggestions and Comments
	SE (Comments): pH is a very important parameter for water quality.
	FI (Comments): why not pH?
(d) Temperature.	CZ (Comments): We propose that the species specific parameters could be set in delegated act. Different for summer and winter periods, oxygen saturation is cruical even though the water temperature is higher. GR (Comments): Water temperature. Within limits ± 2ºC compared to loading and unloading temperature. Fish should be acclimatised before unloading if the destination water differs significantly in quality—such as in temperature, salinity, or pH. HR (Drafting suggestions): ~~(d) Temperature.~~ LV (Comments): ~~Water temperature. Within limits ± 2ºC compared to loading and unloading temperature. Fish should be acclimatised before unloading if the destination water differs significantly in quality—such as in temperature, salinity, or pH.~~ RO (Comments):

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Pcy Text	Drafting suggestions and Comments
	Water temperature. Within limits ± 2ºC compared to loading and unloading temperature. Fish should be acclimatised before unloading if the destination water differs significantly in quality—such as in temperature, salinity, or pH.
	AT (Drafting suggestions): **e) salinity** DE (Drafting suggestions): **3.3 Operators shall ensure, where necessary, the monitoring of water parameters to account for point 3.2 and provide written instructions.** DE (Comments): Please refer to our comment under point 3.2. It may also be sufficient to carry out monitoring of certain paramters only periodically. We therefore recommend that monitoring is carried out in accordance with the written instructions based on the operator's risk assessment. FR (Drafting suggestions): **(e) pH** FR (Drafting suggestions): **(e) pH** PT (Drafting suggestions): salinity PT

Pcy Text	Drafting suggestions and Comments
	(Comments): Propose to include this parameter
4. Fitness for transport	LT (Comments): Such a separate section for aquatic animals somewhat undermines the unified structure of the legal act, since there is already a separate chapter of the proposal on animal fitness for transport.
4.1. The ability of the aquatic animals to cope with the stress of transport shall be assessed based on health status, previous handling, and recent transport history.	DE (Drafting suggestions): 4.1. The ability of the aquatic animals to cope with the stress of transport shall be assessed **by the keepers** based on health status, previous handling, and recent transport history. DE (Comments): We think it is important to clearly adress who is responsible. In our opinion, the keepers at the place of departure or at handling facilities should assess the fitness of transport under this point. FI (Comments): By who and how? FR (Drafting suggestions): 4.1. The ability of the aquatic animals to cope with the stress of transport shall be assessed based on **species, age and/or category**, health status, previous handling, and recent transport history. FR

Pcy Text	Drafting suggestions and Comments
	(Drafting suggestions): 4.1. The ability of the aquatic animals to cope with the stress of transport shall be based on **species, age and/or category**, health status, previous handling, and recent transport history. GR (Drafting suggestions): The ability of the aquatic animals to cope with the stress of transport shall be assessed and verified by trained personnel based on health status, previous handling, and recent transport history. HR (Drafting suggestions): **Operators shall asses** ~~T~~the ability of the aquatic animals to cope with the stress of transport ~~shall be assessed~~ based on health status, previous handling, and recent transport history. LV (Drafting suggestions): The ability of the ~~**aquatic animals**~~ **farmed fish** to cope with the stress of transport shall be assessed based on health status, previous handling, and recent transport history.~~The ability of the aquatic animals to cope with the stress of transport shall be assessed and verified by trained personnel based on health status, previous handling, and recent transport history.~~ PL (Drafting suggestions): ~~4.1. The ability of the aquatic animals to cope with the stress of transport shall be assessed based on health status, previous handling, and recent transport history.~~ PL

Pcy Text	Drafting suggestions and Comments
	(Comments): This point seems redundant when read together with point 4.2 which mentiones specific situations when the animals are not considered fit for transport. RO (Drafting suggestions): The ability of the aquatic animals to cope with the stress of transport shall be assessed and verified by trained personnel based on health status, previous handling, and recent transport history. SE (Drafting suggestions): 4.1. The ability of the aquatic animals to cope with the stress of transport shall be assessed based on **species, life stage, environmental factors,** health status, previous handling, and recent transport history. SE (Comments): Stress is dependent on more factors than health status, previous handling, and recent transport history.
4.2. The main reasons for considering aquatic animals as not fit for transport are:	FI (Drafting suggestions): ~~The main reasons for considering a~~**A**quatic animals ~~as~~ **are** not fit for transport ~~are~~ if they: SE (Drafting suggestions): ~~The main reasons for considering a~~**A**quatic animals ~~as~~ **are** not fit for transport ~~are~~ if they:

Pcy Text	Drafting suggestions and Comments
	SE (Comments): In line with Chapter I Annex I.
(a) displaying clinical signs of disease;	FI (Drafting suggestions): (a) ~~displaying~~ **show** clinical signs of disease; SE (Drafting suggestions): (a) ~~displaying~~ **show** clinical signs of disease;
	LV (Drafting suggestions): **(a1) displaying invasion of ectoparasites;**
(b) significant physical injuries or abnormal behaviour;	DE (Drafting suggestions): (b) significant ~~physical~~ injuries or abnormal behaviour; DE (Comments): We are not sure, why the adjective 'physical' is necessary. We think it is dispensible and suggest to delete it. FI (Drafting suggestions): (b) **have** significant physical injuries or abnormal behaviour GR (Comments):

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Pcy Text	Drafting suggestions and Comments
	Define "significant" and "abnormal" behavior. LV (Comments): ~~Define "significant" and "abnormal" behavior.~~ RO (Comments): Define "significant" and "abnormal" behavior. SE (Drafting suggestions): (b) **have** significant physical injuries or abnormal behaviour
(c) recent exposure to stressors that adversely affect behaviour or physiological state (for example extreme temperatures, chemical agents);	FI (Drafting suggestions): [(c) **have had** recent exposure to stressors that adversely affect behaviour or physiological state (for example extreme temperatures, chemical agents);] FI (Comments): this may also be considered in point 4.1 GR (Comments): This need to be clarified. LV (Comments): ~~This need to be clarified.~~ PT

Pcy Text	Drafting suggestions and Comments
	(Comments): It is unclear in practical terms how to assess this exposure. RO (Comments): This need to be clarified. SE (Drafting suggestions): [(c) **have had** recent exposure to stressors that adversely affect behaviour or physiological state (for example extreme temperatures, chemical agents);] SE (Comments): Also in 4.1
(d) insufficient or excessive length of fasting.	CZ (Drafting suggestions): (~~**d) insufficient or excessive length of fasting**~~ CZ (Comments): There are no indicators defined for insufficient or excessive fasting of fish, this can be 24 hours or even several months, depending on the season, water temperature, condition of the fish, etc.). It is undesirable to transport fish earlier than a day after feeding, but excessive fasting is very difficult to argue in practice, as the final limit would be defined by cachexia, and in that case, the fish are already unfit for transport. ES

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Pcy Text	Drafting suggestions and Comments
	(Comments): Fasting, as well as stocking density, varies greatly between species and cannot be easily defined in a general way. There is currently no scientific basis to establish precise limits for these parameters. FI (Drafting suggestions): [(d) **have had** insufficient or excessive length of fasting] FI (Comments): How this can be supervised in OC? How insufficient or excessive fasting are defined? Does this result in some limit based on the number of degree days, or how is it assessed? GR (Comments): How can it be determined exactly whether the duration is not adequate? This needs to be clarified. It is undesirable to transport fish less than a day after feeding, but excessive fasting is very difficult to argue in practice, as the final limit would be defined by cachexia, and in that case, the fish are already unfit for transport. A fasting period of 10-20 degree-days before transport can be applied to reduce fecal waste and ammonia production and maintain water quality as a best solution. IT (Drafting suggestions): ~~(d)insufficient or excessive length of fasting~~ IT (Comments):

Pcy Text	Drafting suggestions and Comments
	fasting is a key element for transport of aquaculture animals, so in our opinion it should not be considerate to evaluate the fitness for transport LV (Comments): ~~How can it be determined exactly whether the duration is not adequate? This needs to be clarified.~~ ~~It is undesirable to transport fish less than a day after feeding, but excessive fasting is very difficult to argue in practice, as the final limit would be defined by cachexia, and in that case, the fish are already unfit for transport. A fasting period of 10-20 degree-days before transport can be applied to reduce fecal waste and ammonia production and maintain water quality as a best solution.~~ NL (Drafting suggestions): insufficient or excessive length of fasting, **as determined by species specific scientific data.** NL (Comments): Suitable feeding patterns for transport are species specific and need to be determined based on scientific data as to really take into account the needs of the animal during transport. This should also be inlcuded in article 47, so that the Commission is empowered to adopt delegated acts on this matter accodring to article 48. RO (Comments): How can it be determined exactly whether the duration is not adequate? This needs to be clarified. It is undesirable to transport fish less than a day after feeding, but excessive fasting is very difficult to argue in practice, as the final limit would be

Pcy Text	Drafting suggestions and Comments
	defined by cachexia, and in that case, the fish are already unfit for transport. A fasting period of 10-20 degree-days before transport can be applied to reduce fecal waste and ammonia production and maintain water quality as a best solution. SE (Drafting suggestions): [(d) **have had** insufficient or excessive length of fasting]
5. Loading practices	
5.1. Operators shall take the necessary measures to avoid any injury and unnecessary stress to aquatic animals during loading.	DE (Drafting suggestions): 5.1. ~~Operators~~ **Keepers** shall take the necessary measures to avoid any injury and unnecessary stress to aquatic animals during loading. DE (Comments): In our view this should be the responsibility of the keepers as they are directly involved in handling the animals. The operators' reponsibility is to ensure that proper equipement, trained personel and operating procedures are in place. FI (Comments): This is already mainly covered on article 4 points 2 d and e FR (Drafting suggestions): 5.1. Operators shall take the necessary measures to avoid any injury and unnecessary stress to aquatic animals during **preparation and** loading.

Pcy Text	Drafting suggestions and Comments
	FR (Comments): La préparation fait référence à la mise à jeûn possible, le « resserement » des bassins et l'attrapage avant transfert sans retard indu. FR (Drafting suggestions): 5.1. Operators shall take the necessary measures to avoid any injury and unnecessary stress to aquatic animals during **preparation and** loading. FR (Comments): The preparation refers to possible fasting, 'tightening' of the basins and catching before transfer without undue delay. SE (Comments): Already mainly covered on article 4 points 2 d) and e)
5.2. At loading, the following shall be assessed:	FI (Comments): How does this assessment affect loading practices or welfare of aquatic animals? Who assesses and who is responsble? How this can be supervised? Book keeping? Part of self-monitoring?
(a) crowding procedure prior to loading;	
(b) inappropriately constructed or operated equipment;	

Pcy Text	Drafting suggestions and Comments
(c) significant changes in the water quality such as different temperature or other water parameters.	
	FI (Drafting suggestions): **d) if assesment of points a-c reveals conditions that may negatively affect the welfare of aquatic animals the operators must correct the condition before continuing loading.** SE (Drafting suggestions): **d) if assesment of points a-c reveals conditions that may negatively affect the welfare of aquatic animals the operators must correct the condition before continuing loading.**
5.3. Operators shall ensure the density of aquatic animals in a vehicle and/or container is maintained within the appropriate limits taking into account the species specific needs and the scientific data available.	AT (Comments): High-density crowding could affect animal welfare. CZ (Drafting suggestions): 5.3. Operators shall ensure the density of aquatic animals in a vehicle and/or container is maintained within the appropriate limits taking into account the species **and size categories** specific needs and the scientific data available. CZ (Comments):

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Pcy Text	Drafting suggestions and Comments
	Nowhere is it specified what species-specific fish densities will be accepted. Will this be inferred on the basis of scientific, experimental, practical, or precautionary knowledge? We propose that the species and size categories specific parameters could be set in delegated act. DE (Drafting suggestions): 5.3. ~~Operators~~ **Keepers** shall ensure the density of aquatic animals in a vehicle and/or container is maintained within the appropriate limits taking into account the species specific needs and the scientific data available. DE (Comments): Please refer to our comment under 5.1. ES (Comments): There are no species-specific scientific limits for these parameters, which makes their practical application and enforcement difficult. FI (Drafting suggestions): 5.3. Operators shall ensure the density of aquatic animals in a vehicle and/or container is maintained within the ~~appropriate~~ **such** limits ~~taking into account the species specific needs and the scientific data available~~ **that every animal is able to change its position freely**~~.~~ GR (Drafting suggestions): Operators shall ensure the density of aquatic animals in a vehicle and/or container is maintained within the appropriate limits taking into account the

Pcy Text	Drafting suggestions and Comments
	species specific needs, the life-cycle phase and size of the fish, the physical condition of the fish, and the scientific data available. GR (Comments): This needs to be specifically clarified and find ways for inspectors to calculate. Guidelines from EURCAW Aqua might be useful. HR (Drafting suggestions): Operators shall ensure the density of aquatic animals in a vehicle and/or container is maintained within the appropriate limits taking into account **the duration of transport**, the species specific needs and the scientific data available IT (Drafting suggestions): ~~5.3. Operators shall ensure the density of aquatic animals in a vehicle and/or container is maintained within the appropriate limits taking into account the species specific needs and the scientific data available.~~ IT (Comments): It is not possible for the drivers or attendants to act directly on the density of the animals. It is possible to eliminate dead animals lying on the surface of the water in the tanks, during stop to check the animals, and to indirectly act on the density LV (Drafting suggestions): ~~Operators shall ensure the density of aquatic animals in a vehicle and/or container is maintained within the appropriate limits taking into account the~~

Pcy Text	Drafting suggestions and Comments
	~~species specific needs, the life-cycle phase and size of the fish, the physical condition of the fish, and the scientific data available.~~ LV (Comments): ~~This needs to be specifically clarified and find ways for inspectors to calculate. Guidelines from EURCAW Aqua might be useful.~~ NL (Comments): It is very important for the animal welfare to include species specific density measures when they are available. This should also be inlcuded in article 47, so that the Commission is empowered to adopt delegated acts on this matter accodring to article 48. PL (Drafting suggestions): 5.3. Operators shall ensure the density of aquatic animals in a vehicle and/or container is maintained within the appropriate limits taking into account the species specific needs ~~and the scientific data available.~~ PL (Comments): Please include the relevant scientific data into the regulation or this reference must be deleted altogether, as it is unclear and difficult to implement and to control from the point of view of the CA. PT (Comments): We believe that the reference centre or the Commission should define these values. We propose inserting text stipulating that these parameters should be defined by means of a delegated or implementing act.

Pcy Text	Drafting suggestions and Comments
	RO (Drafting suggestions): Operators shall ensure the density of aquatic animals in a vehicle and/or container is maintained within the appropriate limits taking into account the species specific needs, the life-cycle phase and size of the fish, the physical condition of the fish, and the scientific data available. RO (Comments): This needs to be specifically clarified and find ways for inspectors to calculate. Guidelines from EURCAW Aqua might be useful. SE (Comments): What conditions apply to wellboats or to aquatic enclosures/nets that are pulled by a boat?
	AT (Drafting suggestions): **Since fish grow at different rates, where appropriate, they shall be separated according to size.** AT (Comments): In order to minimise stress, aggression and cannibalism DE (Drafting suggestions): **5.4. Containers shall be secured before the start of the journey to prevent displacement due to the movement of the means of transport.** DE

Pcy Text	Drafting suggestions and Comments
	(Comments): It should be ensured that containers cannot fall or tip over. Suggested wording is taken from Point 4.2 Chapter II of Annex I.
5.4. Loading shall be carried out by operators with knowledge and experience of the behaviour and other characteristics of the aquatic animals with the aim to ensure their welfare.	ES (Comments): A harmonised and formal training framework with minimum content requirements should be established for operators involved in loading. FI (Drafting suggestions): ~~5.4. Loading shall be carried out by operators with knowledge and experience of the behaviour and other characteristics of the aquatic animals with the aim to ensure their welfare~~. FI (Comments): This is already covered in article 4 point e FR (Drafting suggestions): 5.4. **The preparation and** loading shall be carried out by operators with knowledge and experience of the behaviour and other characteristics of the aquatic animals with the aim to ensure their welfare. FR (Drafting suggestions): 5.4. **The preparation and** loading shall be carried out by operators with knowledge and experience of the behaviour and other characteristics of the aquatic animals with the aim to ensure their welfare. GR

Pcy Text	Drafting suggestions and Comments
	(Comments): This needs to be documented or be included in the content of training courses. HR (Drafting suggestions): Loading shall be carried out **under supervision of the** ~~by~~ operators with knowledge and experience of the behaviour and other characteristics of the aquatic animals with the aim to ensure their welfare. LV (Comments): ~~This needs to be documented or be included in the content of training courses.~~ PT (Comments): We believe that this point should be updated in line with what is determined regarding compulsory training. RO (Comments): This needs to be documented or be included in the content of training courses. SE (Comments): This is already covered in article 4 point e
6. During transport	

Pcy Text	Drafting suggestions and Comments
6.1. Periodic inspections **shall** ~~should~~ take place during the transport to verify that acceptable welfare is being maintained.	DE (Drafting suggestions): 6.1. ~~Periodic inspections~~ **If not otherwise specified, the attendant shall check on the animals according to the instructions by the operator** ~~should take place~~ during the transport to verify that acceptable welfare is being maintained. DE (Comments): The term 'periodic' is too vague. The term 'inspections' should be used only when CA are involved. According to Article 19(1) the consigment shall be checked every 4,5 hours by road. However, according to Article 19(4a) on journeys including a leg on a ro-ro-ferry no minimum checking intervals are foreseen for aquatic animals. In these particular cases the checking intervals should should follow the operator's instructions. ES (Comments): Those periodic inspections are not feasible during transport. In many types of tanks and containers, fish are not visible and opening them would compromise water quality and biosecurity. FI (Drafting suggestions): ~~6.1. Periodic inspections shall should take place during the transport to verify that acceptable welfare is being maintained~~. FI (Comments): This can be deleted, it is already covered in article 4 point 2 g and in article 19 points 0 and 1.

Pcy Text	Drafting suggestions and Comments
	FR (Comments): Même proposition que pour les transports d'animaux terrestres selon la réglementation sociale des chauffeurs : soit juste avant leur pause (article 19 point 1). FR (Comments): Same proposal as for the transport of terrestrial animals under the social rules for drivers: just before their break (article 19 point 1). GR (Drafting suggestions): Periodic inspections (every 4h) shall take place during the transport to verify that acceptable welfare is being maintained. The inspections shall be recorded on the journey log. HU (Comments): This requirement is a bit vauge precisification required LV (Drafting suggestions): ~~Periodic inspections (every 4h) shall take place during the transport to verify that acceptable welfare is being maintained. The inspections shall be recorded on the journey log.~~ NL (Drafting suggestions):

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Pcy Text	Drafting suggestions and Comments
	6.1. Periodic ~~inspections~~ **checks** shall take place during the transport **in the intervals as laid down in article 19** to verify that acceptable welfare is being maintained. NL (Comments): It is important to make sure that the checks are performed in the intervals stated in article 19. This makes everything more clear for the operator. Apart from that we think is is important to use the same terms as in article 19 (checks in stead of inspection). Otherwise these checks could become confused with the official inspections to be performed by the competent authority. PT (Comments): It would be good to determine how often, otherwise it will be a very vague rule. For the transport of goods in tanks, monitoring should be every 4.5 hours. For the transport of ornamental fish, this will not be possible, so this check is only carried out at departure, transfer points and on arrival, and on a sample of animals. However, it must be ensured that the water parameters allow the fish to be kept for at least 48 hours without any intervention or handling. RO (Drafting suggestions): Periodic inspections (every 4h) shall take place during the transport to verify that acceptable welfare is being maintained. The inspections shall be recorded on the journey log. SE (Comments): Already covered in article 4 point 2 g and in article 19 points 0 and 1.

Pcy Text	Drafting suggestions and Comments
6.2. Drivers or attendants shall monitor the water quality and make the necessary adjustments to ensure the parameters enumerated in point 3.2 are maintained within the appropriate limits taking into account the species-specific needs.	CZ (Drafting suggestions): Drivers or attendants shall ~~**monitor**~~ **control** the water quality and make the necessary adjustments to ensure the parameters enumerated in point 3.2 are maintained within the appropriate limits taking into account the species-specific and **size categories-specific** needs. CZ (Comments): Certain physical and chemical parameters of water (i.e. carbon dioxide, ammoniacal nitrogen) are very complicated or even unfeasible to determine qualitatively during transport, let alone to make the adjustments. See comments above. DE (Drafting suggestions): 6.2. ~~Drivers or attendants~~ **Attendants** shall monitor the water quality, ~~and~~ make the necessary adjustments to ensure the parameters enumerated in point 3.2 are maintained within the appropriate limits taking into account the species-specific needs**, and document their findings and actions**. DE (Comments): We suggest to delete 'Drivers' as only the attendants now have to achieve the needed level of competence according to Article 36b(3)(b)(ii) to perform the tasks under 6.2. For better traceability and enforcement, the attendant should document the monitoring and remedial action taken to restore the water parameters. The documentation can be performed in the animal journey log or in the future mobile application. ES

Pcy Text	Drafting suggestions and Comments
	(Comments): CO_2 and ammonia cannot be reliably measured during transport with the equipment currently available. Their routine monitoring is therefore not feasible at the moment. FI (Drafting suggestions): 6.2. ~~Drivers or a~~Attendants shall monitor the water quality and make the necessary adjustments to ensure the parameters enumerated in point 3.2 are maintained within the appropriate limits taking into account the species-specific needs **according to instructions from the organiser.** FI (Comments): To align with article 19 and to clarify. HU (Drafting suggestions): 6.2. Drivers ~~or attendants~~ shall monitor the water quality and make the necessary adjustments to ensure the parameters enumerated in point 3.2 are maintained within the appropriate limits taking into account the species-specific needs. HU (Comments): In line with the other part of the regulation IT (Drafting suggestions): ~~6.2. Drivers or attendants shall monitor the water quality and make the necessary adjustments to ensure the parameters enumerated in point 3.2 are~~

Pcy Text	Drafting suggestions and Comments
	~~maintained within the appropriate limits taking into account the species-specific needs.~~ IT (Comments): It is not possible during the journey to make any adjustment to the water parameters unless the driver/attendant stops in a suitable facility/establishment for a replacement of the water PL (Comments): In case of transport of aquatic animals without water other parameters must be taken into account. PT (Comments): The determination of parameters, their monitoring and correction must be in accordance with written procedures. There must be procedures in place. SE (Drafting suggestions): 6.2. ~~Drivers or a~~**A**ttendants shall monitor the water quality and make the necessary adjustments to ensure the parameters enumerated in point 3.2 are maintained within the appropriate limits taking into account the species-specific needs **according to instructions from the organiser.** SE (Comments): To align with article 19 and to clarify.

Pcy Text	Drafting suggestions and Comments
6.3. Drivers shall travel in a manner that minimises uncontrolled movements of the aquatic animals that may lead to stress and cause injury.	FI (Drafting suggestions): ~~6.3. Drivers shall travel in a manner that minimises uncontrolled movements of the aquatic animals that may lead to stress and cause injury~~. FI (Comments): This is alrady covered in article 19 point 2 a FR (Drafting suggestions): 6.3. Drivers shall travel in a manner that minimises uncontrolled movements of **water and** the aquatic animals that may lead to stress and cause injury. FR (Comments): C'est un point qui restera difficile à apprécier et à contrôler à moins d'être à bord du véhicule. Un moyen plus sûr est de contrôler le remplissage correct et suffisant des cuves pour éviter les mouvements d'eau trop importants. FR (Drafting suggestions): 6.3. Drivers shall travel in a manner that minimized uncontrolled movements of **water and** the aquatic animals that may lead to stress and cause injury. FR (Comments): This is a point that will remain difficult to appreciate and control unless you are in the vehicle.

Pcy Text	Drafting suggestions and Comments
	A safer way is to check the correct and sufficient filling of the tanks to avoid excessive water movements. GR (Drafting suggestions): ~~Drivers shall travel in a manner that minimises uncontrolled movements of the aquatic animals that may lead to stress and cause injury~~ GR (Comments): How can this be documented? Via speed recordings? We propose to delete this phrase. IT (Drafting suggestions): ~~6.3. Drivers shall travel in a manner that minimises uncontrolled movements of the aquatic animals that may lead to stress and cause injury.~~ IT (Comments): The way of driving during the transport of aquatic species it is not such relevant as for the transport of terrestrial animals LV (Drafting suggestions): ~~**Drivers shall travel in a manner that minimises uncontrolled movements of the aquatic animals that may lead to stress and cause injury**~~ LV (Comments): ~~How can this be documented? Via speed recordings? We propose to delete this phrase.~~

Pcy Text	Drafting suggestions and Comments
	PL (Drafting suggestions): ~~6.3. Drivers shall travel in a manner that minimises uncontrolled movements of the aquatic animals that may lead to stress and cause injury.~~ PL (Comments): Is there an analogous requirement for transporting terrestrial animals or for transport of aquatic animals on other means of transport which is also subject to movement? This point is redundant and does not correspond to the relevent requirements for terrrestrial animals. PT (Comments): See comment on the need for training and skills. RO (Drafting suggestions): ~~Drivers shall travel in a manner that minimises uncontrolled movements of the aquatic animals that may lead to stress and cause injury~~ RO (Comments): How can this be documented? Via speed recordings? We propose to delete this phrase. SE (Comments): This is already covered in article 19 point 2 a) Somewhere should be stated that care needs to be taken to avoid excessive noise and vibrations. Speed is especially important when pulling an enclosure by boat.

Pcy Text	Drafting suggestions and Comments
6.4. In the event of health emergency during transport, the driver or an attendant shall initiate the contingency plan.	ES (Comments): A contingency plan specific to fish should be required, given the particularities of aquatic animals and transport conditions. FI (Drafting suggestions): 6.4. In the event of health emergency during transport, ~~the driver or~~ an attendant shall initiate the contingency plan FI (Comments): To align with article 19. GR (Comments): The contingency plan should be written by the transportation company. HU (Drafting suggestions): 6.4. In the event of health emergency during transport, the driver ~~or an attendant~~ shall initiate the contingency plan. HU (Comments): In line with the other part of the regulation LV (Comments): ~~The contingency plan should be written by the transportation company.~~ NL

Pcy Text	Drafting suggestions and Comments
	(Drafting suggestions): 6.4. In the event of ~~health~~ emergency during transport, the driver or an attendant shall initiate the contingency plan **referred to in article 8(3)(b)(iii).** NL (Comments): This should cover any emergency and not just health emergencies. PL (Drafting suggestions): ~~6.4. In the event of health emergency during transport, the driver or an attendant shall initiate the contingency plan.~~ PL (Comments): Does this refer to the health of the attendant or the animals? Either way, the use of contingency plans is mentioned elsewhere so this point is redundant. PT (Comments): Contingency reasons are not limited to health reasons. There may be delays, breakdowns, etc. Carriers must develop a contingency plan for each trip/route in coordination with the organiser. RO (Comments): The contingency plan should be written by the transportation company. SE (Drafting suggestions):

Pcy Text	Drafting suggestions and Comments
	6.4. In the event of health **or welfare** emergency during transport, ~~the driver or~~ an attendant shall initiate the contingency plan SE (Comments): In line with article 19.
6.5. If the killing of aquatic animals is necessary during the transport, ~~the driver or~~ the attendant shall be trained and capable to perform the killing with prior stunning so that animals remain unconscious until death.	CZ (Drafting suggestions): If the killing of aquatic animals is necessary during the transport, ~~the driver or~~ the attendant shall be trained and capable to perform the killing ~~with prior stunning so that animals remain unconscious until death.~~ CZ (Comments): Not applicable provision. In case of fish, having stunning and killing equipment during transport is impossible. Furthermore, it would cause significant health and hygiene problems for the disposal of dead fish and security for operators. It is also necessary to take into account the size and quantity of fish being transported (even several tons in trucks), as such an activity is completely unfeasible during transport. We cannot imagine killing a large shipment of fish on site. Perhaps individual specimens, but it is unrealistic to catch them, except perhaps when transporting a few units. However, we agree that contingency plans of transporters should include specific procedures for killing individual fish if necessary, or measures to be taken in the event of death of part of a fish shipment. DE

Pcy Text	Drafting suggestions and Comments
	(Comments): We are in favour of this provision, but see the necessity for adequate training of the attendant to be able to perform this task in an animal welfare friendly manner. Please refer to our respectiv comments of the consultations concerning Article 36b(3)(d). ES (Drafting suggestions): a ES (Comments): Killing acuatic animals on board during transport does not appear feasible or practical. The elimination of dead fish during the journey would also pose significant hygiene and safety problems for operators. For these reasons, killing fish during transport is not applicable and should be carried out only at the end of the journey. In addition, no species-specific stunning methods for fish are established in Annex I of Regulation (EC) No 1099/2009. FI (Drafting suggestions): ~~6.5. If the killing of aquatic animals is necessary during the transport, the driver or the attendant shall be trained and capable to perform the killing with prior stunning so that animals remain unconscious until death~~ FI (Comments): This may be impossible for whole consignment. FR

Pcy Text	Drafting suggestions and Comments
	(Comments): Question : un convoyeur formé en fonction de l'espèce et aux techniques de mise à mort est-il obligatoire ? Dans ce cas, il devrait être précisé que les cadavres doivent être conservés jusqu'au lieu de déchargement pour être éliminés selon la filière appropriée et permettre le calcul du taux de mortalité en cours de transport précisé à l'art 188 de la LSA. FR (Comments): Question: Is a species-trained attendant and killing techniques mandatory? In this case, it should be specified that the corpses must be kept until the place of unloading in order to be disposed to the appropriate way and allow the calculation of the mortality rate during transport specified in Article 188 of the LSA. GR (Comments): Not applicable provision. In the case of fish, having stunning and killing equipment during transport is impossible. Furthermore, it would cause significant health and hygiene problems for the disposal of dead fish and security for operators. Furthermore, carrying prescribed anesthetic medicine in advance during the journey, might not possible at least in the case of fish transport with vessels. It is also necessary to take into account the size and quantity of fish being transported (even several tons in trucks), as such an activity is completely unfeasible during transport. We cannot imagine killing a large shipment of fish on site. Perhaps individual specimens, but it is unrealistic to catch them, except perhaps when transporting a few units.

Pcy Text	Drafting suggestions and Comments
	HR (Drafting suggestions): If the killing of aquatic animals is necessary during the transport, the driver or the attendant shall be trained and capable to perform the killing **using an appropriate method suitable for the species and size of the animal and preventing unnecessary suffering.** ~~with prior stunning so that animals remain unconscious until death~~ HU (Comments): Not applicable provision. For fish, the use of stunning and killing equipment during transport is not feasible and would also entail major hygiene and operator-safety risks. Carrying the prescribed anaesthetics in advance is likewise often impossible, particularly for transport by vessel. Moreover, there is currently no harmonised Union legal framework on killing methods for fish; if such requirements do not apply to terrestrial animals during road transport, it is unclear why they should apply in the case of fish. Given the considerable biomass involved (often several tonnes), such interventions cannot be carried out during transport. The on-site killing of large consignments is therefore unrealistic, and could only be considered, if at all, for a very limited number of individual specimens. IT (Drafting suggestions): ~~6.5. If the killing of aquatic animals is necessary during the transport, the driver or the attendant shall be trained and capable to perform the killing with prior stunning so that animals remain unconscious until death.~~ IT

Pcy Text	Drafting suggestions and Comments
	(Comments): The provision of this article is not applicable during the journey unless the driver/attendant stops in a suitable facility/establishment indicated in contingency plan LT (Comments): When transporting a large quantity in a container, e.g., fish, it will be difficult to identify a sick or injured animal that should be euthanized. Therefore, it is not appropriate to include a provision in the draft that would be impossible to implement. LV (Comments): Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing Annex I "List of stunning methods and related specifications" is not intended for farmed fish.~~Not applicable provision. In the case of fish, having stunning and killing equipment during transport is impossible. Furthermore, it would cause significant health and hygiene problems for the disposal of dead fish and security for operators. Furthermore, carrying prescribed anesthetic medicine in advance during the journey, might not possible at least in the case of fish transport with vessels.~~ ~~It is also necessary to take into account the size and quantity of fish being transported (even several tons in trucks), as such an activity is completely unfeasible during transport.~~ ~~We cannot imagine killing a large shipment of fish on site. Perhaps individual specimens, but it is unrealistic to catch them, except perhaps when transporting a few units.~~ NL (Drafting suggestions):

Pcy Text	Drafting suggestions and Comments
	If the killing of aquatic animals is necessary during the transport, the attendant shall be trained and capable to perform the killing **according to best available practise during transport as recommended by EURCAW-AQUA.** ~~with prior stunning so that animals remain unconscious until death.~~ NL (Comments): Stunning prior to killing is currently not an option on the road. The attendant shall be trained to handle according to the next best options available for the species. EURCAW-AQUA should provide recommendations for this based on the latest scientific data and update these recommendations regularly. PL (Drafting suggestions): ~~6.5. If the killing of aquatic animals is necessary during the transport, the driver or the attendant shall be trained and capable to perform the killing with prior stunning so that animals remain unconscious until death.~~ PL (Comments): It's impossible for a driver to have anesthetics (the use of which is strictly under veterinary supervision) or equipment for stunning or killing fish during transport. This is unrealistic to implement in practice. Emergency situations should be prevented by providing emergency water changes during transport or supplementing oxygen in containers designed for this purpose. PT (Comments): What methods of killing should be used depending on the different species and ages of animals? It seems complicated to us to kill animals during transport. There must be a contingency plan in place to deal with situations where many animals need to be killed.

Pcy Text	Drafting suggestions and Comments
	RO (Comments): Not applicable provision. In the case of fish, having stunning and killing equipment during transport is impossible. Furthermore, it would cause significant health and hygiene problems for the disposal of dead fish and security for operators. Furthermore, carrying prescribed anesthetic medicine in advance during the journey, might not possible at least in the case of fish transport with vessels. It is also necessary to take into account the size and quantity of fish being transported (even several tons in trucks), as such an activity is completely unfeasible during transport. We cannot imagine killing a large shipment of fish on site. Perhaps individual specimens, but it is unrealistic to catch them, except perhaps when transporting a few units.
7. Unloading practices	
7.1. The principles of good handling during loading apply equally during unloading.	FI (Comments): Already covered in article 4 points 2 d and e GR (Comments): Provisions of Section 5 apply to Section 7 as well. LV (Comments): ~~Provisions of Section 5 apply to Section 7 as well.~~

Pcy Text	Drafting suggestions and Comments
	RO (Comments): Provisions of Section 5 apply to Section 7 as well. SE (Comments): Already covered in article 4 points 2 d and e
7.2. Operators shall unload the aquatic animals as soon as possible after arrival at the destination, allowing sufficient time to avoid causing any harm to the animals.	DE (Drafting suggestions): 7.2. ~~Operators~~ **Keepers at the place of destination** shall **ensure the** unload**ing of** the aquatic animals as soon as possible after arrival at the destination, allowing sufficient time to avoid causing any harm to the animals. DE (Comments): We think this should be the responsibility of the keeper at the place of destination. Article 25(0) concerning the obligations of the keeper at the place of destination only accounts for terrestrial animals. In our view, analogous obligations should also apply to aquatic animals, and Article 25(0) should be amended accordingly. FI (Comments): A clear time frame could be better for official conrols. This is also in principle covered in article 2 point 2 f, because the loading and unloading are part of transport. SE (Comments):

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Pcy Text	Drafting suggestions and Comments
	A clear time frame could be better for official conrols. This is also in principle covered in article 2 point 2 f, because the loading and unloading are part of transport.
7.3. Operators shall consider enough time for acclimatisation of some species depending on their needs and before being unloaded into water of a significantly different quality (such as temperature, salinity, pH).	DE (Drafting suggestions): Delete DE (Comments): Aquatic animals should only be unloaded into water of a quality that meets their needs, particularly in terms of salinity, temperature, pH. Significantly different water quality will lead to suffering. Acclimatisation is not possible. Attempting to do so is contrary to animal welfare. We therefore suggest to delete this point. Alternatively, this point can be reworded to make the underlying intention clearer. FI (Drafting suggestions): 7.3. Operators shall ~~consider~~ **allow** enough time for acclimatisation of some species depending on their needs and before being unloaded into water of a significantly different quality (such as temperature, salinity, pH) GR (Comments): If fish are to be unloaded in different water parameters/quality, the operator should change the water in the containers/tanks [sea paragraph 3.1] with rearing water several times until fish are acclimatized to the rearing water condition. IT (Drafting suggestions):

Pcy Text	Drafting suggestions and Comments
	Operators shall consider enough time for acclimatisation of some species depending on their needs and before being unloaded into water of a significantly different quality (such as temperature, **salinity**, pH). IT (Comments): Word "salinity" appears for the first time in this article and could be probably deleted LV (Comments): ~~If fish are to be unloaded in different water parameters/quality, the operator should change the water in the containers/tanks [sea paragraph 3.1] with rearing water several times until fish are acclimatized to the rearing water condition.~~ NL (Drafting suggestions): Operators shall consider enough time for acclimatisation of some species depending on their needs and before being unloaded into water of a significantly different quality (such as temperature, ~~salinity, pH~~ **and oxygen level**). NL (Comments): Should be in line with 3.2 of annex II. PT (Comments): It is important that the transporter knows the salinity level and water parameters of the tanks at the farms of origin and destination of the animals. RO

Pcy Text	Drafting suggestions and Comments
	(Comments): If fish are to be unloaded in different water parameters/quality, the operator should change the water in the containers/tanks [sea paragraph 3.1] with rearing water several times until fish are acclimatized to the rearing water condition. SE (Drafting suggestions): 7.3. Operators shall ~~consider~~ **allow** enough time for acclimatisation of some species depending on their needs and before being unloaded into water of a significantly different quality (such as temperature, salinity, pH)
7.4. Operators shall remove moribund or seriously injured aquatic animals and kill them using an appropriate method suitable for the species and size of the animal and preventing unnecessary suffering.	AT (Comments): Any dead or dying fish shall be removed as soon as possible in a way that does not adversely affect the welfare of those remaining. DE (Drafting suggestions): 7.4. ~~Operators~~ **Keepers** shall**, where possible,** remove moribund or seriously injured aquatic animals and kill them using an appropriate method suitable for the species and size of the animal and preventing unnecessary suffering. DE (Comments): In our view this should be the resonsiblity of the keepers as they are in directly involved in animal handling. The wording of the obligation is too narrow and may not be feasible in all cases in practice and would therefore possibly be disproportionate in some situations (large amount of fish in giant

Pcy Text	Drafting suggestions and Comments
	containers). So far, a provision for training of the keepers in the methods of killing is missing in the text. FI (Comments): In practice, this is very challenging , because it can be impossible to detect individual animals at the time of unloading. FR (Comments): Cette opération devrait également s'effectuer en cours de transport et non uniquement au déchargement (cf point 6.5) FR (Comments): This operation should also take place during transport and not only at unloading (see point 6.5). HU (Comments): see above. There is no legal requirements in relation of the killing metods of aquatic animals IT (Drafting suggestions): ~~7.4. Operators shall remove moribund or seriously injured aquatic animals and kill them using an appropriate method suitable for the species and size of the animal and preventing unnecessary suffering.~~ IT (Comments):

Pcy Text	Drafting suggestions and Comments
	Removing of injuried or muribond animals is an operation to be carried out at the place of destination because unloading procedures (as loading procedures) are normally carried out using water pipes linked to water pumps PT (Comments): See comment on which methods of termination to use
8. Post transport practices	IT (Comments): Post transports practices should not be too much detailed for the purposes of the regulation, except for point 8.3 related to retrospective checks LV (Comments): This regulation is setting requirenments for transport of animals. The practices after transport is not included in this regulation for other species.
8.1. The operator in charge of receiving the aquatic animals shall closely observe them during the post-transport period and keep appropriate records.	AT (Comments): It should be clarified in what form the records are to be kept. CZ (Comments): The records need to be specified. Will they really be for every shipment? Retailers receive a lot of incoming shipments, which are often subsequently resold to other MS. DE (Drafting suggestions):

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Pcy Text	Drafting suggestions and Comments
	8.1. The operator in charge of receiving the aquatic animals shall **ensure that the animals are** closely observe**d** ~~them~~ during the post-transport period **of 24 hours** and keep appropriate records. DE (Comments): The oberservation of the animals should be performed by adequately trained persons, which may not necessarily be the operator. It is unclear how long the post-transport period should last. We suggest to introduce a minimum time span of 24 hours but leave this open for discussion. FI (Comments): for how long? what are the appropriate records? GR (Comments): Is this feasible? Duration should be defined (e.g. for 5 days or a week following unloading to the new installations. It is also needed to define what to "observe" (it can be only mortality or can include behavioural indicators too). HR (Drafting suggestions): ~~The operator in charge of receiving the aquatic animals shall closely observe them during the post-transport period and keep appropriate records~~ IT (Drafting suggestions): ~~**8.1. The operator in charge of receiving the aquatic animals shall closely observe them during the post-transport period and keep appropriate records.**~~

Pcy Text	Drafting suggestions and Comments
	LV (Drafting suggestions): ~~**8.1. The operator in charge of receiving the aquatic animals shall closely observe them during the post-transport period and keep appropriate records.**~~ LV (Comments): ~~Is this feasible? Duration should be defined (e.g. for 5 days or a week following unloading to the new installations. It is also needed to define what to "observe" (it can be only mortality or can include behavioural indicators too).~~ PT (Comments): How long should this post-transport period last? We propose that it be set at 48-72 hours. What kind of records? Water quality parameters; salinity; mortality and injured animals/injuries? RO (Comments): Is this feasible? Duration should be defined (e.g. for 5 days or a week following unloading to the new installations. It is also needed to define what to "observe" (it can be only mortality or can include behavioral indicators too). SE (Comments): For how long shall the animals be observed? What are the appropriate records?

Pcy Text	Drafting suggestions and Comments
8.2. Aquatic animals showing abnormal clinical signs shall either be isolated and examined by a veterinarian, who may recommend treatment, or killed using a method suitable for the species and size of the animal and preventing unnecessary suffering.	DE (Drafting suggestions): 8.2. Aquatic animals showing ~~abnormal~~ clinical signs **of disease, significant injuries or abnormal behaviour within the post-transport period under 8.1** shall**, where possible,** either be isolated and examined by a veterinarian, who may recommend treatment, or killed using a method suitable for the species and size of the animal and preventing unnecessary suffering. DE (Comments): The term 'abnormal clincal signs' should be specified by using the wording under 4.2(a) and (b). It is unclear to us, for how long this provision can still be within the scope of this regulation. We also suggest to include a time span. Furthermore this provision could not be feasible in some situations (large amount of fish in giant containers) and therefore suggest to include 'where possible'. IT (Drafting suggestions): ~~**8.2. Aquatic animals showing abnormal clinical signs shall either be isolated and examined by a veterinarian, who may recommend treatment, or killed using a method suitable for the species and size of the animal and preventing unnecessary suffering.**~~ LV (Drafting suggestions): ~~**8.2. Aquatic animals showing abnormal clinical signs shall either be isolated and examined by a veterinarian, who may recommend treatment, or killed using a method suitable for the species and size of the animal and preventing unnecessary suffering.**~~

Pcy Text	Drafting suggestions and Comments
	PL (Drafting suggestions): ~~8.2. Aquatic animals showing abnormal clinical signs shall either be isolated and examined by a veterinarian, who may recommend treatment, or killed using a method suitable for the species and size of the animal and preventing unnecessary suffering.~~ PL (Comments): This does not conern transport, so the point should be deleted from the regulation. Also, please advise in what kind of situations veterinary treatment of individual aquatic animals is performed, as we do not know of such situations.
8.3. Operators shall evaluate significant problems associated with transport and take mitigation measures to prevent recurrence.	DE (Drafting suggestions): 8.3. Operators**, keepers, organisers, transporters and attendants** shall evaluate significant problems associated with transport and take mitigation measures to prevent recurrence. DE (Comments): We are of the opinon that everyone involved (at any stage of the transport) should question and constantly optimise the applied transport practices. FI (Comments): What are these significant problems? Why not evaluate mortality and/ or injuries? Recording he amount of mortality or injured would be necessary to follow this and can be part of self monitoring which can be assessed during OC.

Pcy Text	Drafting suggestions and Comments
	FR (Drafting suggestions): 8.3. Operators shall evaluate **and record** significant problems associated with transport and ~~take~~ **implement written** mitigation measures to prevent recurrence. FR (Comments): Sans enregistrement et mesures correctives écrites, ce point ne peut pas faire l'objet de contrôles officiels FR (Drafting suggestions): 8.3. Operators shall evaluate **and record** significant problems associated with transport and ~~take~~ **written** mitigation measures to prevent recurrence. FR (Comments): Without written registration and corrective actions, this item cannot be controlled. GR (Comments): In Greece, land vehicles carrying containers for fish transportation equipped with oxygen cylinders are not allowed to enter ships or ferries. This makes it difficult to transport fish to fish farms on the islands. LV (Drafting suggestions): ~~**8.3. Operators shall evaluate significant problems associated with transport and take mitigation measures to prevent recurrence.**~~

Pcy Text	Drafting suggestions and Comments
	LV (Comments): ~~In Greece, land vehicles carrying containers for fish transportation equipped with oxygen cylinders are not allowed to enter ships or ferries. This makes it difficult to transport fish to fish farms on the islands.~~ PT (Comments): How will this be done? Shouldn't there be a notification to the authorities so that action can be taken against the transport company? RO (Comments): Land vehicles carrying containers for fish transportation equipped with oxygen cylinders are not allowed to enter ships or ferries. This makes it difficult to transport fish to fish farms on the islands. SE (Comments): This can be a daunting task depending on what constitutes significant problems. Why not evaluate mortality and/ or injuries?