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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Animals and Veterinary Questions (Animal Welfare)
N° Cion doc.:	16405/23 + ADD 1
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 - Questions to delegations on Chapter VI - FR replies

Delegations will find in annex replies from France together a courtesy copy into English on the Presidency questions in relation to Chapter VI of the above proposal, as set out in document WK 16021/24 INIT.

WK 16021/2024 ADD 10

LIMITE

Questions about Chapter VI of proposal and Chapter V of Annex I

The answers to these questions demonstrating positions of Member States will guide the Polish Presidency when drafting the Presidency text.

Please answer by ticking one box per question. In the last question (nr 14) which includes brackets [_], please insert a number. If you feel it is necessary, you are also welcome to include a short justification of your answer in the optional justification space below each question.

No	Question	Reference to text
1	<p>What should be the maximum duration of a long journey, after which the terrestrial animals shall reach the place of destination?</p> <p>The COM proposal is divided in two parts: 21 hours + 24 h rest + 21 hours.</p> <p>A <input type="checkbox"/> It should be shorter.</p> <p>B <input type="checkbox"/> It should stay as in the proposal.</p> <p>C <input checked="" type="checkbox"/> It should be longer.</p> <p><i>(Optional) justification:</i></p> <p>A partir du moment où de bonnes conditions de transport sont réunies (alimentation, abreuvement, périodes de repos) et contrôlées (planification, formation et contrôles officiels, y compris a posteriori), les temps de transports pourraient être plus longs afin de prendre en compte le caractère essentiel du transport des animaux pour le bon fonctionnement du marché intérieur et la pérennité des filières.</p>	Chapter VI Art. 27
2	<p>Would you agree to group requirements concerning journey times for poultry and rabbits (currently in Annex I) and for other animals (currently in Chapter VI of the Regulation) in one place?</p> <p>A <input type="checkbox"/> No, the requirements should stay in different parts of text as in the Commission proposal.</p> <p>B <input checked="" type="checkbox"/> Yes, the requirements should be grouped. Where do you prefer to move all of them:</p> <p style="padding-left: 40px;"><input type="checkbox"/> to Chapter VI of the Regulation, or <input checked="" type="checkbox"/> to Annex I.</p> <p><i>(Optional) justification:</i></p> <p>L'idée serait de grouper ensemble les exigences principales dans le corps du texte et les spécifications techniques par espèces dans l'annexe I par soucis de lisibilité pour les opérateurs et les autorités compétentes.</p>	Chapter VI Art. 27 and Chapter V of Annex I
3	<p>Do you agree that transport of animals <u>other than</u> poultry and rabbits to a slaughterhouse shall only be conducted by means of short journeys (i.e. 9 hours)?</p>	Chapter VI Art. 28

	<p>A <input type="checkbox"/> Yes, it should be possible only in short journeys.</p> <p>B <input checked="" type="checkbox"/> No, the journey time to a slaughterhouse should be allowed to be longer than 9 h.</p> <p>(Optional) justification: A partir du moment où de bonnes conditions de transport sont réunies (alimentation, abreuvement, périodes de repos) et contrôlées (planification, formation et contrôles officiels, y compris a posteriori), les temps de transports pourraient être plus longs. L'organisation des flux d'animaux à destination des abattoirs dépend de multiples facteurs, malgré la dérogation accordée par l'autorité compétente pour l'abattoir le plus proche adapté à l'espèce. En effet, en France et pour garder une rentabilité suffisante, les outils d'abattage se sont concentrés selon les bassins de production agroalimentaire, et le plus souvent spécialisés dans un type d'animaux abattus (espèce, gabarit, réforme ou non, type d'abattage...), ce qui nécessite des structures et un équipement spécifique, ainsi qu'un fonctionnement adapté pour traiter les volumes d'animaux à abattre.</p>	
<p>4</p>	<p>Would you agree to introduce a derogation from certain requirements, such as maximum journey time, for high value breeding animals?</p> <p>A <input checked="" type="checkbox"/> Yes, a derogation for high value breeding animals is necessary.</p> <p>B <input type="checkbox"/> No, such derogation is not necessary.</p> <p>(Optional) justification: Cette question concerne aussi bien l'article 27 que l'article 28. A partir du moment où de bonnes conditions de transport sont réunies (alimentation, abreuvement, périodes de repos) et contrôlées (planification, formation et contrôles officiels, y compris a posteriori), les temps de transports pourraient être plus longs. A destination d'abattage (article 28), le gabarit des animaux reproducteurs nécessite parfois des équipements adaptés : une dérogation au transport des reproducteurs (reproducteurs porcins notamment) vers des sites d'abattage plus éloignés peut être nécessaire. A destination d'élevage, le transport des animaux à haute valeur génétique répond aux besoins de pays partenaires, parfois éloignés, qui cherchent à renouveler leur cheptel. Sous réserve de bonnes conditions de transport, ces flux doivent être maintenus possibles.</p>	<p>Chapter VI Art. 28 and art.27</p>
<p>5</p>	<p>Regardless of the type of the means of transport, what should be the maximum journey time for unweaned animals?</p>	<p>Chapter VI</p>

	<p>The COM proposal is: 8 hours or 9+9 hours in case of using a feeding system.</p> <p>A <input type="checkbox"/> The journey time should be shorter.</p> <p>B <input type="checkbox"/> The journey time should stay as indicated in the proposal.</p> <p>C <input checked="" type="checkbox"/> The journey time should be longer.</p>	Art. 29
	<p><i>(Optional) justification:</i></p> <p>A partir du moment où de bonnes conditions de transport sont réunies (alimentation, abreuvement, périodes de repos) et contrôlées (planification, formation et contrôles officiels, y compris a posteriori), les temps de transports pourraient être plus longs.</p> <p>Les ateliers d'engraissement des ruminants de la filière laitière sont aujourd'hui éloignés des ateliers laitiers (surtout en filière bovine).</p>	
6	<p>Would you consider to include journey at sea (livestock vessels and ro-ro) as a part of the journey time?</p> <p>A <input type="checkbox"/> Yes</p> <p>B <input type="checkbox"/> No</p> <p>C <input type="checkbox"/> Sea transport within the country or UE should be excluded from the journey time.</p>	Chapter VI Art. 30
	<p><i>(Optional) justification:</i></p> <p>Cette question importante nécessite encore des réflexions et des échanges.</p>	
7	<p>Would you agree to introduce an exemption from the requirements caused by unfavorable weather forecast for means of transport with controlled temperature inside?</p> <p>A <input checked="" type="checkbox"/> Yes, in case of controllable conditions inside the means of transport, the weather forecast shall be irrelevant (i.e. hot weather limitations should not be relevant for airconditioned means of transport and cold weather limitations should not be relevant for heated means of transport).</p> <p>B <input checked="" type="checkbox"/> No, the weather forecast must be taken into account even in case of journeys in means of transport with controlled temperature conditions.</p>	Chapter VI Art. 31
	<p><i>(Optional) justification:</i></p> <p>Les deux réponses sont possibles si on considère qu'elles sont complémentaires : les prévisions de température en amont et la possibilité d'avoir des températures dirigées (et contrôlables) dans les compartiments sont importantes.</p>	

	<p>D'une part, les prévisions de température extérieures sont utiles pour l'anticipation des voyages dans de bonnes conditions (prévision de transport selon des horaires adaptés, ou choix d'équipements adaptés pour la climatisation ou le chauffage si besoin).</p> <p>D'autre part, pour le bien-être animal, seules les températures réellement subies par les animaux à l'intérieur des compartiments indiquent les conditions de confort en cours de transport.</p> <p>Dans certaines productions, les températures dirigées sont constantes et nécessaires quel que soient les prévisions de température : livraison des poussins par exemple, ce qui leur permet de livrer quel que soit les prévisions.</p>	
8	<p>Do you believe that the weather forecast as predicted by a designated body in each MS should be the basis of planning the journeys?</p> <p>A <input type="checkbox"/> Yes, that the weather forecast should be taken into account during planning of long journeys only.</p> <p>B <input checked="" type="checkbox"/> Yes, the weather forecast should be taken into account when planning both long and short journeys.</p> <p>C <input checked="" type="checkbox"/> No, the weather forecast should not be taken into account, attention must be paid to temperature sensors within the animal compartment on the means of transport, as required in Chapter V.</p> <p><i>(Optional) justification:</i> Cf réponse à la question 7 : Les deux réponses sont possibles, les prévisions de température en amont et la possibilité d'avoir des températures dirigées (et contrôlables) dans les compartiments sont importantes.</p> <p>D'une part, les prévisions de température extérieures sont utiles pour l'anticipation des voyages dans de bonnes conditions (prévision de transport selon des horaires adaptés, ou choix d'équipements adaptés pour la climatisation ou le chauffage si besoin).</p> <p>D'autre part, seules les températures réellement subies par les animaux à l'intérieur des compartiments indiquent les conditions de confort en cours de transport. Pour les voyages de longue durée, les températures prévisionnelles seraient à prendre en compte pour anticiper le voyage ; et l'obligation de résultat sera objectivée par les capteurs de température.</p>	Chapter VI Art. 31
9	<p>Would you agree to introduce a derogation from the necessity of feeding the animals during transport to a slaughterhouse, for hygienic reasons concerning carcass processing?</p> <p>A <input checked="" type="checkbox"/> Yes, in case of short journeys to a slaughterhouse the animals should not have to be fed.</p> <p>B <input checked="" type="checkbox"/> No, the animals should be fed during the journey to a slaughterhouse in case of long journeys.</p> <p><i>(Optional) justification:</i> Tout dépend de la durée de voyage.</p>	Chapter V of Annex I Point 1.1, 1.2 and 2.1

	<p>Si le voyage vers l'abattoir est de courte durée (< 9h), alors l'alimentation n'est pas obligatoire (le paillage pour les ruminants reste obligatoire).</p> <p>Si on considère le cas des voyages de longue durée à destination de l'abattoir, les animaux doivent être alimentés.</p> <p>Une durée maximale entre le retrait de l'aliment et l'abattage devrait alors être définie.</p>	
10	<p>What should be the maximum journey time for poultry, including for slaughter?</p> <p>The COM proposal is: 12 hours including loading and unloading.</p> <p>A <input type="checkbox"/> The journey time should be shorter.</p> <p>B <input checked="" type="checkbox"/> The journey time should stay as proposed by COM if loading/unloading excluded from the journey time.</p> <p>C <input checked="" type="checkbox"/> The journey time should be longer.</p> <p><i>(Optional) justification:</i></p> <p>A partir du moment où de bonnes conditions de transport sont réunies (alimentation, abreuvement, périodes de repos) et contrôlées (planification, formation et contrôles officiels, y compris a posteriori), les temps de transports pourraient être plus longs.</p> <p>La difficulté est d'intégrer le temps de chargement/déchargement dans le temps de transport pour tous les types de production (certaines régions à contraintes géographiques particulières, éloignées des centres d'abattage) : le risque est d'inciter à accélérer ces activités de chargement/déchargement, ce qui pourrait être défavorable aux bonnes conditions de réalisation et donc au détriment du bien-être des animaux.</p>	Chapter V of Annex I Point 2.2 a)
11	<p>How long, in your opinion, shall be the maximum journey time for day-old chicks?</p> <p>The COM proposal is: 24 hours if it is completed within 48 hours after hatching.</p> <p>A <input type="checkbox"/> The journey time should stay as in the proposal.</p> <p>B <input checked="" type="checkbox"/> The journey time should stay as in the current Regulation 1/2005.</p> <p><i>(Optional) justification:</i></p> <p>La définition réglementaire d'un poussin d'un jour est un poussin éclos depuis moins de 72h (Directive 2009/158/CE du 30 novembre 2009) ; elle repose sur l'existence de réserves nutritives et hydriques disponibles dans le vitellus permettant de subvenir aux besoins du poussin durant les premiers jours suivant l'éclosion.</p> <p>Diminuer le temps de voyage dans les 48h suivant l'éclosion entraînerait une perte importante des flux européens à l'export (en faveur des concurrents américains sans restriction), indispensables au maintien des filières avicoles de nombreux pays</p>	Chapter V of Annex I Point 2.2 b)

	dans le monde. Le transport des œufs à couver ne peut pas remplacer ces exports, du fait des équipements et de la technicité importante, nécessaire au métier d'accoupage.	
12	<p>How long, in your opinion, shall be the maximum journey time for end-of-lay hens? The COM proposal is: 10 hours including loading and unloading.</p> <p>A <input type="checkbox"/> The journey time should be shorter. B <input checked="" type="checkbox"/> The journey time should stay as in the proposal if loading/unloading excluded from the journey time. C <input checked="" type="checkbox"/> The journey time should be longer.</p> <p><i>(Optional) justification: cf réponse à la question 10</i> Les animaux de réforme (poules pondeuses et reprod) sont abattus dans des outils spécifiques, peu nombreux à l'échelle européenne, avec des flux commerciaux spécialisés pour améliorer la rentabilité. La difficulté est d'intégrer le temps de chargement/déchargement dans le temps de transport : le risque est d'inciter à accélérer ces activités de chargement/déchargement, ce qui pourrait être défavorable aux bonnes conditions de réalisation et donc au détriment du bien-être des animaux.</p>	Chapter V of Annex I Point 2.2 d)
13	<p>How long, in your opinion, shall be the maximum journey time for rabbits? The COM proposal is: 24 hours.</p> <p>A <input type="checkbox"/> The journey time should be shorter. B <input type="checkbox"/> The journey time should stay as in the proposal. C <input checked="" type="checkbox"/> The journey time should be longer.</p> <p><i>(Optional) justification:</i> A partir du moment où de bonnes conditions de transport sont réunies (alimentation, abreuvement, périodes de repos) et contrôlées (planification, formation et contrôles officiels, y compris a posteriori), les temps de transports pourraient être plus longs. Les élevages de sélection (reproducteurs à haute valeur génétique) sont peu nombreux et éloignés des bassins d'élevage pour des raisons de biosécurité : une dérogation pour les animaux à haute valeur génétique est nécessaire.</p>	Chapter V of Annex I Point 2.2 c)
14	<p>Do you believe that the feeding intervals for dogs and cats should be the same? The COM proposal is: intervals of not more than 24 hours for dogs and cats.</p> <p>A <input checked="" type="checkbox"/> The feeding interval should stay as in the proposal.</p>	Chapter V of Annex I Point 3.1

	B <input type="checkbox"/> The feeding interval for dogs and cats should be different: dogs: [] hours and cats: [] hours.	
	<i>(Optional)</i> justification: Dans le règlement relatif au bien-être des chiens et des chats, l'alimentation est à minima 2 fois par jour, donc intégrés dans moins de 24h.	

PUBLIC

Questions about Chapter VI of proposal and Chapter V of Annex I

The answers to these questions demonstrating positions of Member States will guide the Polish Presidency when drafting the Presidency text.

Please answer by ticking one box per question. In the last question (nr 14) which includes brackets [_], please insert a number. If you feel it is necessary, you are also welcome to include a short justification of your answer in the optional justification space below each question.

No	Question	Reference to text
1	<p>What should be the maximum duration of a long journey, after which the terrestrial animals shall reach the place of destination?</p> <p>The COM proposal is divided in two parts: 21 hours + 24 h rest + 21 hours.</p> <p>A <input type="checkbox"/> It should be shorter.</p> <p>B <input type="checkbox"/> It should stay as in the proposal.</p> <p>C <input checked="" type="checkbox"/> It should be longer.</p> <p><i>(Optional) justification:</i> Once good transport conditions are met (feeding, watering, rest periods) and controlled (planning, training and official controls, including later), transport times could be longer in order to take account of the essential nature of animal transport for the proper functioning of the internal market and the sustainability of the sectors.</p>	Chapter VI Article 27
2	<p>Would you agree to group requirements concerning journey times for poultry and rabbits (currently in Annex I) and for other animals (currently in Chapter VI of the Regulation) in one place?</p> <p>A <input type="checkbox"/> No, the requirements should stay in different parts of text as in the Commission proposal.</p> <p>B <input checked="" type="checkbox"/> Yes, the requirements should be grouped. Where do you prefer to move all of them: <input type="checkbox"/> to Chapter VI of the Regulation, or X to Annex I.</p> <p><i>(Optional) justification:</i> The idea would be to group together the main requirements in the body of the text and the technical specifications by species in Annex I for the sake of readability for operators and competent authorities.</p>	Chapter VI Article 27 and Chapter V of Annex I
3	<p>Do you agree that transport of animals <u>other than</u> poultry and rabbits to a slaughterhouse shall only be conducted by means of short journeys (i.e. 9 hours)?</p> <p>A <input type="checkbox"/> Yes, it should be possible only in short journeys.</p>	Chapter VI Article 28

	<p>B <input checked="" type="checkbox"/> No, the journey time to a slaughterhouse should be allowed to be longer than 9 h.</p> <p>(Optional) justification: Once good transport conditions are met (feeding, watering, rest periods) and controlled (planning, training and official controls, including later), transport times could be longer. The organisation of animal flows to slaughterhouses depends on multiple factors, despite the derogation granted by the competent authority for the nearest slaughterhouse suitable for the species. Indeed, in France and in order to maintain sufficient profitability, slaughter tools have been concentrated according to the agro-food production basins, and most often specialised in a type of slaughtered animals (species, size, reform or not, type of slaughter, etc.), which requires specific structures and equipment, as well as suitable operation to handle the volumes of animals to be slaughtered.</p>	
<p>4</p>	<p>Would you agree to introduce a derogation from certain requirements, such as maximum journey time, for high value breeding animals?</p> <p>A <input checked="" type="checkbox"/> Yes, a derogation for high value breeding animals is necessary.</p> <p>B <input type="checkbox"/> No, such derogation is not necessary.</p> <p>(Optional) justification: This question concerns both Article 27 and Article 28. Once good transport conditions are met (feeding, watering, rest periods) and controlled (planning, training and official controls, including later), transport times could be longer. For slaughter (Article 28), the size of breeding animals sometimes requires suitable equipment: a derogation from the transport of breeding animals (e.g. pig breeders) to more distant slaughter sites may be necessary. For breeding purposes, the transport of animals of high genetic value meets the needs of partner countries, sometimes far away, seeking to renew their livestock. Subject to good transport conditions, these flows must be kept possible.</p>	<p>Chapter VI Art. 28 and Art.27</p>
<p>5</p>	<p>Regardless of the type of the means of transport, what should be the maximum journey time for unweaned animals? The COM proposal is: 8 hours or 9+9 hours in case of using a feeding system.</p> <p>A <input type="checkbox"/> The journey time should be shorter.</p> <p>B <input type="checkbox"/> The journey time should stay as indicated in the proposal.</p> <p>C <input checked="" type="checkbox"/> The journey time should be longer.</p> <p>(Optional) justification:</p>	<p>Chapter VI Article 29</p>

	<p>Once good transport conditions are met (feeding, watering, rest periods) and controlled (planning, training and official controls, including later), transport times could be longer.</p> <p>Dairy ruminant fattening plants are now far from dairy plants (especially in the beef sector).</p>	
6	<p>Would you consider to include journey at sea (livestock vessels and ro-ro) as a part of the journey time?</p> <p>A <input type="checkbox"/> Yes</p> <p>B <input type="checkbox"/> No</p> <p>C <input type="checkbox"/> Sea transport within the country or EU should be excluded from the journey time.</p> <p>(Optional) justification: This important issue still requires reflection and discussion.</p>	Chapter VI Article 30
7	<p>Would you agree to introduce an exemption from the requirements caused by unfavorable weather forecast for means of transport with controlled temperature inside?</p> <p>A <input checked="" type="checkbox"/> Yes, in case of controllable conditions inside the means of transport, the weather forecast shall be irrelevant (i.e. hot weather limitations should not be relevant for airconditioned means of transport and cold weather limitations should not be relevant for heated means of transport).</p> <p>B <input checked="" type="checkbox"/> No, the weather forecast must be taken into account even in case of journeys in means of transport with controlled temperature conditions.</p> <p>(Optional) justification: Both answers are possible if they are considered complementary: Upstream temperature forecasts and the possibility of having directed (and controllable) temperatures in the compartments are important. On the one hand, external temperature forecasts are useful for the anticipation of trips in good conditions (transport forecast according to adapted schedules, or choice of suitable equipment for air conditioning or heating if necessary). On the other hand, for animal welfare, only the temperatures actually experienced by the animals inside the compartments indicate the conditions of comfort during transport. In some productions, the directed temperatures are constant and necessary regardless of the temperature forecasts: delivery of chicks for example, which allows them to deliver whatever the forecasts.</p>	Chapter VI Article 31
8	<p>Do you believe that the weather forecast as predicted by a designated body in each MS should be the basis of planning the journeys?</p> <p>A <input type="checkbox"/> Yes, that the weather forecast should be taken into account during planning of long journeys only.</p>	Chapter VI Article 31

	<p>B <input checked="" type="checkbox"/> Yes, the weather forecast should be taken into account when planning both long and short journeys.</p> <p>C <input checked="" type="checkbox"/> No, the weather forecast should not be taken into account, attention must be paid to temperature sensors within the animal compartment on the means of transport, as required in Chapter V.</p>	
	<p><i>(Optional) justification:</i></p> <p>See answer to question 7: Both responses are possible, upstream temperature forecasts and the possibility of having directed (and controllable) temperatures in the compartments are important.</p> <p>On the one hand, external temperature forecasts are useful for the anticipation of trips in good conditions (transport forecast according to adapted schedules, or choice of suitable equipment for air conditioning or heating if necessary).</p> <p>On the other hand, only the temperatures actually experienced by the animals inside the compartments indicate the conditions of comfort during transport. For long journeys, forecast temperatures should be taken into account in order to anticipate the journey; and the obligation of result will be objectified by the temperature sensors.</p>	
<p>9</p>	<p>Would you agree to introduce a derogation from the necessity of feeding the animals during transport to a slaughterhouse, for hygienic reasons concerning carcass processing?</p> <p>Yes, in case of short journeys to a slaughterhouse the animals should not have to be fed.</p> <p>B <input checked="" type="checkbox"/> No, the animals should be fed during the journey to a slaughterhouse in case of long journeys.</p>	<p>Chapter V of Annex I Items 1.1, 1.2 and 2.1</p>
	<p><i>(Optional) justification:</i></p> <p>It all depends on the length of the trip.</p> <p>If the journey to the slaughterhouse is short (< 9h), then feeding is not mandatory (mulching for ruminants remains mandatory).</p> <p>In the case of long journeys to the slaughterhouse, the animals must be fed.</p> <p>A maximum time between withdrawal of the feed and slaughter should then be defined.</p>	
<p>10</p>	<p>What should be the maximum journey time for poultry, including for slaughter?</p> <p>The COM proposal is: 12 hours including loading and unloading.</p> <p>A <input type="checkbox"/> The journey time should be shorter.</p> <p>B <input checked="" type="checkbox"/> The journey time should stay as proposed by COM if loading/unloading excluded from the journey time.</p> <p>C <input checked="" type="checkbox"/> The journey time should be longer.</p>	<p>Chapter V of Annex I Point 2.2(a)</p>
	<p><i>(Optional) justification:</i></p>	

	<p>Once good transport conditions are met (feeding, watering, rest periods) and controlled (planning, training and official controls, including later), transport times could be longer.</p> <p>The difficulty is to integrate loading/unloading time into transport time for all types of production (certain regions with special geographical constraints, far from slaughter centres): the risk is to encourage these loading/unloading activities to be speeded up, which could be detrimental to the good conditions of implementation and thus to the welfare of the animals.</p>	
11	<p>How long, in your opinion, shall be the maximum journey time for day-old chicks?</p> <p>The COM proposal is: 24 hours if it is completed within 48 hours after hatching.</p> <p>A <input type="checkbox"/> The journey time should stay as in the proposal.</p> <p>B <input checked="" type="checkbox"/> The journey time should stay as in the current Regulation 1/2005.</p> <p><i>(Optional) justification:</i></p> <p>The regulatory definition of a day-old chick is a chick hatched less than 72 hours ago (Directive 2009/158/EC of 30 November 2009); it is based on the availability of sufficient nutrients and water in the yolk to support the chick during the first days after hatching.</p> <p>Reducing travel time within 48 hours of hatching would lead to a significant loss of European export flows (to the benefit of unrestricted US competitors), which are essential to maintaining the poultry sectors of many countries around the world. The transport of hatching eggs cannot replace these exports, because of the equipment and the high level of technical know-how required for the hatching trade.</p>	Chapter V of Annex I Point 2.2(b)
12	<p>How long, in your opinion, shall be the maximum journey time for end-of-lay hens?</p> <p>The COM proposal is: 10 hours including loading and unloading.</p> <p>A <input type="checkbox"/> The journey time should be shorter.</p> <p>B <input checked="" type="checkbox"/> The journey time should stay as in the proposal if loading/unloading excluded from the journey time.</p> <p>C <input checked="" type="checkbox"/> The journey time should be longer.</p> <p><i>(Optional) justification:</i> cf. answer to question 10</p> <p>Reform animals (laying hens and repros) are slaughtered in specific tools, few in number at European level, with specialised trade flows to improve profitability.</p>	Chapter V of Annex I Point 2.2(d)

	The difficulty is to integrate loading/unloading time into transport time: the risk is to encourage these loading/unloading activities to be speeded up, which could be detrimental to the good conditions of implementation and thus to the welfare of the animals.	
13	<p>How long, in your opinion, shall be the maximum journey time for rabbits? The COM proposal is: 24 hours.</p> <p>A <input type="checkbox"/> The journey time should be shorter. B <input type="checkbox"/> The journey time should stay as in the proposal. C <input checked="" type="checkbox"/> The journey time should be longer.</p> <p><i>(Optional) justification:</i> Once good transport conditions are met (feeding, watering, rest periods) and controlled (planning, training and official controls, including later), transport times could be longer. Breeding farms (breeders of high genetic value) are few and far from breeding areas for biosecurity reasons: a derogation for animals of high genetic value is necessary.</p>	Chapter V of Annex I Item 2.2 (c)
14	<p>Do you believe that the feeding intervals for dogs and cats should be the same? The COM proposal is: intervals of not more than 24 hours for dogs and cats.</p> <p>A <input checked="" type="checkbox"/> The feeding interval should stay as in the proposal. B <input type="checkbox"/> The feeding interval for dogs and cats should be different: dogs: [] hours and cats: [] hours.</p> <p><i>(Optional) justification:</i> In the regulation on the welfare of dogs and cats, the feed is at least twice a day, so integrated in less than 24 hours.</p>	Chapter V of Annex I Point 3.1