

Written questions to Dr Nancy De Briyne - Federation of Veterinarians of Europe (FVE)

*ANIT hearing of
10/12/2020*

No	Questions to FVE
1. (ECR)	Over the years FVE has always called for a transport of meat and carcasses as well as genetic material instead of live animals, and I am referring to the position papers FVE published in 2008, 2016, and 2019. Would you be able to explain <u>why</u> FVE has so strongly called for a replacement of live animal transport?
Answer n1	FVE's position indeed is that animals should be reared as close as possible to the premises on which they are born and slaughtered as close as possible to the point of production, as any movement of farmed animals is inherently stressful (e.g. new environment, mixing unfamiliar animals) and will have a potential impact on their health and welfare (e.g. injuries, death). The longer the journey, the larger the potential negative impact. In addition, transporting animals and mixing animals can facilitate disease transmission and negatively impacts meat quality (e.g. more wounds, bruises, stress induced PSE). Lastly, moving towards shorter supply chains and less transport is beneficial for the environment, as also recognized in the Farm to Fork Strategy. Transport of live animals should be <u>replaced as much as possible by transport of carcasses</u> .
2. Mrs Carmen Avram (S&D)	The European Court of Justice ruled that transport of live animals to non-EU countries should be compliant with the Directive 1/2005 until final destination. Yet, DG SANTE's 2017-2018 reports highlighted there is no EU data regarding the condition of live animals during sea journeys and upon their arrival in non-EU countries. What would FVE suggest in order to fill in this gap of knowledge at the destination and how could European veterinarians be involved during live animal transport, both on sea and on road, in order to provide on the spot species-specific assistance when necessary?
Answer n2	Currently for official veterinarians it is often very difficult to impossible to verify that the whole journey will be compliant with Regulation 1/2005 if the journey ends in countries outside the EU. Official vets often can not verify if the road plan is feasible and if resting places really have the facilities where animals can be unloaded and be taken care of. Some points to improve are checks on the journey planning; inspections during loading and at control posts; improved cross-country collaboration; well-trained personnel, have an EU list of approved resting or supply facilities outside the EU; have a veterinarian on board to take care of the animals during long sea transports where such journeys are unavoidable.

	During the transport on sea also a contingency plan for emergencies like milking, calving, watering of young animals, especially for the case the journey is longer as planned because of bad weather, enough feed and water tanks for the emergency (e.g. harbor cannot be approached because of Corona restrictions). These points are not only important for sea journeys but also for transports via road and other means.
3. Mrs Isabel Carvalhais (S&D)	The FVE has identified the lack of knowledge, awareness and training of the parts involved in animal transport, including veterinarians, as one of the main issues associated with poor animal welfare during transport. What are the areas of education you identify as most critical and in most need of action, namely for veterinarians? To your knowledge, how is the mandatory training set by Regulation 1/2005 being enforced across the EU? Do you know of best practices in Member States that could be shared to improve the quality of training in the EU?
Answer n3	Having good knowledge and being well-trained is important for all involved in the transport of animals (transporters, inspector, veterinarians, handlers, etc.). In the animal transport project we gave trainings in more than 10 countries, which was well appreciated, but this has to be kept up. One of the problems we see now is that the training is not harmonized across countries; in some it is half a day, in others almost a week. In some, once you have done it, there is no need to repeat training, in others you need to go through some training every couple of years. It would be good if MS would harmonise the learning objectives. Fitness of transport is another area where harmonization of training would be beneficial. Another important point is that the hierarchy (e.g. the transport company for their drivers) support and invest in these trainings and in a culture towards animal welfare. However, raising awareness and training alone will not solve our welfare problems during transport.
4. (ID)	Question on zoonoses. Are the veterinarians heard aware of zoonoses, i.e. diseases transmitted from animals to humans, which have been transmitted as a result of the international transport of animals, by land or by sea? Can the experts interviewed inform us about possible quarantine measures and the care given to the animals in the event of a disease found in a transport operation?
Answer n4	Q1: Zoonoses might spread via transport, especially if animals are asymptomatic. Luckily, the EU has strong rules in place to minimise the risk of spreading notifiable diseases, which prove to be working. Most zoonotic diseases spread is suspected to happen via illegal transport (e.g. dogs- rabies). In some cases, asymptomatic animals due to the transport stress could become symptomatic and start spreading disease (e.g. Salmonella). The longer the transport, the higher the risk to transport diseases and vectors with it. Some transport methods which are more difficult to disinfect e.g. sea transports, are riskier than others. It is also important to take into account non-zoonotic diseases as they can also potentially be spread via transport, e.g. African Swine Fever. However, again EU has strong rules in place. Q2: The key is to ensuring no diseased animals are loaded onto the means of transport in the first place. Once the transport is ongoing, it is much more difficult to deal with animals injured or diseased. Ideally transporters should have covered this in their contingency planning, having available a list of veterinary practices, control posts, staging points, assembly centers, other care and supply stations they can contact when something happens. Quarantining the animal during transport will seldom be possible, and also difficult to find a place to quarantine the animal(s). Quarantine at destination is compulsory already for animals coming from countries/zones not free from certain diseases.
5. (ID)	Question on vaccinations. In the case of international transport of animals, can the veterinarians interviewed tell us whether the animals are vaccinated and how veterinary checks can verify these vaccinations?

Answer n5	Some countries indeed require specific vaccination on top of the normal regulations to ensure safe trade of animals. This should be noted in the health certificate or via special certificates. For international transport, often a lot of paperwork is needed to be filled in, which depends on the country of origin, destination and of transit and there disease status. The transporter should make sure that all requirements asked by the importing and transit countries (e.g. requirement of vaccination, payment of import tax, certificate of competence, valid passports, international driving licence, business visa,..) should be in order and as much as possible done in advance, to prevent animals getting stuck at borders.
6. (Greens)	<p>Sanctions</p> <p>The lack of effective, proportionate and dissuasive sanctions has kept the Regulation from being properly implemented. It resulted in recurring violations and a disempowerment of all the actors involved in the transport of animals.</p> <p>What did your organization observe when it comes to sanctions in different member states? What in your view are the failings of the current sanction system? Do you have a state-of-play of the different sanctions levels in each Member states?</p>
Answer n6	Indeed, there is no common sanctioning system and different penalties apply for the same types of non-compliance. Also, the number and extent of controls differs per country. It has been often suggested that a more harmonized sanctioning system could be useful. In addition, improved cross-border collaboration, communication and follow-up on sanctions could improve enforcement. We do not have a complete overview of all the different sanctions in each Member State. This could be something to collect in the meetings of the EC national contact points on animal transport, which meets yearly and which already works on improving cross-country collaboration.
7. (Greens)	<p>Sea transport</p> <p>Sea transport has until recently largely escaped attention of European authorities. The report of DG Health on sea transport clearly states that the checks on the safety and suitability of the vessels are not carried out properly, and that authorizations are given even when deficiencies are noticed. This report shows a global lack of determination at different levels (Commission, Member States, transporters) to properly implement a legislation which is already weak and vague. The checks are not carried out correctly, authorisations are given to substandard vessels which aren't fit for purpose, and the legally responsible person for animal welfare during sea transport is not clearly defined.</p> <p>Would you agree with this assessment, in your experience, or would you have different/further comments? Could you make a state of play of what your organisation has observed in sea transports, considering the main infringements and the reality for animals transported by sea?</p> <p>Is animal welfare being controlled before departure of the vessels? Is animal welfare controlled during the transport itself? Then finally at destination, at the unloading? If, in any of these cases, consistent controls are not occurring - why not? How and with which reasoning/justification are mandatory breaks and maximal transport times disregarded?</p>

Answer n7	<p>This valuable report has been made by Unit F of DG Sante based on a two-year project with several study visits. We agree with the assessments, the conclusions and the recommendations made.</p> <p>Earlier to the publication of this report, we had already started in the subgroup on animal transport under the auspices of the Animal Welfare platform with recommendations on how to improve sea journeys, unfortunately the group was dismantled by the European Commission before we could finish our work.</p> <p>Some main recommendations are 1/ to take weather and temperature into account for the whole sea journey 2/ to make sure sea vessels are suitable and well-equipped to ensure the health and welfare of the animals they will carry for the whole journey 3/ to have robust systems in place to check them before and during loading to make sure no unfit animals are loaded and that all is done correctly. We would also suggest to have an independent veterinarian on board during these long transports to take care of the animals, whom can also report back to the competent authority of origin afterwards. One problem is that the log book is often not continued. Destination harbor is not always the right one, sometimes it is only a harbor where animals are reloaded on trucks for the next transport. It is important to report back after the journey.</p>
8. (Greens)	<p>Vehicles temperatures</p> <p>If we focus on temperature in vehicles, the EU regulation requires capacity to regulate air between 5-30 degrees, but we know that most of vehicles do not have air cooling, and so they technically cannot regulate their temperature. Moreover, the “authorities do not include any restriction regarding temperature in the approval certificate for vehicles” (DG Health overview report on Welfare of Animals exported by road). This ventilation system requirement should be mandatory but does not feature on the vehicle approvals as a prerequisite.</p> <p>How do you explain this gap between what should be and what actually is? What, if any, remedies are currently in place for this?</p>
Answer n8	<p>Transport in temperatures under 5° and over 30° is a big concern e.g. a transport vehicle sitting in the sun immediately becomes very hot. Ventilation systems are either free or forced/automated systems. Free ventilation systems are common in vehicles used for short (less than 8 hours) journeys, whereas forced ventilation systems are a requirement for long journey vehicles. According to the Regulation, the minimum air flow rate of fans should not be lower than 60m³/h per 100 kg live weight and the ventilation system should be capable of operating for more than 4 hours if the vehicle is stationary. It is very important to include this in the approval certificates and to check it routinely. Some species e.g. broilers are especially prone to heat stress. In addition, during summer in some countries it will be often above 30 degrees. In these cases, additional measures should be taken as is already done by many countries e.g. by prohibiting long distance transport during these hot days.</p>
9. (Greens)	<p>Specific species</p> <p>Some species welfare is not covered, or very poorly covered, by 1/2005 Regulation. If we look at fish welfare, the number of farmed fish tremendously outnumbers any other animal farmed for food. Some species, such as carp, tilapia and eel, are even routinely transported by land without water, provoking huge amount of stress and suffering. We also observe bad conditions during transport, such as overcrowding and inadequate water quality, regularly causing irreparable damage to the fish and even death sometimes.</p> <p>What is the situation of fish welfare during transport today? How should the regulation be improved, in order to rectify the situation?</p>

Answer n9	<p>We farm about 30 fish species– with 5 main ones- in the EU, each very different in biological needs re e.g. oxygen, pH and temperature. Main methods of transport are via road, via well-boat and a bit via air. Transportation mostly of young fish (fry, fingerlings,...) and for fish to be slaughtered/to the market. Most important is water quality. Impaired welfare and stress during transport may be caused by many factors including changes in stocking density, handling, water movement and poor water quality. The EC commissioned in 2017 the report 'Welfare of farmed fish' which gives some overview on the situation regarding the welfare during transport of fish. It would be good to have more practical details set including best practices to improve the welfare of fish during transport, but it will have to be done per species seen that their needs are so diverse. Other species such as registered horses, poultry and rabbits should also not forgotten.</p>
------------------	---

No	General questions to all panelists
1. Mr Daniel Buda (EPP)	<p>The Commission plans to revise the animal welfare legislation, including the transport of live animal a part of the Farm 2 Fork strategy in order to ensure the higher level of animal welfare.</p> <p>The Regulation 1/2005 applies to the transport of live animals within the EU and specific checks to those animals imported or exported to and from the EU.</p> <p>Article 1.3 of this regulation allows the Member States to impose additional rules aimed to attain high welfare of animals during transport. In this regard, the Romanian Parliament issued the Law 150/2020 on protection of live animals exported to the third countries, which implies stricter controls and procedures, among them, the presence of a veterinary authority during the entire process of transport on vessels until the destination.</p> <p>What are the most important issues of the current regulation to be revised in order to ensure the welfare of animals during transport and how can the Member States contribute to improve the existing rules? How can the national authorities ensure that the operators are following the rules and procedures during loading and transport of live animals?</p>
Answer n1	<p>The main concerns currently are export of live animals to far away countries often with a lower welfare status; no recognised resting points outside the EU, transport in high temperatures, transport of unweaned calves e.g. young dairy male calves, not enough head space above the animals (to prevent injuries and allow air circulation), specific problems with sea vessels, insufficient controls at loading, too long transport, transport regulation allowing to repeat transport times cycles, loading unfit animals, insufficient feeding, drinking (e.g. unsuitable nipples), flooring and no detailed rules for the transport of some animals (e.g. rabbits, fish) and differences in implementation, enforcement and penalties. These are the points we should address when revising the legislation.</p> <p>Most operators want to follow the rules and transport animals correctly. Sometimes the rules are confusing or conflicting (travelling times/drivers' rules). A limited number of operators do not follow the rules and for them controls and heavy penalties are needed.</p>

<p>2. Mrs Maria Noichl (S&D)</p>	<p>Animals that are declared as breeding animals, and then exported, often end up as animals for slaughter and there is no establishing of a new herd in the destination country, unlike what is stated in advance for exports on the documents. How do you, as experts, assess this situation, where animals are falsely declared and exported under the guise of breeding purposes?</p>
<p>Answer n2</p>	<p>We know this happens, but do not know the extent of it. We also know that sometimes these animals e.g. dairy cows will be used as breeding animals but after some time end up in the slaughterhouse. The same we see with horses, they can be at a certain moment of their life expensive sport horses and at a next stage being transported for slaughter. Since the export subsidies have been reduced, we see more exports of animals for breeding purposes, in some countries to countries who have a questionable climate and infrastructure for these animals to thrive. It is important to realise is that independent of the status of the animal, the needs of the animal are the same.</p>
<p>3. Mrs Maria Noichl (S&D)</p>	<p>Bavaria for example no longer permits live animal transports to certain risk areas. This results in circumvention situations where animals are first exported to a "permitted" destination country and from there on to countries for which no permit would be given at the animal's place of origin. Could you give us your expertise regarding this situation?</p>
<p>Answer n3</p>	<p>This example underlines the need for close EU collaboration between competent authorities. MS Competent Authorities (CA) should put in place adequate procedures ensuring that notifications are provided systematically whenever breaches are detected, that these are acted on and responded to. MS should inform each other if transporters on penalties given to transporters. As indicated before, most transporters want to transport animals correctly but there are always a few who try to circumvent the rules. Training objectives should include court of justice judgments on transports, best practice included type of trucks appropriate for transports of certain types of animals.</p>
<p>4. (Greens)</p>	<p>Animal welfare in transport beyond EU borders Animal welfare outside EU borders is hardly implemented, as stated the 2019 Commission report on animal exports. The absence of agreements with EU neighbouring countries, together with poor retrospective checks and the inability of competent authorities to assess the conditions of transport for the non-EU part of the journey contribute to that concern. Regarding the reality you observed in the field (or in your legal perspective) how are animal welfare requirements applied outside EU? Which alternatives or recommendations are you considering, regarding the difficulties of ensuring animal welfare outside our borders?</p>
<p>Answer n4</p>	<p>This is an issue of great concern within the veterinary profession (see also FVE press release). Official Veterinarians can only sign certificates and approve the loading if they can verify that all the legal requirements (journey length, unloading, watering, feeding, etc.) can be ensured up to the place of destination. This often is extremely difficult and actions should be taken regarding this e.g. by developing an EU database of approved supply and resting places outside the EU (as already exists for the EU). Another open question is if Official Veterinarians can sign the certificates if they know the destination is a place (e.g. a slaughterhouse) where EU regulation and EU standards are not respected. This uncertainty puts Official Veterinarians in a difficult position. In Germany (Colonia, 18 November 2020) the administrative court judgment clarified that certificates should not be signed when continuous non-compliance is known. Overall, we should also always reflect if it is really needed to transport these animals over such a long distance and we should aim to reduce dependency on long-distance transport, as also is recognized in the Farm to Fork strategy. Transport of live animals should be replaced as much as possible by transport of carcasses.</p>

<p>5. (Greens)</p>	<p>Infringement procedures NGOs repeatedly reported breaches of the Regulation 1/2005 in many Member states. However, the Commission did not launch any infringement procedure. In its 2015 audit, Commission however noted the inadequacy of measures taken in the event of non-compliance with European regulations, the only measure taken being the sending of a letter to the transporter, driver, breeder or veterinarian. What reasons has the Commission given to you (if any) for not properly using its enforcement powers when breaches have been repeatedly observed and reported? What is your assessment of their alternative action taken?</p>
<p>Answer n5</p>	<p>We suggest to ask this question to the Commission.</p>