Council of the European Union
General Secretariat

Interinstitutional files:
2023/0448 (COD)

Brussels, 01 October 2025

WK 9730/2025 ADD 1

LIMITE

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CONTRIBUTION

From: To:	General Secretariat of the Council Working Party on Animals and Veterinary Questions (Animal Welfare)
N° Cion doc.:	16405/23 + ADD 1
Subject:	Protection of animals during transport and related operations - presentation on space allowances - MS comments

Delegations will find in annex delegations comments (AT, BG, CY, CZ, DE, EL, EE, ES, FI, FR, HU, IE, IT, LT, LU, LV, NL, PL, PT, RO, SE, SI, SK) on the Presidency questions concerning space allowances:

1. Do you favour a risk-based approach, with a series of k-values depending on the species?

2. If so, what risk factors should be taken into account?

3. Do you have any other comments regarding space allowances?

	Do you favour a risk-based approach, with a series of k-values depending on the species?	If so, what risk factors should be taken into account?	Do you have any other comments regarding space allowances?
AT	Austria: Yes, we would prefer a risk-based approach. The space allowance must be adapted to the various scenarios depending on the risk.	Austria has identified the following risk factors: · Duration of transport on road transport: Short journeys <9 vs all long journeys Long journeys have a more adverse effect on the welfare of the animals being transported than short ones. In this case, more space should therefore be provided so that the animals have enough place to feed and lie down. · Duration of other type of transport: Road + long ro-ro Road + short ro-ro (ro-ro less than 9 hours) Road + livestock vessel In combined transport, animals often have to be transferred several times. This could cause additional stress for the animals. Here a distinction must be made between whether the animals are transported on a livestock vessel or on a ro-ro ferry. When transported by livestock vessel, the animals are unloaded and then housed in pens on the ship. On Ro-Ro ferries, however, the animals remain on the means of transport for the entire sea voyage. This makes it much more difficult to ensure that the animals are properly cared for. Therefore, the longer the journey, the greater the risk for the welfare of the animals on Ro-Ro ferries. · Type of animals transported: Transport causes additional stress for vulnerable animals, which must be given special protection. These include pregnant animals and unweaned animals. In this case, sufficient space must be provided so that the animals also have room to lie down.	In our opinion, external weather conditions should also be taken into account as factors when calculating the space allowance. To avoid heat stress in warm weather conditions, the space allowance should be adjusted to ensure that all animals have sufficient space for their thermoregulation.

BG	We favour fragmented rules, based on levels of risk associated with the transport of different species.	Risk factors to be taken into account – journey duration, age of animals, behavior and sensitivity of animals during transport, physiological condition of animals, climate and seasonal conditions, means of transport – with or without combination of the different means of transport.	We would like to again underline that drastically expanding the permitted area for animal transport will negatively impact the entire agricultural sector.
CY	We fully support a risk-based approach that includes a range of k-values depending on the species.	The duration of transport should be primarily considered as the main risk factor. Additional risk factors that could be taken into account include thermoregulation (e.g. shorn vs. fleeced sheep) and pregnancy status as already highlighted by the Commission, and potentially the type of transport - for instance, assigning different values for transport by livestock vessels.	Regardless of the risk factors taken into account, the range of k-values should be kept as simple as possible and should not impose an undue burden on operators or competent authorities. In other words, the number of values should not be so extensive that it complicates practical application in the field or the use of the mobile application proposed in Article 53. Ensuring both simplicity and uniformity in the calculation of space allowances is of utmost importance.
CZ	Yes. We support the approach of a series of k-values based on weight and age categories for individual species.	Risks to be taken into account include journey time, temperature (except for vehicles with controlled temperature) and vulnerable animals. The thermoregulatory capacity of individual species must be taken into account. Examples of risk factors in vulnerable animals include pregnancy, age, stage of production, and fleece size.	The current value k is extremely overestimated in some cases. The requirements should not differ significantly from the currently set standards. Space requirements for transport by sea and land should be separate. Space requirements depend not only on the weight and size of the animals, but also on their categories, physical condition, meteorological conditions, and the expected duration of the journey. The use of an allometric equation and the simultaneous use of a single k-value does not seem entirely appropriate when setting spatial requirements for individual species. Each model suffers from a significantly greater error at the extreme ends of the measurement range than in the middle, i.e., in the lowest (e.g., young animals) and highest weight categories (e.g.,

			breeding animals). The use of an allometric equation then makes more sense in relation to individual categories, especially in the case of pigs. In order to avoid errors and extreme calculations of space requirements for certain weight categories (e.g., piglets), it will be necessary to set space requirements that take risk factors into account. This is also mentioned in the EFSA study - Welfare of pigs during transport (page 57): Whether pigs require the space to lie down and rest on a journey is dependent on age of pigs, category of pig, journey duration, condition of the pigs and within vehicle microclimatic conditions. Space requirements should also take into account differences between the transport of different types of poultry (e.g., the significant difference between transporting chickens and geese) and transport using peer systems (in tiers) or in containers. The behavior of animals must also be taken into account when calculating space requirements. During short transport times, e.g. pigs lie down in a sternal position, which provides them with greater stability when the vehicle is in motion. In addition, it is common behavior for piglets weighing up to 30 kg to lie on top of each other regardless of the available space. It should also be noted that more space for animals during transport does not necessarily mean greater welfare. In connection with increasing space, it is also always necessary to assess the issue of animal safety during transport and the possibility of injury to animals during transport.

			Discomfort is mainly caused by movement and changes in the direction and speed of the vehicle. An improperly designed increase in space in the vehicle can further exacerbate these factors. The newly proposed requirements for transport of animals have significant multiple costs, such as fleet expansion, personnel and driver training costs, fuel consumption, and increased emissions.
DE	We are in favour of a series of k-values because although we agree with EFSA's recommendations on k-values that are predicted to meet the important physiological and behavioural needs of animals on long journeys, in particular their ability to simultaneously lie down to rest, thermoregulate and move to reach water and feed, we recognise the need for a more balanced approach for short journeys. In our view, the risk-based deviation from k-values recommended by EFSA should only apply to short journeys. On this type of journey, the welfare of the animals should be maintained in such a way that they are not exposed to the risk of a) not being able to lie down, b) having difficulties to get up, c) losing their balance or d) being trampled and only apply to short journeys. The literature reviewed by EFSA indicates lower k-values at which the above-mentioned risks a) to d) should not occur. These lower k-values may therefore be sufficient to ensure animal welfare on short journeys. Such k-values were reported for pigs (with some uncertainty between 0,019 and 0,021), bovine (with some uncertainty: 0,027) and sheep (0,034). According to EFSA, the k-value for	The risk factor of major importance on road journeys is the length of the journey. Out of simplicity reasons we suggest 2 k-values per species, one applying to short journeys (up to 9 hours, time spent on ro-ro-ferry included) and the other to long journeys (over 9 hours, including livestock vessel and air transport). On long journeys the EFSA recommended k-values according to Chapter VII of Annex I should apply (except for rabbits as the k-value is still too low, please see above under 1.). On short journeys lower k-values which do not pose any animal welfare risks for the respective transport duration (please also refer to above) should apply; however, further risk factors should be taken into account on short journeys by road (including ro-ro): • Outside temperature (above 25 °C) • Unshorn animals (particularly for sheep) • Horned animals • Single animal transport • Pregnant animals In the above cases, the k-values for long journeys should apply.	Limiting the group size is an important parameter to minimize injuries during transport and avoid conflicts over resources such as food and water. Germany has national group size requirements and has made good experiences with this. Space allowances for cats and dogs should also be included in the provisions. National German law uses the height of withers as reference and has minimum vertical and horizontal sizes for containers. The number of animals transported should be limited not only by space but also by the attendant's ability to feed and water the animals. It is frequently reported that feeding animals is not possible on multi-level vehicles. Therefore, the number of decks on road vehicles should be limited for long journeys to ensure that the attendant can adequately feed and water all animals during the rest period of the journey (maximum one for long journeys for adult bovine; maximum two on long journeys for pigs, sheep and goats and unweaned calves). A deviation could apply if the transporter has demonstrated that it is possible to supply the animals with feed on additional decks.

	rabbits of 270 is already the absolute minimum with more space being required on long journeys or at high temperatures. In this regard, national German law could serve as a reference for rabbits on long journeys (e.g. 500 cm² for breeding rabbits of 1 kg body weight, 900 cm² for 3 kg, 1150 cm² for 5 kg).		The mentioned German provisions are accessible under Link to German Law Space Allowance (space allowance and for animals in containers) and Link to German Law Group Size (group size).
EL	We fully support a precise risk-based approach that includes a range of k-values depending on the species which should primarily consider the duration of transport as the main risk factor. The whole process should not pose an excessive burden.	Additional risk factors that could be taken into account include -animal species and category (breeds produced in countries with high temperatures that are more tolerant to them), thermoregulation (e.g. shorn vs. fleeced sheep) and pregnancy status as already highlighted by the Commission, and potentially the type of transport - for instance, assigning different values for transport by livestock vessels. Also distance time and animal type could be other risk factors.	The stocking density for the various species during road transport should be calculated differently compared to livestock vessels. An application should be developed for calculation of space allowance including all legislative requirements. It should be simple as possible and controllable.
EE	Estonia supports a science-based and risk-based approach. In consultation with our agricultural sector, they would choose the different k-values for different species and for different purpose of the journey.	The assumption is that the k-values developed within the framework of version 2 also essentially and realistically considers both the nature of the transport and the specific characteristics of the animals. At the same time, it must be considered that the rules to be established are equally understandable for transporters and that an effective monitoring system is developed. There should be equal playfield for all MS and companies. • In the case of short haul transport, maintain the existing transport volume, avoiding unnecessary cost increases and the increase of the CO2 footprint. • Provides clear incentives for transporters to invest the better transport conditions (ventilation, cooling, watering systems, feeding systems, planned rest areas).	We have several questions what we do hope to get answered: • Are there any statistics showing how many animals died during transport excluding traffic accidents and is that data available? • Is there a plan in place in case it tourns out that animal deaths might be higher in a situation when animals have more space in trucks? Is there a way to reverse the decision? • Is there calculations for economical impact to the companies (both, the transport sector and the owner of the animals)? Our calculations show that in case of choosing either the 1 or 2 option you can transport approximately 30% fever animals at the time compared today's situation. It means higher transport costs which are ultimately passed on the consumer in the price of the product. It also

		• Improves animal welfare risks where risks are higher, especially during long distances, highs temperatures or animals in special conditions. • Allows linking space requirements to objectives risk factors, not just weight-based generalizations. The surface area requirement could depend on the length of the journey.	increases environmental impact which EC trying to reduce in parallel with transport. When we speak about broilers then: • In short journeys there should be easy and flexible space requirement • Calculation that based on live weight and specified k-value is more flexible than a table with large weight ranges. • Birds must be in its natural position, it's more important that they do not feel any cold or high temperatures. • The space allowance must consider the cold and warm seasons. Most EU countries deal with long hot seasons compared to northern countries where has cold winters. • The EFSA recommendation of 460cm2 for a 2kg broiler is 90% of the space required for this broiler in a house where the bird is always and has a free access to water and feed and moves around as it pleases.
ES	Spain supports using the allometric formula (A = k·W^(2/3)) mainly because is easy to implement digitally. However, applying a single k value per species creates imbalances: in pigs, for example, a fixed k=0.027 gives much more space to piglets and fatteners, while sows barely benefit. Some categories are therefore over-dimensioned while others remain insufficiently protected. We can accept to maintain one reference k per species, but to apply correction multipliers depending on the weight category and risk factors (temperature, journey duration, ventilation, etc.).	Spain proposes that the base k be modulated by simple percentage multipliers linked to objective and verifiable conditions, for example: • Weight category (e.g. piglets, growers, fatteners, sows in pigs; light vs heavy cattle; rabbits for fattening vs for breeding; broilers vs heavy poultry). • Temperature and humidity (progressive increases of+ 5% or +10%, area above certain thresholds). • Journey duration (additional +5% to +15% area depending on hours travelled or maritime transport). • Ventilation (certified forced ventilation can reduce part of the thermal adjustment).	Spain wishes to underline its concern about the possible consequences for the operability of transport and for the economic sustainability of the sectors of one strong increase of the minimum surface per animal. While improvements for the most vulnerable categories may be justified, the uniform application of new limits could lead to disproportionate reductions in loading capacity, higher logistical costs and an increase in the number of journeys.

		• Physiological state (pregnant animals, weakened animals under exceptional authorisation, other vulnerable animals). • Type of transport (road, livestock vessel..) • Other (open to discusion) In any case, in most of the cases we propose to, finally, arrive to one stocking density similar to the one we've today in the legislation.	
FI	Finland supports the risk-based approach with a series of k-values depending on the species. However, the model has to be understandable and simple and also must recognize variation in transports.	Finland supports the risk-based approach with a series of k-values depending on the species. However, the model has to be understandable and simple and also must recognize variation in transports.	Current space allowances could be acceptable or only minor revisions are needed for short transports. The k-values presented in commission proposal and respective space allowances could be used especially in the longer transports and in the transports where the risk is higher. Minimum vertical height requirements of vehicles should enable two-tiered bovine transports where the height of vehicle is sufficient. The height requirement for equine transports is quite high and only rare equine trailers meet that demand currently.
FR	No, we are favour of defining a single k-factor per species, with a value as close as possible to the densities defined in the current Regulation 1/2005. Only modulations related to sea journeys, to pregnant animals and to fleeced sheep (+/- x %) should be included in the possible corrections. According to Regulation 1/2005, this already corresponds to substantial modulations adapted according to the species: - for example, in the case of bovine animals: modulation by sea represents + 11 to 20% additional space, +10% for pregnant females compared to the space allocated by road.		For France, today with Regulation 1/2005, the density problems observed are mainly related to: - the lack of clarity of the existing regulatory provisions, this point being substantially improved with an allometric formula and the automatic calculation of the densities to be respected; - the non-compliance with existing regulatory provisions (difficulties or lack of controls). To this end, monitoring loading rates (by indicators in particular) and monitoring them, including a posteriori, would make it possible to increase the correct application of regulated densities.

	- for sheep, for road journeys, modulations are more important when comparing the space needed for fleeced sheep (+33 to 50% extra space) or for sheep in advanced gestation (+66 to 100% extra space) compared to shorn sheep. These modulations are nevertheless justified for the necessary ventilation.		
HU	Yes, we can support this approach provided that harmonised and uniform interpretation and implementation are ensured. It is also very important for us that the same criteria are applied to both road and maritime transport.	In our opinion, less is more in this case in order to avoid loopholes, differing interpretations, and increased administrative burdens both for the CAs and for the BOs. We believe the following three risk factors should be considered: • the length of the journey • weather conditions, especially temperature • categories of the animals (weaned, unweaned, vulnerable animals)	We must ensure uniform interpretation. We believe this is only possible through a unified app, operated by the COM, the use of which should be mandatory for both CAs and BOs. We would like to emphasize that while space allowances is an important factor of animal welfare, but other factors (e.g., environmental conditions, driver shortages, etc.) must not be ignored.
IE	Yes.	Factors which could be taken into account in determining k-value include: • Journey length (e.g. 0.027 for cattle if journey <9hours, 0.034 if >9<56h, higher if >56, or similar) • Means of Transport (vessel > truck > plane) • Temperatures forecast on route during planned journey • Horned or unhorned animals • Sheared or unsheared sheep • Vulnerable animals – cull cows, pregnant.	Equidae: • It has been recommended that the allometric equation is not applicable to Equidae in transport [EFSA (2022). Welfare of Equidae during transport]. When horses are transported in individual stalls, space is primarily determined by correct placement of the partitions rather than floor area as such. [Consortium of the Animal Transport Guides Project. (2017) Guide to good practices for the transport of horses destined for slaughter.] The width of the stall should be at least 40 cm more than the width of the animal at its widest point, and at least 40 cm longer than the body length of the horse measured from the tail to the nose with the neck parallel to the ground. If feed in a hay net is provided, an extra 50 cm should be added to the required length of the stall.

			• Unhandled / unbroken horses should be transported in a small group composed of compatible animals free to move around with a density of < 200 kg/m2 [EFSA (2022). Welfare of Equidae during transport].
IT	Italy generally appreciate the proposal, nevertheless with regard to space allowance we would like to maintain the provisions of reg. 1/2005. What works well should not be changed. There is no need to change the rules for calculating the density of animals in transport, since experience shows that it work well with evidence that the welfare of the animals is not harmed. Increasing space allowance should only be considered if it will significantly improve animal welfare. The original EU Commission proposal (2023) in not acceptable for Italian delegation. A risk-based approach on k-values depending on the species, could be acceptable only if this could increase loading density compared to the original Commission proposal, without any added economic burden. Regarding the calculation of loading density by using an app, we generally agree.	• Journey time - to be considered as the main risk factor. • Means of transport (road and sea - assigning different values for transport by livestock vessels) • Temperature • Type of animals (sheared and unsheared, pregnant, unweaned, end-of-life animals, animals with and without horns…)	If a k-value has to be considered to determinate space allowance, this should be different during road transport or sea transport An uniform method (by app) should be preferred to calculate space allowance
LT	Yes, Lithuania supports a risk-based approach, with a series of k-values depending on the species.	We consider the following risk factors as key: • Weight of the animal • Journey time • Journey distance • Animal type (according to age, e.g. veal calves, weaned animals, piglets, pigs, calves, cows, bulls, etc.) • Weather forecast (particularly regarding temperature during the journey).	We do not have any further comments regarding space allowances.

LU	**Luxembourg's Position on the Use of Allometric Equations for Space Allowance in Animal Transport** Luxembourg supports the application of allometric equations to determine space allowance, as proposed by the Commission. This method offers a more precise and scientifically grounded approach to calculating the required surface area for different species, compared to the current provisions in existing regulations. However, we share the concerns expressed by several Member States regarding the proposed K-value. If implemented as currently suggested, it would significantly reduce the number of animals that can be transported per vehicle, leading to a substantial and unnecessary increase in transport-related costs. Luxembourg wishes to specifically comment on the K-value in relation to cattle and pig transport, as these are the most relevant species for our country. Given Luxembourg's small size and its active participation in intra-EU trade, this issue is of particular importance. Between October 2021 and 8 September 2025, Luxembourg validated a total of 9,899 transport certificates for the movement of 160,201 cattle and 173,471 pigs to other Member States. The vast majority of these transports were short-distance journeys (2 hours). Only 625 transports (6.31%) qualified as long-distance journeys (>8 hours). Of the 9,899 certificates, only 7 (0.07%) received an unfavorable animal welfare assessment in TRACES, with just one long-distance journey (0.16%) flagged negatively. These figures demonstrate that operators in		

	Luxembourg adhere to high standards and that the risk to animal welfare is minimal. Contrary to the Commission's position, Luxembourg does not consider all animals transported to slaughterhouses as vulnerable. Due to the near absence of piglet production in Luxembourg, the pigs transported to slaughterhouses are predominantly healthy animals from fattening establishments. Vulnerable animals (cattle as well as pigs), such as those at the end of their productive life, are always transported to the nearest slaughterhouses—typically within one or two hours—at reduced loading densities (e.g., single transport on straw for slightly lame animals). Luxembourg advocates for a **risk-based approach** to determining space allowance. We propose starting with a general K-value lower than the one currently recommended by EFSA, with adjustments based on specific risk factors. These factors could include: • Transport distance • Temperature forecasts along the route • Presence of unweaned animals • Presence of end-of-career animals • Presence of animals with minor pathologies (where animals are still fit for transport) • Specific species characteristics (e.g., fleeced sheep) **Conclusion:** The allometric equation is a valuable tool for calculating space allowance based on animal weight. However, the K-values must be adapted to allow for higher loading		

	densities, particularly in cases where the risk to animal welfare is demonstrably low. Luxembourg is in favor of the approach to fragment the rules based on levels of risk associated with the transport of different species In light of our ongoing efforts to optimize space utilization while maintaining animal welfare standards, we propose the following examples of adjustments to the current proposal for space allowances: • **Pigs (125 kg):** Current proposal: **0.68 m² per pig Proposed adjustment: 0.55 m² per pig** • **Cattle (650 kg):** Current proposal: **2.55 m² per animal Proposed adjustment: 1.75 m² per animal** These revised figures are based on our internal assessments and practical experience, aiming to strike a balance between operational efficiency and acceptable welfare conditions.		
LV	Yes, we are in favor of this. However, the approach should be as simple as possible for a user of the mobile app.	- the journey time - weather conditions, outdoor temperature - the type of the means of transport (road transport (incl. rail transport), roll on – roll off or livestock vessel, air transport) - feed and water should be provided during the journey (yes/no) - horned/non-horned animals - animal species and category - vulnerable animals (pregnant, unweaned and end-of-life animals) - animals transported in containers - sheared/ unsheared animals	We appreciate the uniform approach about the calculation of the space allowance among the Member States.
NL	Yes, we do favour a risk-based approach, taking into account several factors that contribute to the welfare risks the animal will face during	• Species • Age	Animals need space to be able to deal with the effects of transport. They need space to keep themselves upright, they need space to be able

	transport, depending on species, age, category of animals etc.	• Category of animal (end of career animals are at greater risk of experiencing welfare risks like fatigue, injuries and just overall suffering, so they will need more space) • Transport conditions, like: • Temperature (the warmer it is, the more space allowance the animals need to be able to adequately thermoregulate. This is especially important for brachycephalic breeds) • Humidity (the higher the humidity, the more space allowance the animals need to be able to adequately thermoregulate) • Ventilation (animals would need less space for thermoregulation in an air conditioned vehicle in comparison with a mechanically or passively ventilated vehicle) • Duration of the transport (the longer the transport, the more space the animals need to be able to rest properly and to be able to reach the food and drinkers) • Slightly sick or injured animals that are deemed still fit for transport should have more space to be able to deal with the movement of the vehicle	to lay down and rest (depending on transport duration, the species and age of the animals), they need space to thermoregulate, they need space to be able to reach food and drinkers etc. So space allowance has a direct effect on the welfare of the animals. Within the current regulation space allowance is not clearly described (especially not for pigs), making enforcement difficult. So we need very clear rules on space allowance that make it possible for both farmers, transporters and competent authorities to easily calculate the right space allowance. Space allowances for dogs and cats: For cats and dogs we suggest to incorporate the following texts, taken from the recommendations of the Voluntary Initiative group on the welfare of dogs and cats: The animals must be able to stand up fully and hold their head in the natural position, comfortably sit, turn, lie down and rest, and move around in the vehicle/container to access water and feed as appropriate. (Minimum sizes for containers for dogs and cats:) Length: While standing, the dog or cat should be measured from the tip of its nose to the base of the tail. Between 5cm and 12cm should then be added to this (from cats and small dogs to large dogs) to calculate the correct length of container. Height: While standing, the dog or cat should be measured from the tips of the ears (for pointed eared dogs) or the top of the head (for floppy

			eared dogs) and then 12cm should be added to calculate the correct height of the container. Width: While standing, the dog or cat should be measured at its widest point (usually the shoulders). The width of the container should be calculated at 2.5x the animal's width. Since the new regulation will be in effect for probably 20 years or so, it should be future proof. Societal demand for animal welfare is very clear: animals need ample space. Science also clearly indicates that animals need sufficient space to cope well with the effects of transport, as described above. So let's not push the boundaries and not just do the bare minimum for the animals. Of course, the sector must be taken into account, and legislation and regulations must be proportionate, but we also shouldn't be afraid to think differently and shift from the transport of live animals to the transport of germinal products, carcasses and meat. And we should properly protect the animals that still need to be transported by, among other things, giving them sufficient space during transport.
PL	In general PL supports a risk based approach which would allow for a greater flexibility by ensuring that the current practices concerning loading density remain for the most part unchanged.	The risk factors to be taken into account are: the animal species (and in case of aquatic animals their life stage, i.e. fish larvae); the foreseen duration of the journey, e.g. less than 9 h, 9-21 h, above 21 h (instead of a distinction between means of transport); if the transported animals are pregnant;	PL believes that too ambitious provisions concerning the loading density will lead to more fractures in the transported animals and more transmissions from transport without significantly improving the animal welfare especially on short journeys. Hence, PL would like to see development of provisions which do not change significantly the current loading density for the majority of transports, i.e. short journeys. As the duration

		the distinction between shorn and unshorn sheep and between horned and unhorned animals;	of the journeys increases, the density may decrease to reflect the increasing risks of tiredness, dehydration, overheating etc. to better respond to animals needs during journeys that take, for example, multiple days.
PT	Yes, we agree with the establishment of different K values, depending on the species, but also to have in account the weight categories of the animals and the means of transport, guaranteeing an increase in the space allowance, but at the same time not compromising the animal transport.	Other risk factors that can be considered: • Temperatures during the journey, unless the means of transport are equipped to control the temperature inside • The length of the road journeys • Pregnant animals • Vulnerable animals (unweaned and end-of-life) • Shorn and unshorn sheep • Animals with and without horns • Animal species and category (breeds produced in countries with high temperatures), However, regarding these other risk factors and to simplify the calculations, we consider that the space allowance increase should be defined as a percentage, as it is established on the Regulation (EC) 1/2005. This percentual increase should be evaluated and defined by the competent Authority.	In the slide 22 of the presentation, regarding risk levels, we believe that the road + livestock vessels have a different risk than the Road+RO_ro We agree that, on a longer road journey + ro-ro, animals need more space for feeding, watering, and bedding changes, and that density should be defined when the animals are loaded onto the truck, as they will remain inside it during the journey on board the ro-ro. In the case of a journey on a livestock vessel, when the animals arrive at the sea port, they are unloaded from the truck and enter the vessel, where they are maintained in conditions completely different from those, they had inside the truck. They are in larger pens, where access by handlers is much easier. It is easier to feed, water, and change the animals' bedding, as well as to treat and/or separate sick animals, etc. Therefore, we consider that the density of animals inside trucks should be calculated completely independently of the density inside livestock vessels, as this is not an additional risk factor for animal density. In that sense, we propose to consider specific K values for the journey by livestock vessels. We consider that an IT tool (app) that supports the space allowance calculations would be very

			beneficial in order to simplify the compliance of these requirements.
RO	We support a risk-based approach, including the use of K-values, provided that it does not compromise established standards that have proven effective. In particular, the current density thresholds outlined in Regulation (EC) No 1/2005 should remain the fundamental reference point. Any modifications to these benchmarks should only be considered when there is clear evidence that the existing provisions result in a significant and unacceptable deterioration in animal welfare. We are in favour of a precise risk analysis that would not pose an excessive burden. Above all, we endorse a methodology that ensures precision and reliability in its outcomes.	□ length of the journey, □ weather, outdoor temperature, □ the type of the means of transport – vehicle or livestock vessel, □ road and driving conditions, □ need to provide feed and water on the vehicle (ensure animals' ability to reach them), □ thermoregulation (sheared/ unsheared animals), □ horned animals; □ animal species and category (breeds produces in countries with high temperatures), □ vulnerable animals (pregnant, unweaned and end-of-life animals). In general, but also in particular, for vulnerable categories of animals and not only, we advocate a proportionate and context-sensitive approach, especially in the case of short-distance transport.	An app to be used for a uniform calculation of the space allowance among the Member States. However, increasing the space allowance may cause the animals to fall and be injured in case of any sudden movement of the vehicle. The new approach should be grounded in the existing standards (Regulation (EC) No 1/2005), with those benchmarks translated into a clear, metric-based formula suitable for integration into practical applications. This ensures continuity with proven welfare safeguards while enabling consistent, data-driven implementation across transport scenarios.
SE	Yes, SE favour a risk-based approach for calculating space requirements, with the possibility of differentiated k-values based on relevant risk factors. In general, SE is positive about increased space for animal welfare reasons and is in favor to the COM's proposed allometric approach and the use of different k-values for different animal species and for individual animals based on their weight. At the same time, measures also need to be proportionate and cost-effective. There is a great difference between short and long journeys and conditions in different climates and temperatures. It is important that	At least the following factors should be included in the calculation of k-values in a risk-based approach; - Species - Transport time (long/short) - Category of animals (e.g. vulnerable, young, pregnant) - Temperature in the vehicle (above or under UCT) - Type of ventilation in the vehicle - Available vertical height The following factors could also be relevant to consider:	Transport time is one of the most important factors to consider when it comes to space requirements. The COM's proposal for k-values should apply to long transports (over eight hours) and to all transports by vessel for animal transport. Transports less than eight hours and that meet other basic requirements regarding animal category, ventilation and temperatures should be able to have a lower k-value that in principle corresponds to current legislation while maintaining good animal welfare. SE would also like to raise the minimum vertical height as relevant in the discussion on space requirements. As regards **cattle,** the COM's

	the conditions that animals are de facto at risk of being exposed to during transport should form the basis for which requirements should apply. Vulnerable and young animals have a greater need for space and the opportunity to lie down and stand up, among other things. During longer journeys, there is a need for food and water, which all animals must be able to access. The microclimate that the animals are exposed to is greatly influenced by how much heat the animals generate, how hot and humid it is outside the transport, how large the air volume is in the transport and what type of ventilation is used. In addition, the animals' genetics, upbringing environment and origin affect their ability to adapt to different temperatures and thus the need for space during transport.	- Breed/hybrid (e.g. animals that are adapted to, bred in, or accustomed to more extreme climates - Transport experience (Animals used to being transported, e.g. race horses) According to EFSA, several risk factors are important for the need for space during transport. A longer transport time compared to a shorter one should require relatively larger space and a transport that lacks mechanical ventilation or active cooling should also have larger space requirements. It should also be taken into account whether the animals to be transported are vulnerable, e.g. pregnant or young animals. Animals that are used to being transported and that have been handled well in such contexts generally experience a lower level of stress, and could therefore be transported in slightly smaller areas, provided that none of the other risk factors are present. Regarding temperatures, the COM proposes a large range between 0–35 degrees for minimum and maximum temperatures during transport. It would therefore be appropriate to include temperatures that are above or under the temperature zones (UTC) based on EFSA's recommendations for different animal categories/species.	proposed vertical height requirements (H = W x 1.17 + 20 cm) should apply to long transports (over 8 hours) and to transport by animal transport vessel. For short transports of cattle (under 8 hours), minimum vertical height of at least H = W + 20 cm should apply instead. This would enable short transports of cattle in two decks. SE suggest that the COM's proposed minimum vertical height requirements for sheep and goats should also apply to **pigs**, i.e. that the space above the highest point of the tallest animal should be at least 15 cm in vehicles with mechanical ventilation and 30 cm in naturally ventilated vehicles. Regarding the proposed vertical height requirement for **horses**, there is no scientifically proven basis for COM's proposal H = W + 75 cm. SE is of the opinion that H = W x 1,30 should apply instead. This would ensure animal welfare while enabling the transport of horses in vehicles other than large trucks. Having to replace a very large proportion of existing horse trailers would entail significant costs and go against a sustainability perspective.
SI	If the EFSA k-values are retained for basic transport, then we agree that more stringent conditions should be introduced for risk factor animal groups. If the EFSA standards for basic transport are to be lowered due to additional k-values, then only	In case of multiple k-values, the following should be considered: retired/spent animals, sheep in full coat, pregnant animals, long journeys.	We believe that EFSA's k-values most objectively consider the needs of the animals—subjectivity is therefore ruled out. We are concerned that the decisions of the competent authorities could differ within a Member State and also between different Member States if they are taken on the basis of risk-based k-

	one k-value should remain for each animal species.		values. It should be noted that the competent authority with a single k-value for each species is also protected. If we consider introducing risk-based k-values, their set should be as small as possible to reduce deviations in CA decisions.
SK	Yes, this risk-based approach could be favored in the context of animal transport, especially when the approach is supported by science.	Quite wide range of risk factors should be possibly taken into account (for example animal-based: species, age, health status; environmental: external temperature, humidity; transport related: duration of transport, rest/feeding/watering intervals, vehicle design, competence of personnel, handling methods...)	A robust approach should evaluate all relevant factors in a species-specific way. The k-value seems to play a crucial role in stocking density, but it's only one part of the whole process which should be understandable and relatively easy to apply at the end.