

Written questions to Mr Miguel Angel Higuera

Chair of COPA-COGECA's (Animal health and Welfare Working Party)

Public Hearing on "Recommendations for the future"

QUESTIONS FROM EPP	
QUESTIONS from MEP Daniel BUDA	<p>1. Do you consider that it would be useful to use the financial resources of pillar 2 for developing a transport with high welfare standards?</p> <p>2. Increasing the floor area by reducing the number of animals on the means of transport could be a solution, when temperatures are between 30-35 degrees Celsius?</p>
ANSWERS	<ol style="list-style-type: none"> 1. Copa-Cogeca could accept the existence of a voluntary initiative to apply higher requirements on EU farms that could be linked to the second pillar and compensate for possible derived cost increases and reduced farmers' competitiveness. 2. It would depend on the transport conditions and here we would want to address two issues: <ol style="list-style-type: none"> a. Temperatures: It is necessary to link the outside temperature to the transport conditions and the difference with the inside temperature. The conditions for transportation of live animals within the EU adhere to high animal welfare standards. However, when live animals are transported inside or outside the EU, irrespective of the journey duration, there may be seasonal difficulties with meeting animal welfare conditions, especially during the periods marked by very high temperatures in certain regions inside or outside the EU. Flexible transportation legislation is needed here to provide the necessary measures to deal with temperatures above the average under certain transport conditions. This issue may be resolved by for example providing shady parking spaces for animals in transit at EU and third country borders on the EU side or ensuring that the ventilation systems of the lorries work adequately during the pre-departure inspection. b. Density: The quality of the environment in the vehicles for animal transport is very important for animal welfare, which includes factors like ventilation, temperature, ceiling height, the nature of the floor, space allowance etc. These factors have to be defined and adjusted to the needs of each of the species transported, again based on solid, scientific evidence and background information. Space allowances shall at least comply with the figures laid down, in respect of the animals and the means of transport. Furthermore, the density should be a compromise between the necessary minimum loading density and the maximum

	<p>density allowed by the legislation, taking into consideration the animal species managed in each case. Moreover, we acknowledge that the provisions laid down in current legislation may vary depending not only on the animals' weight and size, but also on their physical condition, the meteorological conditions, and the likely journey time. Also, the surface area indicated for the different species may vary also depending on the breed, the size, the physical condition, and the length of fleece of the animals. Besides, It is always necessary to consider the risk that reducing densities increases the risk of horizontal and vertical displacement of the animals, increasing the risk of shocks and injuries inside the means of transport. Also, the % of air renewal inside the truck is an important factor to be taken into account as it will influence the temperature balance related to stocking density.</p>
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QUESTIONS FROM S & D	
QUESTIONS from MEP Carmen AVRAM	<ol style="list-style-type: none"> 1. What are the measures you foresee in order to improve and better implement the implementation of Regulation 1/2005? 2. What kind of traceability system would be needed in order to make sure Regulation 1/2005 is complied with even in third countries?
ANSWERS	<ol style="list-style-type: none"> 1. To avoid distortion of competition between operators in different countries, it is critical that European regulations are applied in the same way in all Member States and the first step is to provide the competent authorities in each country with the necessary tools to assess, control and sanction, if necessary, the compliance with the regulations. Based on the situation in each EU territory, we see a great opportunity for harmonization of animal welfare standards, provided that they have a solid scientific basis. As specific measures, we would recommend providing MS and authorities with adequate control tools, increase awareness for operators to prevent problems in the application of the Regulation, following the stipulations of the legislation. Training and digital controls along the trip could be interesting: in particular, to digitalise as much as possible from vehicle configuration, number of animals, duration of journey, etc. The assessment of animal welfare on arrival is also crucial to know whether the transport has been suitable or not, and the farmer is highly interested in knowing that (e.g., that the journey has been completed without stress, injuries, health problems for their animals...). We consider that for slaughter animals there should be enough inspections according to Regulation 1/2005 provisions at the slaughterhouse, and at the farm there should be random checks of animals to ensure everything complies with animal welfare legislation. We see the revision of the animal welfare legislation as a good opportunity to also harmonise the animal welfare standards, provided that they have a solid scientific basis. This will make them easier to comply with across the EU and facilitate their enforcement and implementation in all Member States. This may ensure also higher animal welfare requirements for transport and could also be beneficial for the internal EU market for animals and animal products, as it would reduce distortion of competition due to uneven enforcement of EU rules, thus providing for an even playing field for all actors of the livestock chain. 2. Copa and Cogeca would like to highlight that “where correctly implemented and enforced, Regulation 1/2005 has a positive impact on the welfare of animals during transport”. The Regulation is fit for purpose and effective, ensuring a high degree of traceability and welfare of the animals throughout the food chain. However, we acknowledge the differences in implementation of Regulation 1/2005 between the Member States given their different geographical and climatic conditions, among others. That is why we have always supported all possible efforts to be made across the food chain to fully harmonise it. Besides, we think that there should be a smooth, bilateral communication between the EU and third countries to synchronise their control databases. The EU may establish that for the log of transports leaving the EU, but also this transport log must follow EU conditions and should not be changed once it passes through the third country. We must ensure that within the export authorisation the conditions that must be fulfilled at least for the European operator are issued. We must also ensure that the transport conditions and, if necessary, food and drink for the animals must be prepared on departure from the EU origin point, and that everything is registered and authorised at the point of origin, even if the destination is a third country. Thereafter, communication between the EU and the third country is essential so that animal welfare is guaranteed

	<p>throughout the whole journey. There must be a correct interconnection between databases of different countries including Member States, counting all the countries through which the transport passes (inside and outside the EU). It is therefore of the utmost importance to Copa and Cogeca that the EU institutions further strengthen the functioning of the European single market through harmonized enforcement as well as clear and transparent implementation of the legislation for transport of animals across the EU.</p>
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QUESTIONS FROM RENEW	
QUESTIONS from MEP Martin HOJSÍK	At the moment the agricultural sector that is producing animals is under high pressure – ASF, avian influence and the high level of specialization put farmers under immense pressure. Closed system (piglet production and fattening in one farm) and extensification can be a solution concerning the problems connected to volatile markets and minimize live animal transport and environmental pollution as well. What do farmers need to transition to closed and more extensive systems?
ANSWERS	We consider this statement to be incorrect. Phased production also has sanitary control. These systems were created precisely to minimise the appearance and transmission of diseases, reducing mortality and the consumption of antibiotics while increasing efficiency and reducing environmental impact. Open and phased production models are very biosecure, but each farmer also adapts his production system to his geographical and market circumstances in the Member State. We think it is very important to give each operator the freedom to decide to produce the desired species with the system of his choice and adapted to his circumstances.
QUESTIONS from MEP Emma WIESNER	<ol style="list-style-type: none"> 1. In line with the importance to ensure safe, healthy and nutritious food in the whole EU: how do we prevent farmers' finances from being negatively affected as a result of higher demands on animal welfare, with a focus on higher standards on animals transport? 2. In order to avoid distortion competition in the internal market: how do we ensure that regulations related to animal welfare and safe food are designed and implemented in a way where all member states, and not just a few, follow the regulations?
ANSWERS	<ol style="list-style-type: none"> 1. One of the biggest challenges for EU farmers today, however, is to engage in sustainable production of affordable food while facing the effects of climate change, biodiversity loss and depletion of natural resources, as well as maintaining the population in rural areas while improving rural economy. Consumer demands are shifting towards increased animal welfare, which includes requirements regarding the product itself and how it is produced. Animal welfare during transport is also an important aspect of social sustainability and farmers make an effort to meet societal expectations. It is in the interest of all stakeholders involved that all transported animals arrive in a healthy and good condition. Furthermore, we want to help consumers to be able to trust in the high value and quality of the European agricultural and food sector by providing better and transparent communication, directly from farmers or indirectly through the EU institutions. Such consumer trust also depends on maintaining our high production standards for both animal health and welfare. Therefore, if these are social demands, consumers should be willing to take it up and economic transfer systems from the consumer to the farmer should be linked with 2 important elements: positive valuation of the European product compared to imports to avoid loss of competitiveness and the choice of the imported product; and a correct, truthful, and reliable traceability from farm to fork. What is made on a farm or series of farms or transports in a differential way can be the only thing that can be labelled and reach the consumer in a way that they can pay more for it with full knowledge and confidence. Clear communication and information to determine the differentiated quality; that the consumer notices in health and quality that this product is different and therefore must pay more for it; and, therefore, that the consumer knows that there is no fraud of any kind. The consumer receives the product for which he is paying. If

these principles are not complied with, the cost overruns are not passed on through the chain and the only person responsible will be the farmer.

2. We acknowledge again that legislation could have been implemented differently in the different Member States. The single market, one of the greatest achievements of the Union, is based on the principles of free trade and a level playing field as set out in the EU Treaties. These principles are also the driving force behind the successful development of the European agricultural sector. It is therefore of the utmost importance to Copa and Cogeca that the EU institutions further strengthen the functioning of the European single market through harmonised enforcement as well as clear and transparent implementation of the legislation for transport of animals across the EU. However, if we talk about controls in the respective Member States, it is true that we have little or no jurisdiction. We as farmers may suggest things that can be done within the heterogeneity of the EU, for instance to encourage the exchange of information between farmers, authorities, and transporters in the different Member States. For instance, in animal health matters, when a laboratory says it tests for disease X, it does "inter-laboratories": when faced with the same sample, it sends it to different laboratories to see what the results are and thus check that the sampling technique is adequate with respect to the reference one. This type of cross-checking in animal welfare could be interesting, to see how different regions of the EU work and if they obtain homogeneous inspection results for the same problem. Prior to these studies, the most important thing is harmonisation, and for this there is already a Commission tool such as the BTSF. Training at farm level, haulier level and at the destination, if it is not also a farm, is very important to ensure appropriate unloading and management of animals (e.g., slaughterhouses, assembly centres, reproduction centres, etc.). Some Member States' farm management legislation includes an obligation for professionals working on farms to have formal, fixed term, etc. training on animal welfare.

QUESTIONS FROM GREENS/EFA	
QUESTIONS	<p><u>Slaughterhouses:</u> Improving slaughterhouse availability with different slaughter possibilities is necessary if we want to shift to meat and carcasses trade, and to try to limit as much as possible live animal transport to slaughter facilities.</p> <p>> Have you witnessed difficulties for farmers to access slaughterhouses? If so, how do you explain them? What would be the solutions to develop local slaughterhouses and facilitate slaughter on-farm?</p> <p>> What actions need to be taken, at EU and Member State level, to promote mobile slaughter?</p> <p>What other actions need to be taken to improve the availability of local slaughter facilities across the EU, thus counteracting the increasing consolidation and geographical concentration of slaughter facilities in fewer, larger-scale units?</p>
ANSWERS	<p>➤ Copa and Cogeca agree that the regulation should also support any business wanting to build a new slaughterhouse if this offers farmers a wider range of sales options and a potential improvement for rural economy. Any professional initiative of an EU operator is welcome. On the other hand, livestock farmers in the single market have access to all EU operators and it guarantees the market freedom laid down in the EU Treaties. Moreover, freedom of choice and free trade is necessary to prevent monopolies. In cases where farmers have had no choice but to slaughter their animals at a single slaughterhouse, this has major economic consequences on their work and their competitiveness. Nevertheless, we also think that the EU should first give enough support to existing slaughterhouses of any size, so that they can improve their facilities and their animal management operations, instead of building more local slaughterhouses. This will avoid the risk for these facilities to be faced with overcapacity at a certain point, as this would make most of the local slaughterhouses to close in the short term and the big investments made would be for nothing. We feel that there will always be more of an economic impact on these slaughterhouses: in case of supply problems, the economic risk of stopping operations is higher (including diseases restricting animal movements in the area - ASF, HPAI...). Efficiency improvements can also be better taken into account when the farm is of a certain size. On the other hand, the authorisation of local slaughterhouses to export to third countries may not be given. From a sanitary point of view, it is neither good nor bad, but not being able to approve slaughterhouses for export is bad for the image of the EU in the international market and in the eyes of third countries regarding our high standards of health and quality (which are very high already by law).</p> <p>➤ Again, we welcome any initiative from an operator; if they feel that because of the species produced or the geographical conditions they decide they want to invest in this, we support them. However, the problems that we have already discussed in the local slaughterhouse are increased in the mobile. Mobile slaughterhouses have been used for decades, but only in very particular circumstances (e.g., direct sellers). Furthermore, it has been proven that a high part of the profitability and cost-effectiveness of the mobile slaughterhouses depends on the consumers' willingness to pay more, and the species slaughtered –cattle, broilers, pigs, etc.–. These systems have a role to play in more remote production systems, but not as much in mainstream food supply chains. Besides, it</p>

	<p>should also be taken into consideration that some of our trading partners may not accept meat and meat products coming from mobile slaughterhouses. In addition, having a lorry that you move from one place to another, the sanitary guarantees and waste management are even more complicated than in a fixed place. Also, the capacity is limited, so you may not reach the capacity you would like, and you have to delay the processes. On the other hand, it should also be taken into consideration that some of our trading partners may not accept meat and meat products coming from mobile slaughterhouses, and in terms of international image it would have, again, a negative "rebound" effect on our exports and this should not get compromised in order to maintain the balance of international trade. The risk is higher for our image outside the EU rather even than for the trade per se. For better or for worse, nowadays the large slaughterhouses are currently the best suited to solve the current and real problems of the market.</p>
<p>QUESTIONS</p>	<p><u>Specialisation of livestock production</u></p> <p>When we look at intra-EU trade, key issues are the structure of livestock production, characterised by an increasing specialisation of production and separation into breeding and fattening units, and slaughterhouse availability, as well as capacity. This process has encouraged large-scale intensive production. This has resulted in certain countries developing high self-sufficiency rates encouraging exports (for example, Ireland for cattle; Denmark and the Netherlands for piglets). The increase in long-distance intra-euro transport is driven by considerable growth in exports of cattle for other purposes than slaughter. This includes replacements for dairy herd or animals for further fattening, for example. Analysis of TRACES data shows a substantial increase in long distance live animal transport within the EU between 2005 and 2015.</p> <p>> What alternatives could be developed to mitigate this phenomenon and limit as much as possible transport of animals across EU and outside, in this case concerning those transported for other purposes than slaughtering? How could we encourage “closed” farming systems which do not involve the separation of the different stages of production?</p>
<p>ANSWERS</p>	<p>> Copa and Cogeca welcome the initiative to review the current legislation on transport of animals. We acknowledge the need for a revision and an update which can ensure harmonised enforcement of the legislation according to robust scientific knowledge. However, Copa and Cogeca would like to underline the importance of animals being transported in a responsible way and in compliance with current legislation. Transportation of live animals plays a vital role in maintaining the economic strength and social vibrancy of territories: the main production areas are in many cases located in depopulating or almost depopulated areas in the EU-27. Moreover, production types vary from one Member State to another. Climate, environment, and tradition have led to the development of different production models in each region. Transport of animals allows them to be complementary and therefore more sustainable and efficient. Practical experience and scientific research has shown that the main priorities should be the quality of the transport and fitness to travel, rather than the distance. The quality of the environment in the vehicles for animal transport is very important for animal welfare, which includes factors like ventilation, temperature, ceiling height, the nature of the floor, space allowance etc. Copa-Cogeca encourages the Commission to assess long distance transport in a holistic manner, considering both the transport of animals for export and the intra-EU transport of animals. Copa and Cogeca has already suggested to the Commission in its latest communications to ask EFSA to look into science-based adjustments in this context as a way to improve the quality for long distance transport, rather than focusing only on reducing the length</p>

	<p>of the journey. About the “closed systems”, as we answered above to MEP Hojsik from Renew, we would want to remind that this comes from a misconception that closed-cycle systems better guarantee animal health and welfare, as open systems also have sanitary control and provide animal welfare in different ways. Open systems were created precisely to minimise the appearance and transmission of diseases, reducing mortality and the consumption of antibiotics while increasing efficiency and reducing environmental impact. Open and phased production models are very biosecure, but each farmer also adapts his production system to his geographical and market circumstances in the Member State. We think it is very important to give each operator the freedom to decide to produce the desired species with the system of his choice and adapted to his circumstances.</p>
<p>QUESTIONS</p>	<p><u>Cold chain capacities in export markets</u> A key driver of the live trade between Member States and non-EU countries, particularly those that tend to be the major destinations for current EU exports in live animals, is a lack of infrastructure to facilitate trade in meat and carcasses, specifically poor/ insufficient cold chain facilities. This encourages the import of live animals for slaughter.</p> <p>> What solutions could be developed to support and improve cold chain capacities? How do stakeholders deal with this matter on the ground?</p> <p>> Provided that the shift to trade in meat and carcasses (for slaughter animals) and the shift to trade in genetic material (for breeding animals, where possible) is organised and publically supported in a way to make it economically viable and even interesting for livestock farmers and transporters, could we expect the members of COPA-COGECA to be open to these shifts?</p>
<p>ANSWERS</p>	<p>> It is difficult to determine which measures the EU can take to help third countries develop cold chain structures. In this respect, both the development of better feed and safer food should be a good driver for these countries to go for a cold chain system. At present, there is only the option of supplying these countries with live animals for their feed and supply, considering that the latest technologies in fresh food processing, which increase the life of fresh food, cannot be applied in the EU, as they can in other third countries such as the USA and Canada, open great opportunities for the market that we are not allowed.</p> <p>> Replacing the transportation of live animals by meat and carcasses, semen and embryos does not constitute a real opportunity for trade. In fact, these are completely different markets that require different logistics and know-how. Both the transportation of live animals, and exports of semen and embryos are needed for the different markets. Regarding in particular the export of breeding animals, Export of breeding animals from the EU also plays a role in the global development of sustainability and should be considered from a broader perspective. Breeding animals are in demand because of their good health status, productivity, and longevity. The export of breeding animals is often followed by exports of technologies, housing equipment, technologies for handling of slurry, veterinary services to reduce the use of antimicrobials and know-how, which are important factors in reducing the environmental impact of livestock production around the world. In many of the countries to which we export, veterinary expertise regarding artificial insemination or embryo transfers is lacking and still in its developmental phase. The problem lies not only in lower success rates, but also in the longer time period needed to develop the animal population in these countries. The countries would lose the genetic progress on the maternal side by not allowing</p>

	<p>imports of live animals. Besides, exporting animals of high genetic value is again very positive for the international image of the EU production and also determines the EU's technological and sanitary positioning, thus supporting the usefulness of the extensive and precise legislation we already have implemented in the EU.</p>
<p>QUESTIONS</p>	<p><u>Transports outside EU</u></p> <p>Report on animal welfare during exports (DG SANTE 6834) state that “the available information indicates that most transporters do not meet applicable EU rules after leaving the Union. The absence of agreements with EU neighbouring countries, together with poor retrospective checks and the inability of Member States to ascertain the conditions of transport and the feasibility of the plan for that part of the journey contribute to that concern.”</p> <p>Regarding the lack of feedback from third countries on the condition of animals during transport and at arrival (DG(SANTE) 2019-6835), it is impossible for Member States to assess compliance. To enforce this Court ruling, would mean for Member States to refuse any export of animals towards non-EU countries (clear link with meat trade). If we look at transports in the Middle East and in North Africa, they do not fulfil European law but are totally outside the sphere of influence of the organiser: no authorization of the local transport company, no approval of the lorries and no certification of competence of the person responsible for the load, and no contingency planning.</p> <p>> When a part of the journey is to be made outside EU, how can we make sure the comply with EU Regulation, can prove it to competent authorities? Many professionals auditioned underlined the need to shift from live animal transport to a meat, carcasses, and genetic material transport. From your point of view, how feasible and advisable is this solution?</p> <p>> Are the members of COPA-COGECA and the livestock farmers that they represent aware of the general lack of proper supervision and care at sea, what do they think about this and what solutions do they propose?</p>
<p>ANSWERS</p>	<p>➤ Transportation of live animals to third countries plays an important role for EU Member State exports. Actions increasing animal welfare standards during transportation to third countries may be the most effective investment to promote high animal welfare standards and help the EU animal husbandry sector to flourish. Within the EU, farmers have specialized in breeding animals that reflect the characteristics of the land, the available technology, and the economic environment where they produce. In some cases, there is also interaction among different sectors which are located in different regions. Transport is what connects these diverse production realities. Therefore, major restrictions or even a ban on free movement of animals could severely hamper competitiveness and sustainability in rural areas across the entire EU. Furthermore, over the past decade, many third countries have improved their animal welfare legislation inter alia due to continuous pressure from the Commission at international level (something that the Parliament has also demanded many times). To say that animal transportation is not regulated at all in these countries would be incorrect and give the wrong impression. A blanket ban on exports of live animals would be very detrimental not only to EU producers but to the whole international trade balance and genetic quality of livestock around the world. Therefore, an agreement between the EU and the respective countries based on mutual respect needs to be reached. Furthermore, breeding exports from the EU are the basis for building up efficient livestock sectors in third countries and make a significant contribution to the economic development of these countries. Copa and Cogeca believe it is</p>

important to continue to focus on international initiatives such as bilateral and multilateral negotiations and cooperation with the WTO, OIE and FAO, as there is still a lot of work to be done to ensure mutual understanding on animal welfare. Therefore, an agreement between the EU and the respective countries based on mutual respect needs to be reached. Furthermore, breeding exports from the EU are the basis for building up efficient livestock sectors in third countries and make a significant contribution to the economic development of these countries. Besides, trade of high value breeding stock is crucial, both to ensure continued genetic improvement and to allow our world class genetics, developed within the EU, to be exported to countries all over the world.

- Animal welfare during transport is a very complex area of expertise, where very little science-based research has been carried out, especially on long-distance transport. It is important to ensure that all future legislative proposals, on this or any other agriculture-related issue, have a robust scientific basis before any decision is taken at political level in the EU. We would therefore encourage the Commission to ask EFSA to conduct further research on the areas where scientific work still needs to be done before any recommendations on legislative proposals can be delivered. It must be acknowledged that certain forms of transport other than land transport (e.g., sea transport) are still necessary for animals for commercial and cost-efficiency reasons in order to keep the balance of international trade. Higher animal welfare standards during transport to third countries leads to a better image for EU producers worldwide and could be used as an example for good practices in the exchanges with our trading partners.

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ANSWERS	

	QUESTIONS FROM ECR
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ANSWERS	

	QUESTIONS FROM THE LEFT
<p>QUESTIONS</p>	<p>1. In the COPA-COGECA’s contribution to the animal welfare revision of EU legislation, it is said that “long-distance travel for young animals is possible and can be in line with the current animal welfare discussions”. Nevertheless, many specialists (veterinarians, scientists, NGOs representatives) clearly stated that unweaned animals simply cannot be transported accordingly given their biological needs. On what scientific basis do you advocate the transport of unweaned animals?</p> <p>2. We were surprised to read in this contribution that noncompliance with EU regulation regarding live animal transport “leads to negative headlines and scandals in the media that give a highly negative image of EU livestock operators and their day-to-day work”.</p> <p>Don’t you think that the main problem here is actually the fact that some operators simply do not respect EU legislation and that sentient animals are suffering from being transported in poor conditions, rather than giving a negative image of the sector?</p> <p>What do you think should be done to avoid that?</p> <p>How, in your opinion, could we ensure that transport operators respect the EU legislation?</p> <p>Would you agree that more inspectors are needed, both veterinary and road police? In your opinion, how situation could be improved here?</p>
<p>ANSWERS</p>	<p>1.- Young animals are not the same as unweaned animals. In the current regulation R 1/2005 allow the transport of piglets less than three weeks old, lambs less than one week old and calves less than ten days old is not allowed, unless the transport distance is less than 100 km. We consider that unweaned animals should only be transported under certain conditions, under veterinary supervision and with a clear and specific objective, for example to carry out health improvement programmes to prevent the transmission of diseases between sick and healthy animals. However, we differentiate between the transport of unweaned animals, which we consider should be avoided in addition to or reduced to veterinary procedures, and the transport of non-adult animals (young animals) which, depending on the production system, animal species, region of Europe, should be maintained.</p> <p>2.- The negative image of EU livestock operators is simply the end point of the problem whereby the involvement in the previous steps is demonstrated. Looking at the process in a schematic way one could say that the steps to generate an animal welfare problem are non-compliance with the regulations, generating distortion of competition with other operators that do comply, generating an animal welfare problem for the transported animals under UE legislation, generating a problem of negative public opinion among consumers and finally rejecting the consumption of the European product. We are against each and every one of these chains of events that ultimately lead to a direct negative impact for the operator. This is where we qualify the degree of commitment because we know that a defect in the animal welfare of our animals generates a problem for the operator. Therefore, at Copa Cogeca we are against non-compliance with the regulations, we are opposed to the distortion of competition in the single market, we do not want animals to suffer when they are</p>

transported in breach of the regulations, and all this is materialized by the fact that we do not want to have a negative image either. Therefore, if you do not want to have a negative image, you have to avoid all the steps that lead to it.

3.- In general view, transport operators fully respect de UE legislation. But there is some operators that would like to have a better economic position in the market that other by the way of circumventing existing regulations. Control by the competent authorities is necessary to ensure that animal welfare is respected in all countries and by all operators and that there is no distortion of competition to the detriment of those who comply.

4.- The need for more inspections is welcomed by Copa Cogeca with the objective of amply demonstrating that the vast majority of operators comply with the regulations. However, it is beyond our scope to assess the number of inspectors available to the competent authorities in each country. In our opinion, what is necessary is to harmonize the number of inspections according to the number of transports and each competent authority, depending on inspection times, animal biosecurity, distances within the country itself for the movement of inspectors, should determine the minimum number of inspectors to carry out the task entrusted to them.