

# Annex A. Public consultation on the draft scientific opinion on the Protection of Animals During Transport

European Food Safety Authority (EFSA)

## Abstract

The European Food Safety Authority (EFSA) consulted interested parties about the mandate received from the European Commission entitled the 'Protection of Animals during Transport'. The document submitted for public consultation included the terms of reference of the mandate received from the European Commission, the interpretation of the mandate by the members of the relevant working group as well as sections on the transport practices that will be assessed by EFSA according to the protocols as described in the mandate. This public consultation gave stakeholders the opportunity to provide useful information in relation to current transport practices that may have been omitted thereby enabling EFSA to produce a more comprehensive assessment. For example, stakeholders were asked to identify any other transport practices, in addition to the common transport practices and the seven specific scenarios described in the document, where practical difficulties exist or where there is insufficient information in ensuring the welfare of animals in question. The written public consultation for this document was open from 15 April to 10 June 2021. This report, which summarises the outcome of the public consultation, includes a brief summary of the comments received and how they were addressed in the final document/guidance. In total 174 comments were submitted by interested parties, all of them by anonymous contributors. From those, sixteen comments had no comment or "nonsense comment (e.g. "test", "no comment) or were provided in another language other than English. Twenty nine comments were identical duplicates or had the same content or similar phraseology to other comments, and 109 comments were out of the scope of this public consultation, as they referred to risk management, bad practices, economic impact or legislation). Finally, 20 comments were considered in the scope and related to the objectives of this public consultation and they were considered and answered individually. EFSA and its Scientific Panel on Animal Health and Welfare wish to thank all stakeholders for their contributions.

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## 1. Introduction

The European Food Safety Authority (EFSA) consulted interested parties about the mandate received from the European Commission entitled the 'Protection of Animals during Transport'. The document submitted for public consultation addressed the terms of reference of the mandate received from the European Commission requesting EFSA to review available scientific publications and possibly other sources to provide a sound scientific basis for future legislative proposals in relation to the welfare of terrestrial animals during transport. It also includes a section on the interpretation of the mandate by the members of the relevant Working Group, as well as sections on the transport practices that will be assessed by EFSA according to the protocols as described in the mandate.

The mandate Working Group considers that the transport practices described, are the most relevant for assessment. Nevertheless, this public consultation gave stakeholders the opportunity to provide useful information in relation to current transport practices that may have been omitted thereby enabling EFSA to produce a more comprehensive assessment. Therefore, it would be valuable to EFSA if stakeholders could identify any other transport practices, in addition to the common transport practices and the seven specific scenarios described, where practical difficulties exist or where there is insufficient information in ensuring the welfare of animals in question. It would also be very important for EFSA to learn what the practical difficulties are, and what the insufficient information is, for the seven specific practices or scenarios, and for any other additional practices identified. In addition, EFSA would welcome any available recorded data related to the microclimatic environment experienced by animals during transport. By microclimatic data we refer to the environmental temperature, humidity and ammonia levels that the animals are exposed to in their form of transport during the journey. It would be of particular value if these microclimatic conditions were linked to adverse welfare experiences as indicated by animal based measures (ABMs).

The written public consultation for this document was open from 15 April to 10 June 2021. This report, which summarises the outcome of the public consultation, includes the comments received, how they were categorised and how they were addressed and answered.

## 2. Data and Methodologies

Appendix A of this annex contains an explanatory text for the public consultation on the draft Scientific Opinion on public consultation concerning the protection of animals during transport.

Appendix B of this annex contains the full list of the comments submitted by the interested parties by means of the electronic form on the EFSA website and its assessment (answers).

In total, 174 comments were received by EFSA in this public consultation. All stakeholders requested anonymity, therefore no analysis of the stakeholders involved nor their nationality was allowed for data protection purposes.

All comments were classified according the following classes/clusters: i) comments related to current public consultation (in the scope), ii) empty/no comments/other languages (Not Applicable -NA), iii) repetition/same phraseology and iv) out of scope (e.g. risk management aspects, economic aspects, legislation, etc.). All comments were answered in Appendix B by a narrative text for each comment (Answer).

**Table 3:** Number of comments per identified cluster

Cluster	Number of comments
In the scope	20

Empty/no comments/other languages (NA)	16
Repetition/repeated comments with same phraseology	29
Out of scope (e.g. risk management aspects, economic aspects, legislation, etc)	109

### **3. Assessment**

See Appendices B and C.

## **Appendix A – Explanatory text for the public consultation on the draft Scientific Opinion on public consultation Concerning the Protection of Animals During Transport**

### **Scope of Consultation**

The European Food Safety Authority (EFSA) wishes to consult interested parties about the mandate received from the European Commission entitled the 'Protection of Animals during Transport'. This draft document addresses the terms of reference of the mandate received from the European Commission requesting EFSA to review available scientific publications and possibly other sources to provide a sound scientific basis for future legislative proposals in relation to the welfare of terrestrial animals during transport. It also includes a section on the interpretation of the mandate by the members of the relevant Working Group as well as sections on the transport practices that will be assessed by EFSA according to the protocols as described in the mandate. The mandate Working Group considers that the transport practices described, are the most relevant for assessment. Nevertheless, this public consultation gives stakeholders the opportunity to provide useful information in relation to current transport practices that may have been omitted thereby enabling EFSA to produce a more comprehensive assessment. Therefore, it would be valuable to EFSA if stakeholders could identify:

- Any industry practices of particular concern not already identified above.
- Describe the practical difficulties or insufficient information in ensuring the welfare of animals, for the seven specific transport practices and for any other additional practices of concern that might be identified.
- Available recorded data from road or sea transport, for example from a data logger, related to the microclimatic environment (temperature, humidity and ammonia levels). The data should demonstrate a link between the microclimatic conditions and any adverse welfare consequences that are experienced by the animals during transport.

Comments will not be considered if they:

- are submitted in other languages than English;
- are submitted after the closing date of the consultation;
- are still in 'draft' status on the closing date of the consultation;
- are presented in any form other than what is provided for in the instructions and the relevant function in the tool (e.g. comments made by email will not be considered);
- are made outside the corresponding fields of the form, for instance as part of supporting files uploaded in the tool;
- are not related to the contents of the document or scope of the consultation;
- contain complaints against institutions, personal accusations, irrelevant or offensive statements or material;
- are related to policy or risk management aspects, which are out of the scope of EFSA's activity.

Comments will be assessed in line with the criteria above and taken into consideration if found to be relevant.

## **Copyright-cleared contributions**

Persons or organizations participating in a public consultation of EFSA are responsible for ensuring that they hold all the rights necessary for their submissions and subsequent publication by EFSA. Comments should inter alia be copyright-cleared considering EFSA's transparency policy and practice to publish all submissions. In case the submission reproduces third-party content in the form of charts, graphs or images, the required prior permissions of the right holder(s) should have been obtained by the public consultation respondent

## **Publication of contributions**

Third-party comments will be made public in their original form without delay after the closing date of the consultation and may be reused by EFSA in a different context. The outcome of the consultation will be made public in conjunction with the publication of the relevant scientific output. Contributions submitted by individuals in a personal capacity will be published indicating the author's first and family name, unless the respondent has requested anonymity. Contributions submitted on behalf of an organisation will be attributed to the organization in question.

## Appendix B – Full list of comments submitted by means of the electronic form on the EFSA website

	Cluster	Comment	Answer
1	NA	¿Quién controla el peso de los animales durante el transporte?. ¿O al llegar a su destino?	Not applicable/no need/no comment
2	NA	Sabemos el numero de animales que van en un "traces", Sabemos la superficie del medio de transporte, el dato que falta es el peso de los animales...	Not applicable/no need/no comment
3	NA	Se debería controlar el peso total de los trasportes, restando la tara del vehículo...sabemos el peso medio por animal , es fácil. El organizador del transporte, si le faltan metros o quiere llevar mas animales ,solo tiene que dar un dato falso del peso de los animales. Ejemplo, los corderos que voy a transportar pesan 19 kg en vez de 28 kg...	Not applicable/no need/no comment
4	Out of scope	It is normal, logical and healthy that the BEA is at the heart of the concerns of those who handle animals.	Not applicable/no need/no comment
5	Out of scope	Export by livestock vessel - Animal welfare - RecordS	Not applicable/no need/no comment
6	Out of scope	Process of exporting live animals by sea : - Validation of the animals' suitability for transport by the DDPP. - Road transport with official approval of type 2 trucks - Minimisation of transport times (2 drivers instead of one). - Minimisation of waiting times for trucks before unloading. - Storage of animals in a building approved by the Bureau Véritas. Monitoring and control of qualitative and quantitative parameters (density, temperature, mulching, disinfection, cleaning, ventilation, luminosity, unlimited feeding and respect of compatibility groups between animals). - Embarkation of the animals on vessels approved by the State services.	Not applicable/no need/no comment
7	Out of scope	Company certified on the basis of CE 1/2005 and implementation of higher measures according to standard 34700. Company with a "Certificate of Recognition" on the assessment of animal welfare in livestock parks.	Not applicable/no need/no comment
8	Out of scope	Request: the veterinary services or state-appointed veterinarians present during the entire loading period.	Not applicable/no need/no comment
9	Out of scope	Please do not hesitate to contact us for further information or to visit the site.	Not applicable/no need/no comment
10	Out of scope	Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/976.	Not applicable/no need/no comment

<b>11</b>	Out of scope	a. Preparation for transport: verification of fitness for transport by veterinary services, handling of animals by trained personnel (CAPTAV or other), loading and unloading of animals by trained personnel. b. Means of transport: approved type 2 livestock and vessels approved by the DDPP. c. Feed calculated and supplied by an independent service provider. Calculation of requirements according to the number of animals and the physiological stage of each. Observation of weight gain in the vessels. c. Density of animals within the pens validated by the veterinary services. e. Average waiting time for unloading trucks of 47 minutes at the approved export centre in Sète. Road and stockyard accidents < 0.017% in 2020. Attached is the truck waiting time data (truck number plates are confidential)	Not applicable/no need/no comment
<b>12</b>	Out of scope	Respect for animal welfare is an economic obligation because poor animal welfare management has a direct impact on trade. On the other hand, the reduced economic margin generated by the export activity on volume requires a total control of animal welfare. The added value generated is on the last animals exported so no neglect is made of animal welfare.	Not applicable/no need/no comment
<b>13</b>	NA	The Parc à bestiaux de Sète has a perfect knowledge and a total control of the exported animals because of a specialisation of the species (bovines and sheep). The facilities, handling and type of feed provided are adapted to these species	Not applicable/no need/no comment
<b>14</b>	Out of scope	One of the objective and non-anthropomorphic criteria is weight gain during transport. (Provision of free-flowing food in the ships).	Not applicable/no need/no comment
<b>15</b>	Out of scope	The logistics are of concern for animal welfare and emissions. Please read attached.	Not applicable/no need/no comment
<b>16</b>	Out of scope	Stop cruel live animal transport! Live animal transport is inhuman, it's barbaric. Time to evolve. We are better than this. Other countries are stepping forward with banning live animal transport. This is the least we can do for those animals. We should not participate in this horrific practice. Do not analyze "microclimatic conditions", just ban it.	Not applicable/no need/no comment
<b>17</b>	Out of scope	Live animal transport is inhuman, it's barbaric. Time to evolve. We are better than this. Other countries are stepping forward with banning live animal transport. This is the least we can do for those animals. We should not participate in this horrific practice. Do not analyze "microclimatic conditions", just ban it.	Not applicable/no need/no comment
<b>18</b>	Out of scope	stop long distance shipments	Not applicable/no need/no comment
<b>19</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment
<b>20</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment
<b>21</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment
<b>22</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment

<b>23</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment
<b>24</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment
<b>25</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment
<b>26</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment
<b>27</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment
<b>28</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment
<b>29</b>	Repetition	stop long distance shipments	Not applicable/no need/no comment
<b>30</b>	Out of scope	Here are some collected thoughts about difficulties/problems associated with animal transportation in Sweden. ? Requirements according the driving/rest time regulation for breaks at certain times do not correspond to the welfare of the animals. ? The requirement for supervision and care while driving in maximized vehicles with floor systems. ? Assessment of approved (inspected) vehicles for animal transport differs because there is no standard. ? There should be a possibility to "practice driving" before obtaining a competency certificate. ? Load limitation for livestock is too rough and do not consider the animals' physique or need for support (against other animals) during transport. ? Road standard is not considered in the restrictions of transport. More research is required. ? Demands for studies that better guide how ventilation should be designed and how separations affect the function. And requirements for possible "emergency ventilation" in the event of an accident. ? Continuing education linked to the certificate of competence is needed. ? Requirements for functional control of movable load planes such as those made for tailgate lifts is needed. ? Guidelines for drivers' responsibilities / powers when assessing "suitable for transport" is needed. ? Transfer of transport responsibility when several drivers are used for one transport.	Not applicable/no need/no comment
<b>31</b>	NA	Test 3	Not applicable/no need/no comment
<b>32</b>	NA	just testing the system to see how does this work! Goran	Not applicable/no need/no comment
<b>33</b>	NA	test	Not applicable/no need/no comment
<b>34</b>	NA	test 2	Not applicable/no need/no comment
<b>35</b>	Out of scope	The transport of unweaned calves is currently being studied, particularly in Ireland (MOOVE Project). The results should be very enlightening for a risk analysis on this subject as well as for the identification of possible solutions. These results are not yet available.	Not applicable/no need/no comment
<b>36</b>	Out of scope	In addition to the regulatory texts, good practice guides, based on scientific knowledge and publications as well as on information gathered from stakeholders, have been worked on hand shared at European level through the Animal Transport Guide project commissioned by the European Commission in 2015. The social regulations that regulate the driving time of drivers are often incompatible	Not applicable/no need/no comment

		<p>with the regulations on the protection of animals during transport. Indeed, it can happen that drivers are forced to take a break while they are almost at destination, or even sometimes already within the confines of the destination but not at the exact location of the unloading site. In this case, the truck has to stop, which prevents the animals from being unloaded and thus prolongs the duration of the transport for the animals. Furthermore, the organisation of controls by the competent authorities can sometimes penalise transporters in the organisation and execution of transport operations: - This is the case for delays in controls, which are very difficult to predict, - This is also the case when departure times have to be adapted to the availability of the competent authorities, who must be present when the trucks are loaded. This can lead to disorganisation on arrival at the destination, for example trucks waiting in port for more than 4 hours before boarding the vessels. Please note that the transport of unweaned calves is currently being studied, particularly in Ireland (MOOVE Project). The results should be very enlightening for a risk analysis on this subject as well as for the identification of possible solutions. These results are not yet available.</p>	
<b>37</b>	Repetition	<p>In addition to the regulatory texts, good practice guides, based on scientific knowledge and publications as well as on informations gathered from stakeholders, have been worked on hand shared at European level through the Animal Transport Guide project commissioned by the European Commission in 2015.</p>	Not applicable/no need/no comment
<b>38</b>	Out of scope	<p>Regarding the documents made available to professionals to guarantee animal welfare, we would like to remind you that good practice guides based on scientific knowledge and publications as well as on information collected from stakeholders have been worked on "animal transport guide". For transport by sea, the majority of charterers provide a daily report on temperatures in the holds and humidity.</p>	Not applicable/no need/no comment
<b>39</b>	Out of scope	<p>We have not identified any other transport practices. Regarding the practical difficulties, operators organize themselves to guarantee animal welfare. Indeed, the animals must be well transported for the transporter to be paid. All long-distance trips use trucks equipped with fans and record the temperature in the animals' cabins. A sensor alerts the driver if the temperature is too high. The operator can then activate the fans to reduce the temperature. The operators do not hesitate to reduce the recommended density. Animal welfare is at the heart of our pre-occupation, at the national level a label of social responsibility has been created by our federation: QUALI NEGOCE, a strong commitment. At the French level, transport during orange or red heatwave alerts is stopped between 1pm and 6pm. Operators modify their schedules during hot weather to ensure the well-being of the animals.</p>	Not applicable/no need/no comment

<p><b>40</b></p>	<p>In the scope</p>	<p>We did not identify any other transportation practices. We identified 3 difficulties for export by ship and roll on, roll off: 1- The availability of veterinary. We need veterinary for loading truck, but they are not very available. Most time operators begin their way before. So they wait in the port. 2- Customs restriction. Customs makes the trucks wait at the entrance of the port. So animal wait and can't be unloaded. 3- At the time of applying EU Regulation on transport of animals and the Directives that regulates the 'welfare' of transporters at national level, they result contradictory. Especially when it comes to rules on how many hours one person can drive and then the time needed to transport animals the quickest way. We believe the regulation should be aligned to bring out as much efficiency as possible in this regard. For road transport, we have identified a common difficulty with export, which is the inflexibility of the social regulations of transport, which generally lengthens the transport time of animals.</p>	<p>This issues raised here do not fall within the expertise of animal welfare and so can only be considered and resolved by the relevant risk managers.</p>
<p><b>41</b></p>	<p>Repetition</p>	<p>We have identified 3 difficulties for export by ship and roll on, roll off: - Veterinarian availability. Exporters have to adapt to the vets, which leads to early departures from the center and waiting at the ports. - Customs. Some customs officers block trucks at the entrance to ports for no particular reason, which delays the loading of animals - The social regulations of the transport which can go against the animal welfare. Often the animals cannot be unloaded because the driver is on break. The inflexibility of the social regulations of transport leads to longer transport times. For road transport, we have identified a common difficulty with export, which is the inflexibility of the social regulations of transport, which generally lengthens the transport time of animals.</p>	<p>This is repeat of comment 40.</p>
<p><b>42</b></p>	<p>Repetition</p>	<p>We have not identified any other transport practices. Regarding the practical difficulties, operators organize themselves to guarantee animal welfare. Indeed, the animals must be well transported for the transporter to be paid. All long-distance trips use trucks equipped with fans and record the temperature in the animals' cabins. A sensor alerts the driver if the temperature is too high. The operator can then activate the fans to reduce the temperature. The operators do not hesitate to reduce the recommended density. Animal welfare is at the heart of our pre-occupation, at the national level a label of social responsibility has been created by our federation: QUALI NEGOCE, a strong commitment. At the French level, transport during orange or red heatwave alerts is stopped between 1pm and 6pm. Operators modify their schedules during hot weather to ensure the well-being of the animals.</p>	<p>This is repeat of comment 39.</p>
<p><b>43</b></p>	<p>Repetition</p>	<p>We did not identify any other transportation practices. We identified 3 difficulties for export by ship and roll on, roll off: - Veterinarian availability. Exporters must accommodate veterinarians, which results in early departures from the center and waits at ports. - Customs. Some customs officers block trucks at the entrance to ports for no particular reason, which delays the loading of animals - The social regulations of the transport which can go against the animal welfare. Often the</p>	<p>This is repeat of comment 40.</p>

		animals cannot be unloaded because the driver is on break. The inflexibility of the social regulations of transport leads to longer transport times. For road transport, we have identified a common difficulty with export, which is the inflexibility of the social regulations of transport, which generally lengthens the transport time of animals.	
44	Repetition	We have identified 3 difficulties for export by ship and roll on, roll off: - Veterinarian availability. Exporters have to adapt to the vets, which leads to early departures from the center and waiting at the ports. - Customs. Some customs officers block trucks at the entrance to ports for no particular reason, which delays the loading of animals - The social regulations of the transport which can go against the animal welfare. Often the animals cannot be unloaded because the driver is on break. The inflexibility of the social regulations of transport leads to longer transport times. For road transport, we have identified a common difficulty with export, which is the inflexibility of the social regulations of transport, which generally lengthens the transport time of animals.	Not applicable/no need/no comment
45	Out of scope	Regarding the documents made available to professionals to guarantee animal welfare, we would like to remind you that good practice guides have been produced with the professional unions "animal transport guide". For transport by sea, the majority of shippers provide a daily report on the temperature in the holds and the humidity.	Not applicable/no need/no comment
46	In the scope	MY comment is about " identify any industry practices of particular concern not already identified "page 10 paragraph 1 of your PDF	EFSA's remit was not to assess the current legislation but to use the assessment methodology to identify when and where the animals welfare is compromised . Please see the opinions for recommendations made in this area and other points referred in the attached document.
47	Out of scope	2.2.1 Assessment of common transport practices a. the preparation for transport (including catching and crating of poultry and rabbits), loading, unloading and handling of animals at all stages of the journey, including at destination,	Not applicable/no need/no comment
48	Out of scope	Swedish pig transport drivers working situation and handling practices, including physical workload, psychosocial environment and handling behaviour, have recently been investigated by researchers connected to The Swedish University of agricultural sciences, Melbourne University and Lund University. Also behaviour in pigs during loading have been investigated. This research is important since the literature on their work is poorly documented. See attached word document etc. for full information.	Not applicable/no need/no comment
49	Out of scope	Attached is the evidence documented by PATAV demonstrating that in case of full compliance the Regulation (EC) No. 1/2005 in case of live transport of sheep and bovines by vessels it is impossible to achieve the level of animal welfare as detailed by the Animal Based Measures laid out in EFSA (2012) Scientific Opinion.	Not applicable/no need/no comment

		PATAV is available to provide additional information to the EFSA researchers at any point at their convenience. E-mail: info.patav@gmail.com Facebook: www.facebook.com/ Site: www.patav.weebly.com	
<b>50</b>	Out of scope	PATAV's multiyear collaboration with relevant national authorities and monitoring of the current practice testify to the fact that in case of full and consistent compliance with the Regulation (EC) No. 1/2005, the long-distance export of live animals (sheep and bovines) by vessels due to the inherent characteristics of this mode of transport does not allow achieving Animal Based Measures that would amount to a minimum level of welfare, as laid out by the relevant EFSA (2012) Scientific Opinion. We attach the detailed evidence. PATAV would like to invite EFSA to consider the bias in the primary data provided by the livestock industry or affiliated researchers that would significantly skew the welfare assessments, as the usual peer review process does not habitually verify such primary data (i.e. ammonia levels, temperature data etc.). The industry actors have multiple economic incentives to misrepresent the levels of welfare animals experience in transport to ensure continuations of the practice. In its 5 years of activities PATAV observes an escalation in industry's efforts to limit access of independent actors to transported animals. Transport operators are filmed breaking general legislation and regulation (i.e. national traffic laws), to prevent sightings of transported animals. We find this practice to be of particular concern. Additionally, we would highlight multiple complaints of the local communities at and around the points of loading in the EU and unloading in the 3rd countries, as well as the industry staff exposed to the some of the same conditions as the transported animals in the light of the ONE HEALTH approach. We invite EFSA to consider implications of live transports by livestock vessels for the human health and animal welfare, ensuring the balancing out of truly independent research of animal welfare implications with the scientific output affiliated with the livestock industry, even when such output is peer reviewed.	Not applicable/no need/no comment
<b>51</b>	NA	L'IFIP, Institut du porc a réalisé en 2003 une étude sur le transport des porcs sur une période de 36h, période assortie d'une période de repos de 9h. Elle met en évidence: - le déchargement des porc avant la période de repos est une source de stress pour les animaux - une augmentation de la surface par porcs dans le camion (0.42 m2 pour 100kg de poids vif)ne change en rien sur les consommations d'aliment et d'eau. de plus au niveau du comportement des animaux (couché, assis, debout), il n'y a pas de différences observées. - une auge de 7cm par porc est nécessaire pour assurer une alimentation correcte des porcs.	Not applicable/no need/no comment

<p><b>52</b></p>	<p>NA</p>	<p>l'Agence de la Sélection Porcine regroupe l'ensemble des organisations de Sélection Porcine en France. C'est au sein de l'Agence de la Sélection que ses opérateurs (concurrents entre eux) se sont mis d'accord sur un socle commun de suivi sanitaire des élevages de sélection et de multiplication pour assurer un haut statut sanitaire aux futurs reproducteurs livrés dans les élevages de production en France, mais également en Europe ou vers des pays tiers. Ceci démontre bien l'intérêt des entreprises de sélection d'associer création de progrès génétique et très haut niveau sanitaire. Pour diffuser la génétique porcine, la voie la plus efficace est la vente de reproducteurs. En effet, la collecte et la mise en place d'embryon donne des résultats techniques médiocres; la semence porcine permet de diffuser que 50% du potentiel génétique. Il convient donc de différencier le transport des reproducteurs par rapport aux porc dont la destination est l'abattoir pour les raisons suivantes: - l'introduction de reproducteurs dans un élevage représente le potentiel de production des 2 à 3 années futures d'où un intérêt pour le fournisseur et le client d'assurer le meilleur confort des animaux durant le transport pour ne pas remettre en cause la future carrière de l'animal - les exigences sanitaire des clients et celles indiquées sur les certificats sanitaires font que le statut sanitaire de ces animaux est très bien connu. Elles plaident également pour le non déchargement des animaux aux points de contrôle afin de ne pas hypothéquer le statut sanitaire des animaux. C'est un gage de maîtrise de non transmission des maladies à travers l'Europe et vers les Pays Tiers.</p>	<p>Not applicable/no need/no comment</p>
<p><b>53</b></p>	<p>Out of scope</p>	<p>Page 2 lines 10-12 and page 6, lines 1-3. It is in the opinion of Animals? Angels that while reviewing available scientific publications, also new scientific evidence, publications, and other sources regarding the sentience and needs of ?farmed? animal species (according to classical ethology and not only to applied ethology), should be reviewed and considered. Page 2, line 5 Animals? Angels regrets that transport of fishes is not part of the mandate of the EU COM, which is about terrestrial animals only, contrary to Article 13 TFEU that recognises fish as sentient beings and contrary to Reg. 1/2005 that applies also to fishes, without providing specific indications, which are needed. Animals' Angels strongly wishes that another mandate will cover fish transports.</p>	<p>Not applicable/no need/no comment</p>

<p><b>54</b></p>	<p>In the scope</p>	<p>Page 10, line 4 (point 1). Please find the answer to this request in comments to section 1 (additional industry transport practices/scenarios of concern). Page 10, lines 5-7 (point 2). Please find the description of practical difficulties or insufficient information concerning additional industry transport practices of concern in the attached PDF document. Page 10, lines 8-12, point 3 To date, there is insufficient information regarding the microclimate inside road vehicles, because the Regulation requires to only measure and record the temperature, in disregard of humidity and gas levels. Hence evidence of recorded temperatures and observed welfare consequences do not necessarily show the full picture. E.g., when animals are not showing visible adverse welfare consequences at 30°C or at 0°C, this cannot be a threshold, unless other parameters are included. Please find cases witnessed by Animals ´Angels in the attached PDF document (Description of microclimatic environments witnessed by Animals).</p>	<p>The scientific assessment carried out by EFSA takes two forms. Firstly, for road transport practices, which is the most common transport practice, the transport stages are described and assessed in terms of welfare consequences (WCs), animal-based measures (ABMs) and hazards leading to the WCs. In addition, recommendations to prevent hazards and mitigate/correct WCs are provided. The preventive measures relate to the hazards, and the corrective/mitigation measures refer to the WCs. Where possible, the assessment leads to the establishment of recommendations on quantitative thresholds for microclimatic conditions within means of transport (maximum temperature), and to spatial thresholds (minimum space allowance). In addition, the development of WCs over time is assessed in relation to maximum journey duration. While the Scientific Opinion mainly focuses on road transport, there are specific sections dealing with the following means of transport: Roll-on roll-off ferries (RO-RO), livestock vessels, air and rail. For the specific industry practices (specific scenarios) listed in the mandate, EFSA examines selected welfare concerns (defined as an area or a topic to which special attention should be given in order to potentially avoid WCs), and, where possible, suggests recommendations. The specific welfare concerns mentioned in your document were addressed in the opinions. Please see conclusions and recommendations detailed in the five welfare during transport opinions.</p>
<p><b>55</b></p>	<p>Out of scope</p>	<p>Page 6, lines 28-29 Also consider an additional point: f. characteristics and needs of transported animal species: hierarchic behaviours, ethological needs, animal category (young, pregnant, end of career etc), breed characteristics (temper, horns, long fleece, physical conformation etc). Page 6, lines 35-38 Animals ´Angels objects that relevance of welfare consequences will not be based on a comprehensive risk assessment. Animals ´Angels asks that Efsa ´s experts indicate all welfare consequences and their level of severity, duration and occurrence so that their method of selection of relevant and non-relevant is transparent.</p>	<p>Not applicable/no need/no comment</p>

<p><b>56</b></p>	<p>Out of scope</p>	<p>Page 8, line 24. Please describe the case when welfare consequences are not identified for the visible animals but the presence of relevant stressors can be identified. In other words, stressors (high temperature, for example) are present but the visible animals don't show visible signs of stress (panting, for example). Page 8, lines 39-40 this is contradictory to the statement at page 6, lines 23-24 Page 9, lines 1-2 please specify what Efsa means with 'transport practices acceptable?' and with 'a risk manager?'. The function of Efsa in a way is to distinguish when transport practices are acceptable or not, under the animal welfare point of view. Page 9, line 7-10 please extend the assessment covering the journey up to the unloading of animals at places of destination and not only at the port, in 3rd countries. The journey ends when the last animal is unloaded at the destination place, which is not the port, but the stable/assembly centre/slaughterhouse, exactly like in the following case of lines 11-13.</p>	<p>Not applicable/no need/no comment</p>
<p><b>57</b></p>	<p>Out of scope</p>	<p>Page 7, lines 31-34 Not only risks regarding microclimatic conditions will be considered. Efsa will identify practical difficulties and insufficient information causing animal welfare consequences, criteria to prevent them and detailed animal-based measures, as said at page 4 in the introduction.</p>	<p>Not applicable/no need/no comment</p>
<p><b>58</b></p>	<p>In the scope</p>	<p>Point 5, line 26, page 9 include transport of piglets Point 7, lines 29-30, page 9 include transport by RO-RO ferry</p>	<p>Unweaned piglets are transported in such low numbers that they were not prioritized. Newly weaned pigs are dealt with briefly but priority was given to pigs that were transported in large numbers. In relation to RO-RO ferries, this was not a specific scenario requested by the EC and priority was given to ruminants in this respect.</p>
<p><b>59</b></p>	<p>In the scope</p>	<p>Page 9, line 36 Please find description of difficulties and insufficient information concerning the seven industry specific transport practices listed by Efsa in the attached PDF document. Page 9, line 37 Include among relevant factors in brackets, also new environment, hierarchic behaviors, animal breed, presence of horns, state of pregnancy, presence of long fleece</p>	<p>For the specific industry practices (specific scenarios) listed in the mandate, EFSA examines selected welfare concerns (defined as an area or a topic to which special attention should be given in order to potentially avoid WCs), and, where possible, suggests recommendations. Please see conclusions and recommendations detailed in the five welfare during transport opinions. Many of the conclusions for road transport overlap with those of the specific scenarios. Some issues identified fall under the realm of risk management and have therefore not been addressed in the current welfare during transport opinions.</p>

<p><b>60</b></p>	<p>In the scope</p>	<p>Page 4 lines 14-18. When identifying hazards leading to welfare consequences during transport, Animals? Angels would like to stress that the fundamental underlying cause of hazards should not be ignored. As animals are sentient beings and transport is always interconnected with stressors (FAO, 2001), welfare problems during transport are unavoidable. A comprehensive identification of the hazards leading to welfare consequences must inevitably include a profound analysis of the circumstances which enable the transportation of living ?farm? animals on a commercial and profitable scale in the first place. Efsa must consider that not all welfare consequences are measurable and visible, especially for inspectors carrying out road-side controls, who cannot take blood samples, who can?t even inspect all animals individually, due to the high numbers, who can?t adequately assess animals confined in cages and single stalls and who have to act quickly. Efsa should state which stressors may have a relevant impact on animal welfare even though animals may not show visible signs of discomfort or when it is not possible to see them. Page 4, lines 22-23 point 1 must include lambs and unweaned calves too Page 4, lines 28-29 point 3 must include the transport of pigs too Page 4, lines 30-31 point 4 must include also end of career ewes Page 4, lines 32-34 point 5 must consider all unweaned animals or at least lambs, kids, and piglets too Page 4, after lines 22-37. Industry transport practices of concern to add to the 7 listed by Efsa: 8: transport of unfit and pregnant animals 9: transport of birds and rabbits 10: long transports carried out with one driver or insufficient number of drivers 11: construction and use of inappropriate, unsafe vehicles 12: untrained drivers 13: live transports despite too hot or too cold temperatures causing suffering to animals 14: transport of animals with insufficient space to ensure their minimum well being 15: inadequate plausibility check</p>	<p>Please see section 4.2.2 in the opinions for content on Animal-based-measures per welfare consequence. A complete assessment of the hazards present in each welfare consequence was included in each transport phase on the opinions. All areas have been covered in the opinions where feasible. There was little data on some groups or categories of some animals. Some issues highlighted cover areas that are not within the expertise of animal welfare experts.</p>
<p><b>61</b></p>	<p>Out of scope</p>	<p>Svenska Djurskyddsföreningen agrees with the European Commission about the importance of a scientific opinion from EFSA concerning the protection of terrestrial animals during transport.</p>	<p>Not applicable/no need/no comment</p>
<p><b>62</b></p>	<p>Out of scope</p>	<p>As described above, our opinion is that long distance transportation of unweaned animals, especially by "Roll-on Roll-off" ferry, is not possible to comply with the legislation due to practical difficulties.</p>	<p>Not applicable/no need/no comment</p>
<p><b>63</b></p>	<p>Out of scope</p>	<p>The above given comments apply mainly to transport practices #3. ?Roll-on-roll off? and #5. ?Unweaned calves?. We want to inform EFSA about the animal welfare problems that we have observed in these areas and that we therefore want all long journeys of unweaned animals, not only calves, to be prohibited in the EU.</p>	<p>Not applicable/no need/no comment</p>

64	In the scope	Svenska Djurskyddsföreningen has, together with other animal welfare NGOs in the EU, followed the transport of unweaned calves within the EU, particularly from Ireland to the European continent. Judging from our own observations and the observations of our NGO-partners in other countries, we think that long distance transports (more than 8 hours) of unweaned animals should not be allowed at all within or out of the EU. The practical problems associated with long animal transports, combined with vital needs of such young animals, makes it impossible to fulfill today´s requirements of Council Regulation (EC) No 1/2005.	Please see section on the transport of unweaned calves, including conclusions and recommendations.
65	Out of scope	Some transporters are taking responsibility and acting accordingly. Hunland is a major transporter of livestock based in Hungary and also have beef and dairy farms. They have just announced that they will no longer transport unweaned calves. They say "you should not transport hungry unweaned calves that you cannot feed. In our opinion unweaned calves should not be transported over nine hours.? They have stated that if they get requests to transport unweaned calves over long distances they will decline. With regard to sea journeys there can be no guarantee of welfare. Many sea vessels they are very old, converted cargo vessels. The vessels often leave in stormy conditions despite the fact they have stability issues with roll periods of less than 15 seconds meaning they will roll and pitch excessively when hitting winds of gale force 6 or above, which happens frequently. Despite claims by some stakeholders, veterinarians do not travel with the shipments outside the EU and there is no documentation up to final destination. In 2020 one vet accompanied a shipment but disembarked at a Spanish port. The competent authority is responsible for ensuring Regulation 1/2005 is enforced up until the final destination i.e. the farm or feedlot, but this is not taken seriously.	Not applicable/no need/no comment
66	Repetition	Svenska Djurskyddsföreningen has, together with other animal welfare NGOs in the EU, followed the transport of unweaned calves within the EU, particularly from Ireland to the European continent. We have learnt how these transports are carried out in practice, not in theory, and hope that these experiences can be helpful to EFSA in their assignment to describe relevant welfare consequences and to provide recommendations to prevent, mitigate or correct the welfare consequences.	Not applicable/no need/no comment

67	Out of scope	<p>The first responsibility of transporters, exporters and competent authorities is to ensure that Regulation 1/2005 is fully adhered to. For unweaned animals, this is particularly important in regard to feeding times as they are very vulnerable. All the basic needs of the animals must be met and health and welfare maintained throughout the whole journey up until the final destination, including up to slaughter when going outside the EU. Our observations and the observations of our NGO partners have shown that e.g. the export of unweaned calves from Ireland is not being conducted in line with the Regulation as calves are going between 24 and 30 hours with no feed. The Regulation permits that unweaned calves are transported for longer than eight hours if they after 9 hours of travel are given a rest period of at least one hour, are given water and if necessary feed. After this rest period, they may be transported for a further nine hours after which they must be unloaded, fed and watered. Feed for unweaned calves is milk replacer and it is not possible to feed the calves without unloading ? they have to be fed individually and as there are around 300 calves spread over three tiers in a truck it is not possible for the driver to access them. The ferry journey alone from Ireland to Cherbourg takes 18 hours. Add the couple of hours at least on either end and we're now looking at 24 hours with no feed, often more. It is common to see trucks at the ports 4 or 5 hours before the ferry departure time. Our partners have seen journey logs showing calves being loaded at 12:30 midday and the ferry left at ten that evening. It is best practice to feed calves 3 hours before transport as they need to relax to digest the feed. If those calves were fed 3 hours before loading that means a gap of 11.5 hours with no feed before even getting on the ferry. There is no doubt that leaving a 15 day old calf over 30 hours with no feed will cause harm and suffering.</p>	Not applicable/no need/no comment
68	Out of scope	Unweaned animals, transport by sea, Roll-on-roll off	Not applicable/no need/no comment
69	In the scope	<p>Dear Sir or Madam, please open the description documents attached, i.e. the file "EFSA Public consultation feedback.docx" in the attached zip-file "EFSA.zip" which contains the description to all provided material and suggestions thank you kind regards Gunter Pannwitz</p>	<p>The approach taken in this area was to identify the temperatures for the onset of mild heat stress and severe heat stress. Please see the details in the 5 transport opinions. The maintenance and recording of the temperature inside a transport vehicle is a complex issue that requires further specific research, as expressed in the recommendations of the opinions.</p>
70	Out of scope	<p>Our statement lays its focus on bovines (cattle and calves). However, the basic considerations are of course also applicable to other animal species.</p>	Not applicable/no need/no comment

71	In the scope	In our statement, we provide arguments on the most urgent points identified through the experience of veterinarians dealing with animal transport and Reg (EC) No 1/2005. Those are: Replacement of the transport of live animals; animals with physiological weaknesses; journey times and intervals; improvements in implementation; space conditions and approval of vehicles; and implementation, enforcement, and sanctioning.	Please see the conclusions and recommendations of the welfare during transport mandates. Where possible, the assessment leads to the establishment of recommendations on quantitative thresholds for microclimatic conditions within means of transport (maximum temperature), and to spatial thresholds (minimum space allowance). In addition, the development of welfare consequences over time is assessed in relation to maximum journey duration. Some of the points identified related to implementation or areas that are outside the expertise of animal welfare experts.
72	NA	Concerning the transport of calves, we provide a position paper which gives a veterinary assessment.	File was inaccessible or corrupt.
73	Out of scope	The German Federal Chamber of Veterinary Surgeons (Bundestierärztekammer e. V., BTK) considers a fundamental revision of Regulation (EC) No. 1/2005 to be urgently necessary. Despite good approaches, the provisions of the Regulation often fail to ensure animal-friendly transport. Time and again, long-term transports show that the imponderability of transport conditions adverse to animal welfare increases with the duration of a transport. After consideration of different interests and the protection of the animals, BTK considers the following demands to be necessary, with selected examples concerning the transport of calves being substantiated in more detail: 1. In principle, wherever possible the transport of live animals should be replaced by the transport of meat and meat products or semen and embryos. 2. The age limit for "animals that present physiological weaknesses" must be revised on the basis of veterinary criteria. 3. Journey times, including intervals for watering, feeding, and resting, need to be revised and the possibility of repeating any number of transport intervals needs to be limited. 4. Improvements in implementation are needed with regard to decision-making channels and conditions for the approval of long-term transports. 5. The space conditions (height etc.) as well as the equipment of the vehicles must be updated on the basis of the latest scientific findings. 6. Implementation, enforcement, and sanctioning must be improved.	Not applicable/no need/no comment
74	Out of scope	Labor laws can be opposed and force the driver to stop and take a break even if it is not good for the calves.	Not applicable/no need/no comment
75	Out of scope	Animal transport Guides remind the best practices of the professionals. They were redacted with the European commission. The birth and fattening ponds may not match in several regions of the EU. Long-distance transport makes it possible to give an future to these animals, which find no market in their region of birth.	Not applicable/no need/no comment

<p><b>76</b></p>	<p>Out of scope</p>	<p>Knowles and al. (1997, 1999) has shown that feeding the calves at half journey procured a little advantage on their well-being at the arrival. Whereas the loading and unloading are a true negative impact for the well-fare of the calves. He concluded it was better to finish quickly the journey than done a break for feeding. Todd et al (2000) and Fisher and al (2014) have demonstrated that diet during 12 hours didn't have impact on calves health. Knowles, T. G., Brown, S. N., Edwards, J. E., Phillips, A. J., Warriss, P. D. (1999). Effect on young calves of a one-hour feeding stop during a 19-hour road journey. <i>Veterinary Record</i>, 144(25), 687-692. <a href="https://doi.org/10.1136/vr.144.25.687">https://doi.org/10.1136/vr.144.25.687</a> Knowles, T. G., Warriss, P. D., Brown, S. N., Edwards, J. E., Watkins, P. E., Phillips, A. J. (1997). Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. <i>The Veterinary Record</i>, 140(5), 116-124. Todd, S. E., Mellor, D. J., Stafford, K. J., Gregory, N. G., Bruce, R. A., Ward, R. N. (2000). Effects of food withdrawal and transport on 5- to 10-day-old calves. <i>Research in Veterinary Science</i>, 68(2), 125-134. <a href="https://doi.org/10.1053/rvsc.1999.0345">https://doi.org/10.1053/rvsc.1999.0345</a></p>	<p>Not applicable/no need/no comment</p>
<p><b>77</b></p>	<p>Out of scope</p>	<p>Eicher (2001) remind the effect of age in the dairy calves give different reaction (lying or not). The weight is normally corelated with the age. In case of a long journey, parameter of weight for calves seem pertinent to decide if the calves can be transported. Eicher S. D., 2001, Transportation of Cattle in the Dairy Industry: Current Research and Future Directions, <i>Journal of Dairy Science</i>, Volume 84, Supplement, Pages E19-E23, ISSN 0022-0302, <a href="https://doi.org/10.3168/jds.S0022-0302(01)70192-0">https://doi.org/10.3168/jds.S0022-0302(01)70192-0</a>.</p>	<p>Not applicable/no need/no comment</p>
<p><b>78</b></p>	<p>In the scope</p>	<p>Currently, Regulation 1/2005 allows for the transport of animals until the 90% of the pregnancy stage. Pregnant animals during transport incur in several risks (e.g. metabolic diseases, weight loss, heat stress, dehydration, infection, risk of abortion, risk of early calving). Therefore it would be good for EFSA to add under group 1 of the ToR "pregnant bovines, swine, ovines". Additionally, it would be good to also assess fish welfare during transport. In 2011 the Commission reported that the lack of detailed rules created difficulties in implementing the Regulation ?in particular farmed fish?. This leads to differing interpretations of the rules, market distortions, and difficulties for operators. Attached are three reports that contain information on practical difficulties, or insufficient information in ensuring the welfare of animals, for the transport practices outlined in the ToR and in this comment.</p>	<p>Please see section on the preparation of transport in the welfare of transport opinions where pregnancy was addressed for each species. The transport of fish is out of the scope of the current mandate.</p>

<p><b>79</b></p>	<p>Out of scope</p>	<p>At present, organisers, farmers and certain slaughterhouses shield themselves from possible animal welfare sanctions, placing this responsibility on the transport logistics operator. Transport logistics operators are directly blamed for injuries to animals. These injuries cannot be imputed directly to the transporter or operator without a study of the background of the animals. This is why, if the transport has been carried out guaranteeing all the parameters required by the European Regulation, injuries to the animals cannot be caused directly by the transporter, unless the driver drives aggressively or loads the animals incorrectly. It should be noted that the driver of the vehicle must not have contact with the animals at any time in order not to break the biosecurity of the chain. The driver should only organise and check the loading and unloading, avoiding contact with the animals except in exceptional cases. The driver cannot clearly assess all the animals that are loaded with a 20-hour course, as they often do not have the technical knowledge, and above all the experience, to assess certain animals that are likely to be unfit. For all these reasons, it should be considered that a veterinarian should be present at the loading of animals on farms until the last animal enters the lorry and that penalties should be imposed on all parties involved in the transport chain (farmer, organiser, slaughterhouse and transporter), taking into account various values such as the total number of animals loaded, journeys made, degree of seriousness of the infringements, etc. This type of penalty would ensure that all parties involved maintain animal welfare. More information can be found in the attached document "CO-RESPONSIBILITY SHARING IN TRANSPORT".</p>	<p>Not applicable/no need/no comment</p>
<p><b>80</b></p>	<p>Out of scope</p>	<p>Page 7 line number 6 It is desirable to improve the planning of vehicles unloading in port in order to reduce waiting times for trucks at the entrance of the ports. It would be important to digitise all live animal transport documents to speed up the entry of trucks for unloading onto vessels. In addition, it should be envisaged to penalise the organisers of the journeys when the waiting times of the animals on the lorries exceed a certain time at the port entrance. Page 7 line number 7 Very long journeys by road, where animals should be rested at a staging point, should take into account the logistics of the journey. Such as the number of animals to be transported and whether there is a possibility to move the animals by an alternative means other than road that benefits animal welfare. In addition, bilateral agreements should be considered to give priority to vehicles transporting live animals at third country borders. Page 7 line number 7 2. ?Export by road? - Transport of adult cattle, weaned calves and sheep over long journeys by road involving the use of facilities where animals are unloaded and reloaded (control posts, livestock markets) or when animals are kept in stationary vehicles for hours (exit points) including in third countries; Very long journeys by road, where animals should be rested at a staging point, should take into account the logistics of the journey. Such as the number of animals to be transported and whether</p>	<p>Not applicable/no need/no comment</p>

		there is a possibility to move the animals by an alternative means other than road that benefits animal welfare. In addition, bilateral agreements should be considered to give priority to vehicles transporting live animals at third country borders. Page 7 line number 11 The regulation considers them as non-bred horses. The reality is that farm-bred horses are animals that are used to the farm staff and are gregarious, so they should be considered as unbroken animals. They should be transported in small groups inside the container	
<b>81</b>	Out of scope	Page 6 line number 18 c. the conditions within the means of transport: space, microclimatic conditions, watering and feeding From the experience of transporters it can be said that temperature is important but it is not the only factor to be taken into account. Limiting journeys to ambient temperatures above 30°C during the journey is incorrect. If temperatures above 30°C are reached, transport can be carried out without endangering animal welfare, but several factors must be taken into account. Factors: - Relative humidity of the areas through which the vehicle will pass. Taking into account the thermal sensation of the animal. - Increase in surface area per animal depending on the species and the characteristics of the vehicle used (with or without ventilators, drinking troughs or cooling in the case of pigs). - Consideration of the air quality of the animals. CO2 and NH3 concentrations - Litter increase and type of litter to be used. - Obligation not to stop the vehicle during the journey by combined driving. Combined driving is when two drivers are in one lorry, allowing the drivers to take breaks while the other driver is driving. This allows the vehicle to circulate for a maximum of 21 hours, making only stops to swap drivers. This is covered by Regulation EC561/2006. Page 6 line number 19 d. the journey duration and its circumstances as well as the resting of animals in the vehicle being stationary or being unloaded. The rest periods for animals should be the same as those for drivers. Regulation 561/2006 states that when there is only one driver in the cab, the driver must take 45 minute breaks every four and a half hours of driving. This is why the rest of the animals should fit in with the rest times of the drivers, thus reducing the journey times of the animals. In addition, it would be important to make driving times for live animal transport more flexible as long as the destination is reached. Allowing driving time to be exceeded	Not applicable/no need/no comment
<b>82</b>	In the scope	Teagasc have prepared the attached document to outline the available information and scientific evidence relating to the welfare of un-weaned calves undergoing intra-community trade from Ireland via road and roll-on, roll-off ferry.	Please see the section on the transport of unweaned calves in the welfare of cattle during transport mandate.
<b>83</b>	Repetition	Teagasc have prepared this response for EFSA's public consultation requesting scientific opinion concerning the protection of terrestrial animals during transport. Teagasc (www.Teagasc.ie) is the national body in Ireland providing integrated research, innovation and advisory services to the agricultural and food industries. We have researchers and technologists engaged in research projects in the area of animal welfare, specifically in pigs, cattle, dairy cows and calves. Our focus in	This is a partial repeat of comment 82.

		<p>this response is on the welfare during transport of un-weaned calves by road and ?roll-on roll-off? ferry. Ireland exports un-weaned, mostly male dairy calves via intra-community trade (I-CT) to veal markets on the continent. The calves are between two and six weeks old. The total journey time for the calves is around 60 hours depending on the destination. The majority of un-weaned calves are sold to farms in either the Netherlands or Spain. A typical journey from a source farm in Ireland to a destination farm is outlined in Figure 1.</p>	
<b>84</b>	NA	no.	Not applicable/no need/no comment
<b>85</b>	NA	no.	Not applicable/no need/no comment
<b>86</b>	Out of scope	<p>In the section where an introduction is given, we miss the most important point within the discussion around animal transportation. It should be mentioned that animal transportation is a precondition for animal marketing, breeding progress and thus at least basis for the human supply reliability with animal products. The importance of animal transport for the EU value chain. The quality of animal transport is more important than the distance It is important do make the difference between: 1. animal transportation to slaughter 2. animal transportation of farm animals in the EU. Here the differences between countries (for instance temperature) as well as the structural situation in term of assembly points (here the differentiation between assembly points and control posts is important and necessary) 3. animal transportation in third countries. For this point the need of genetic exchange, development of populations and supply reliability in third countries as well as the questioning around the control posts.</p>	Not applicable/no need/no comment
<b>87</b>	Repetition	<p>Currently, Regulation 1/2005 allows for the transport of animals until the 90% of the pregnancy stage. Pregnant animals during transport incur in several risks (e.g. metabolic diseases, weight loss, heat stress, dehydration, infection, risk of abortion, risk of early calving). Therefore it would be good for EFSA to add under group 1 of the ToR "pregnant bovines, swine, ovines". Additionally, it would be good to also assess fish welfare during transport. In 2011 the Commission reported that the lack of detailed rules created difficulties in implementing the Regulation ?in particular farmed fish?. This leads to differing interpretations of the rules, market distortions, and difficulties for operators. Attached are three reports that contain information on practical difficulties, or insufficient information in ensuring the welfare of animals, for the transport practices outlined in the ToR and in this comment. Difficulties due to lack of provisions in the Regulation and no EFSA Opinions on the transport of cats and dogs result in compromised welfare and potential health risks. This leads to Single Market distortions and no level playing field for operators. Difficulties resulting from criteria of the Regulation that are incomplete (the Regulation does not provide sufficient provisions to ensure the fitness of equines for transport) or unfit for purpose (the derogation for long</p>	This is a repeat of comment 78.

		and very long journeys is incompatible with ensuring the welfare of equines, registered horses exempt from a variety of provisions).	
<b>88</b>	In the scope	Inherent problems in the trade, compounded by widespread breaches of Reg 1/2005: Long journeys to ports with risks of delays, seasonal temperature extremes, & accidents. Queues of vehicles sometimes for hours outside ports, which are unlikely to have lairage or unloading facilities. Many vessels not designed for animal transport. Animals forced to move from daylight into a dark deck, causing them to balk. Animal suffering increased by use of sticks and electric prods on them. Passageways may be too steep and there may be protrusions and gaps that risk causing injuries. CAs must inspect animals for fitness for transport before loading onto vessels. Lack of lairage means inspection often done while animals are being rushed from truck to ship, where they cannot be inspected fully. Boarding permitted although some vessels fail mandatory check, sometimes, as reported by the EC, under 'intense pressure from exporters'. Once animals on a ship leave the EU, they are in a legal void without anyone on board with clear legal responsibility for their welfare. Live exports by sea have been shown to be so dangerous for animals that New Zealand is ending its live exports trade. EU-Turkey border: A 2017 Commission report indicates that for around 3 months of the year transporters cannot comply with the maximum temperatures laid down by Reg1/2005. Mixing of unfamiliar animals: poor welfare and disease risk. Milk replacer cannot be provided to unweaned calves on board a truck. Scotland has acknowledged this and ended live calf exports. EU company Hunland will stop transporting calves younger than 3 months old. Unweaned animals should not be subjected to long-distance transport or live exports. 'End-of-career' animals: The phrase 'End-of-career' is inappropriate here. To protect their welfare, such animals should be slaughtered humanely on farm. EU should end the archaic trade in long-distance transport and export of animals without delay. Details: See attached	The scientific assessment carried out by EFSA takes two forms. Firstly, for road transport practices, which is the most common transport practice, the transport stages are described and assessed in terms of welfare consequences (WCs), animal-based measures (ABMs) and hazards leading to the WCs. In addition, recommendations to prevent hazards and mitigate/correct WCs are provided. The preventive measures relate to the hazards, and the corrective/mitigation measures refer to the WCs. Where possible, the assessment leads to the establishment of recommendations on quantitative thresholds for microclimatic conditions within means of transport (maximum temperature), and to spatial thresholds (minimum space allowance). In addition, the development of WCs over time is assessed in relation to maximum journey duration. While the Scientific Opinion mainly focuses on road transport, there are specific sections dealing with the following means of transport: Roll-on roll-off ferries (RO-RO), livestock vessels, air and rail. For the specific industry practices (specific scenarios) listed in the mandate and mentioned in your document, EFSA examines selected welfare concerns (defined as an area or a topic to which special attention should be given in order to potentially avoid WCs), and, where possible, suggests recommendations. Please see those sections of the opinions, the conclusions and recommendations detailed in the five welfare during transport opinions.
<b>89</b>	In the scope	' We request that EFSA adds transport of pregnant animals to its group 1 of the ToR ' We request assessment of fish welfare during transport.	Please see sections on the preparation of animals for transport in the four opinions related to welfare of cattle, sheep & goats, pigs and horses during transport.
<b>90</b>	Out of scope	Information from our transport provider companies Management of transport time: take into account the number of farms to be delivered. Unloading times Modernization of trucks, especially for air-conditioned trucks: what to do in the event of a power failure	Not applicable/no need/no comment

<p><b>91</b></p>	<p>In the scope</p>	<p>For the introduction we have comments on six of the seven specific transport practices identified by the European Commission as presenting practical difficulties or with insufficient information. In several of these practices equines have been omitted from the list of species.</p>	<p>The scientific assessment carried out by EFSA takes two forms. Firstly, for road transport practices, which is the most common transport practice, the transport stages are described and assessed in terms of welfare consequences (WCs), animal-based measures (ABMs) and hazards leading to the WCs. In addition, recommendations to prevent hazards and mitigate/correct WCs are provided. The preventive measures relate to the hazards, and the corrective/mitigation measures refer to the WCs. Where possible, the assessment leads to the establishment of recommendations on quantitative thresholds for microclimatic conditions within means of transport (maximum temperature), and to spatial thresholds (minimum space allowance). In addition, the development of WCs over time is assessed in relation to maximum journey duration.</p> <p>While the Scientific Opinion dealing with the welfare of horses during transport mainly focuses on road transport, as it is the most common form of transport, there are also specific sections dealing with the following means of transport: Roll-on roll-off ferries (RO-RO), air and rail. For the transport of horses to slaughter, EFSA examines selected welfare concerns (defined as an area or a topic to which special attention should be given in order to potentially avoid WCs) in addition to those already identified during the road transport of horses in general, and, where possible, suggests recommendations.</p>
<p><b>92</b></p>	<p>Out of scope</p>	<p>On this point we provided a non-comprehensive list of practical difficulties found with the current Regulation. Moreover, we provided a detailed explanation of the use of allostasis to assessing the overall wear and tear on equines during transport, as well as listed some preventive measures to reduce the allostatic load on equines during transportation.</p>	<p>Not applicable/no need/no comment</p>
<p><b>93</b></p>	<p>Out of scope</p>	<p>The attached document, which covers points 1 and 2 of this section, includes an introduction to the main welfare hazards affecting equines before, during and after transport; main practical difficulties identified; key recommendations for mitigation and improvement of equine welfare by revisions to the EU legislation on live animal transport; and areas which require further evidence and research. We are not providing any data as requested in section 4 point 3.</p>	<p>Not applicable/no need/no comment</p>

<p><b>94</b></p>	<p>Out of scope</p>	<p>On this point we highlighted the importance to review, not only available scientific publications, including the latest scientific opinion by the EFSA which were not included into the Council Regulation 1/2005, but also other sources that provide a sound scientific basis for future legislative proposals. For equines these include the Practical Guidelines on the Watering of Equine Animals Transported by Road, the Practical Guidelines to Assess Fitness for Transport of Equidae (Horses, Ponies, Donkeys and their Hybrids) and the Guide to good practices for the transport of horses destined for Slaughter. As well, we have highlighted missing information regarding equine welfare hazards during transport such as the length of the journey, the preparation for transport, the conditions within the means of transport, the human factor, etc.</p>	<p>Not applicable/no need/no comment</p>
<p><b>95</b></p>	<p>Repetition</p>	<p>We have not identified any other transport practices. Regarding the practical difficulties, operators organize themselves to guarantee animal welfare. Indeed, the animals must be well transported for the transporter to be paid. All long-distance trips use trucks equipped with fans and record the temperature in the animals' cabins. A sensor alerts the driver if the temperature is too high. The operator can then activate the fans to reduce the temperature. The operators do not hesitate to reduce the recommended density. Animal welfare is at the heart of our pre-occupation, at the national level a label of social responsibility has been created by our federation: QUALI NEGOCE, a strong commitment. At the French level, transport during orange or red heatwave alerts is stopped between 1pm and 6pm. Operators modify their schedules during hot weather to ensure the well-being of the animals.</p>	<p>This is a repeat of comment 39.</p>
<p><b>96</b></p>	<p>Out of scope</p>	<p>Regarding the documents made available to professionals to guarantee animal welfare, we would like to remind you that good practice guides have been produced with the professional unions "animal transport guide". For transport by sea, the majority of shippers provide a daily report on the temperature in the holds and the humidity.</p>	<p>Not applicable/no need/no comment</p>
<p><b>97</b></p>	<p>Repetition</p>	<p>We did not identify any other transportation practices. We identified 3 difficulties for export by ship and roll on, roll off: - Veterinarian availability. Exporters must accommodate veterinarians, which results in early departures from the center and waits at ports. - Customs. Some customs officers block trucks at the entrance to ports for no particular reason, which delays the loading of animals - The social regulations of the transport which can go against the animal welfare. Often the animals cannot be unloaded because the driver is on break. The inflexibility of the social regulations of transport leads to longer transport times. For road transport, we have identified a common difficulty with export, which is the inflexibility of the social regulations of transport, which generally lengthens the transport time of animals.</p>	<p>This is a repeat of comment 40.</p>

<b>98</b>	Repetition	We have identified 3 difficulties for export by ship and roll on, roll off: - Veterinarian availability. Exporters have to adapt to the vets, which leads to early departures from the center and waiting at the ports. - Customs. Some customs officers block trucks at the entrance to ports for no particular reason, which delays the loading of animals - The social regulations of the transport which can go against the animal welfare. Often the animals cannot be unloaded because the driver is on break. The inflexibility of the social regulations of transport leads to longer transport times. For road transport, we have identified a common difficulty with export, which is the inflexibility of the social regulations of transport, which generally lengthens the transport time of animals.	This is a repeat of comment 40.
<b>99</b>	Out of scope	As a livestock trader, I am involved in your approach. What I can tell you is that our trade is carried out by professionals trained in working with animals, which is why our federation has created a label called "qualinegoce", where animal welfare is a major part of it. I myself transport the animals that I sell and my vehicles are equipped with temperature sensors, drinking fountains, ventilators and GPS tracking so that they can always be located and tracked by the competent authorities.	Not applicable/no need/no comment
<b>100</b>	Out of scope	The difficulties that I encounter are during the breaks of the drivers the animals can remain 45 minutes at the complete stop whereas 3 times 15 minutes would be enough, a derogation would be necessary to improve the conditions of transport of the animals	Not applicable/no need/no comment
<b>101</b>	Repetition	The difficulties that I encounter are during the breaks of the drivers the animals can remain 45 minutes at the complete stop whereas 3 times 15 minutes would be enough, a derogation would be necessary to improve the conditions of transport of the animals	Not applicable/no need/no comment
<b>102</b>	Out of scope	The EC mandate to EFSA specifies that EFSA should consider the available scientific literature and possibly other sources. The nature of the information from "other sources" should be specified, as without a scientific basis, such information should not be admissible for making legal decisions on animal welfare, animal health.	Not applicable/no need/no comment
<b>103</b>	Out of scope	Scientific knowledge must be regularly updated as the new evidence is crucial for drafting new legal provisions. Sources of scientific evidence must be reliable, and new scientific evidence should be developed.	Not applicable/no need/no comment
<b>104</b>	Out of scope	Good practice guides have been worked on and shared at European level through the "Animal Transport Guide" project commissioned by the European Commission in 2015. This good practice guides are based on scientific knowledge and publications as well as on information gathered from stakeholders.	Not applicable/no need/no comment
<b>105</b>	Out of scope	The seven scenarios are defined as "specific industry practices". But the main of them have no link to industry and these activities are inherent to the farm sector. That's why this mention should be replaced by "specific livestock trade practices".	Not applicable/no need/no comment

<p><b>106</b></p>	<p>Out of scope</p>	<p>The expression "industry practices" should be replaced by "livestock trade practices". The impact of loading and unloading of animals in animal welfare in the stops, and the impact of variation factors regarding animal welfare are not already identified. The administrative burden to ensure compliances with the legislation is so high that sometimes it might risk perse the welfare of the animals. There are insufficient information about preparation of animals for transport other than suitability (facilities, handling, feeding, physical condition..). The existing practical difficulties are: - the availability of veterinary (official veterinarians want be present at the time of loading trucks, but they are not always available. Most time operators begin their way before and thus, animals must wait unnecessarily in the port) ; - customs restrictions (customs makes the trucks wait at the entrance of the port because of delays in the controls and it's very difficult to predict); - incompatibility between the Regulation 1/2005 and the directives that regulates the driving time of drivers. ( it can happen that drivers are forced to take a break while they are almost at destination, or even sometimes already within the confines of the destination but not at the exact location of the unloading site. In this case, the truck has to stop, which prevents the animals from being unloaded and thus prolongs the duration of the transport for the animals.). Only ?recorded data? must have been obtained in a legal way and its origin (place and date) must be certified by a competent authority and after agreement of the relevant operator.</p>	<p>Not applicable/no need/no comment</p>
<p><b>107</b></p>	<p>Out of scope</p>	<p>The transport of live animals is regulated by EC Regulation 1/2005, which to date is still the only provision in force throughout Europe. In Italy, in addition to EC Regulation 1/2005, the transport of live animals is regulated by Legislative Decree n. 151 of July 25, 2007, "Sanctioning provisions for the violation of Reg EC 1/2005 on the protection of animals during transport and related operations". As CNA we believe that the Italian legislation is already very strict in ensuring the proper welfare of the animal during transport. We also note an important burden of responsibility on the haulier who has a high interest, also economic, to limit the stress of the animal during the journey and to ensure that the animal arrives healthy at destination. For this reason we believe that, in the revision of the regulations, it is necessary to understand the very different national situations in the various Member States.</p>	<p>Not applicable/no need/no comment</p>
<p><b>108</b></p>	<p>Out of scope</p>	<p>As a professional, animal welfare is at the center of my concerns. Indeed, a well transported animal is equal to a paid animal. Moreover, at the level of my federation, we have set up a label of social responsibility with 4 major axes, including one very present on animal welfare and biosecurity.</p>	<p>Not applicable/no need/no comment</p>
<p><b>109</b></p>	<p>Out of scope</p>	<p>As far as difficulties are concerned, I have identified that the social regulations of transport can go against animal welfare. In some cases, the animals cannot be unloaded because the drivers are on break. Thus, the non-flexibility of the social regulation of transport leads to longer transport times.</p>	<p>Not applicable/no need/no comment</p>

<b>110</b>	Out of scope	As far as difficulties are concerned, I have identified that the social regulations of transport can go against animal welfare. In some cases, the animals cannot be unloaded because the drivers are on break. Thus, the non-flexibility of the social regulation of transport leads to longer transport times.	Not applicable/no need/no comment
<b>111</b>	In the scope	see attached file	<p>The scientific assessment carried out by EFSA takes two forms. Firstly, for road transport practices, which is the most common transport practice, the transport stages are described and assessed in terms of welfare consequences (WCs), animal-based measures (ABMs) and hazards leading to the WCs. In addition, recommendations to prevent hazards and mitigate/correct WCs are provided. The preventive measures relate to the hazards, and the corrective/mitigation measures refer to the WCs. Where possible, the assessment leads to the establishment of recommendations on quantitative thresholds for microclimatic conditions within means of transport (maximum temperature), and to spatial thresholds (minimum space allowance). In addition, the development of WCs over time is assessed in relation to maximum journey duration.</p> <p>While the Scientific Opinion mainly focuses on road transport, there are specific sections dealing with the following means of transport: Roll-on roll-off ferries (RO-RO), livestock vessels, air and rail. For the specific industry practices (specific scenarios) listed in the mandate, EFSA examines selected welfare concerns (defined as an area or a topic to which special attention should be given in order to potentially avoid WCs), and, where possible, suggests recommendations. The specific welfare concerns mentioned in your document were addressed in the opinions. Please see conclusions and recommendations detailed in the five welfare during transport opinions.</p>
<b>112</b>	In the scope	see attached file	<p>Please see comments above on the approach taken by the working group in the delivery of the five opinions on the welfare of animals during transport. Please see the conclusion and recommendations in the five opinions. There are however, issues that fall outside the remit of these mandates. Some are simply implementation, others are philosophical or ethical.</p>

			Some of the issues mentioned in your document have been highlighted in the opinions as a welfare concern but did not lead to recommendations for the reason given above.
<b>113</b>	In the scope	see attached file	Please see previous comments on the methodology and approach taken by EFSA in the five opinions. Please see the relevant sections in the opinions. Some issues fall outside the area of expertise of animal welfare experts (implementation of rules or ethical issues, for example).
<b>114</b>	In the scope	<p>Currently, Regulation 1/2005 allows for the transport of animals until the 90% of the pregnancy stage. Pregnant animals during transport incur in several risks (e.g. metabolic diseases, weight loss, heat stress, dehydration, infection, risk of abortion, risk of early calving). Therefore it would be good for EFSA to add under group 1 of the ToR "pregnant bovines, swine, ovines". Additionally, it would be good to also assess fish welfare during transport. In 2011 the Commission reported that the lack of detailed rules created difficulties in implementing the Regulation ?in particular farmed fish?. This leads to differing interpretations of the rules, market distortions, and difficulties for operators. Attached are three reports that contain information on practical difficulties, or insufficient information in ensuring the welfare of animals, for the transport practices outlined in the ToR and in this comment. Difficulties due to lack of provisions in the Regulation and no EFSA Opinions on the transport of cats and dogs result in compromised welfare and potential health risks. This leads to Single Market distortions and no level playing field for operators. For detailed recommendations on cats and dogs transport, see the EU Platform on Animal Welfare - Guidelines attached.</p> <p>Regarding equines, the below comments refer to point 2.2 (ToR) group 1 point 1 and to practices listed under point 2.2.2 point 6: Difficulties resulting from means of transport incompatibility (horses unable to maintain balance, no partitions) and journey time (incompatible with watering and feeding needs) with physiological needs; Difficulties resulting from criteria of the Regulation that are incomplete (the Regulation does not provide sufficient provisions to ensure the fitness of equines for transport) or unfit for purpose (the derogation for long and very long journeys is incompatible with ensuring the welfare of equines, registered horses exempt from a variety of provisions).</p>	Please see previous comments on the methodology and approach taken by EFSA in the five opinions . Please see the relevant sections in the opinions. The transport of fish, cats and dogs is outside the remit of the mandate entitled the protection of animals during transport. Please see the opinion on the welfare of horses during transport.
<b>115</b>	Out of scope	The transport of farmed deer is not included in the list. Although less numerous than the other farmed species mentioned, deer pose very specific problems when it comes to transport, such as being non-domesticated and, in some cases, having antlers. The HSA recommends that farmed deer be included in the Scientific Opinion concerning the protection of terrestrial animals during transport.	Not applicable/no need/no comment

<p><b>116</b></p>	<p>Out of scope</p>	<p>In point a) the preparation for transport, it is not clear if and how fitness for transport is covered. In the United Kingdom, which until recently formed part of the EU, the number of farmed livestock deemed unfit for transport outnumbers those animals injured as a result of transport means and practices, by more than thirteen to one (FAWC, 2019). We expect this level to be similar to that seen in the EU. One of the problems associated with this is the lack of specific definitions of fitness for transport for different species. It also needs to be made clear who is responsible for the state of the animal at all stages of a journey. The loading of slaughter animals at the farm is a very important timepoint for the welfare of those animals, as their fitness for transport is pivotal for their welfare during the subsequent journey. It is also a practice where it can be difficult to assess the fitness of individual animals due to many animals being loaded simultaneously and relatively fast and, in winter, often in darkness. The people carrying out the loading represent entities that are economically involved (producer and hauling company), which may compromise the ability of the receiving entity (the driver) to refuse an animal due to its reduced fitness. The competence of individual drivers to assess animal fitness may also vary greatly. The HSA recommends that animal fitness-for-transport is covered specifically and thoroughly in the Scientific Opinion. Reference cited: FAWC (2029). Opinion on the Welfare of Animals during Transport. Published by the Farm Animal Welfare Committee, United Kingdom. 439 pp.</p>	<p>Not applicable/no need/no comment</p>
<p><b>117</b></p>	<p>In the scope</p>	<p>The HSA is aware that the list of seven specific transport practices have been defined by the European Commission, and not singled out by EFSA, with the first and second focused on export. Live animal export may be shorter, both in distance and duration, than many journeys undertaken within the boundaries of a single nation. We would like to take this opportunity to advise against putting a lot of emphasis on export, as the welfare of animals being transported is related to their fitness and the quality of the journey, not the destination or purpose of the transport. The HSA acknowledges that movement of animals across borders, from or within the EU, is often coupled with a transfer of responsibility for the animal from one authority to another, and this may be associated with an increased risk of reduced animal welfare. If this is the reason for focusing on export, this should be made more explicit when EFSA responds to the first and second of the specific transport practices on the list. Among the end-of-career animals listed in the fourth specific transport practice, cull ewes (and to a lesser extent nanny goats) should be included, as these animals, although less numerous than the species already listed, are often in a poor state of health, may be collected from several farms and consequently driven quite far for slaughter. The low economic value of these end-of-career females makes them prone to be given less attention, in terms of transport quality, compared to more valuable livestock species and this,</p>	<p>As already described above, the scientific assessment carried out by EFSA firstly addresses road transport practices, there are specific sections dealing with the export of animals by road. For this, EFSA examines selected welfare concerns (defined as an area or a topic to which special attention should be given in order to potentially avoid WCs), and, where possible, suggests recommendations. Please see conclusions and recommendations detailed in the five welfare during transport opinions. Cull sheep and goats are dealt with in the context of preparation for transport.</p>

		combined with the poorer health of cull ewes, gives rise to severe welfare concerns.	
<b>118</b>	Repetition	Currently, Regulation 1/2005 allows for the transport of animals until the 90% of the pregnancy stage. Pregnant animals during transport incur in several risks (e.g. metabolic diseases, weight loss, heat stress, dehydration, infection, risk of abortion, risk of early calving). Therefore it would be good for EFSA to add under group 1 of the ToR "pregnant bovines, swine, ovines". Additionally, it would be good to also assess fish welfare during transport. In 2011, the Commission reported that the lack of detailed rules created difficulties in implementing the Regulation ?in particular for farmed fish?. This leads to differing interpretations of the rules, market distortions, and difficulties for operators. Attached are three reports that contain information on practical difficulties, or insufficient information in ensuring the welfare of animals, for the transport practices outlined in the ToR and in this comment. Regarding equines, the comments below refer to point 2.2 (ToR) group 1 point 1 and to practices listed under point 2.2.2 point 6: 1. Difficulties resulting from means of transport incompatibility (horses unable to maintain balance, no partitions) and journey time (incompatible with watering and feeding needs) with physiological needs; 2. Difficulties resulting from criteria of the Regulation that are incomplete (the Regulation does not provide sufficient provisions to ensure the fitness of equines for transport) or unfit for purpose (the derogation for long and very long journeys is incompatible with ensuring the welfare of equines, registered horses exempt from a variety of provisions).	Repeat of comment 114.
<b>119</b>	Out of scope	Some practical elements must be taken into account: - the availability of the competent authorities during the controls which can penalize the transport and cause unforeseeable delays (availability of the agent, working hours, coordination between State services) - it is also necessary to analyze the combination of multiple factors in addition to the duration of the transport: environment, light, noise, gazes	Not applicable/no need/no comment
<b>120</b>	Out of scope	Loading and unloading of animals in the stops should be taken into account as it's a source of stress for animals. Preparation of animals is also a key to a successful transport: for example french livestock markets have an official vet that chek the animals before they leave the market, but that assumes the availability of a veterinarian, which is not reproducibile on all the centers and farms of departure	Not applicable/no need/no comment

121	Out of scope	We fully agree with The Commission as scientific knowledge needs to be expanded especially on transport, and constantly updated. Several research projects are underway. Scientific knowledge must take into account the good practice guidelines of professionals and should not leave room for interpretation nor feelings. Current legislation should be analyzed and may only be improved on this scientific basis.	Not applicable/no need/no comment
122	Out of scope	An awareness was made, a few years ago on the animal welfare. Being part of my interprofession, I took part in exchanges on the subject with the NGOs of animal protection, thus the well-being is in the middle of my concerns. Moreover, being a regional representative, I made my members aware of this subject very early on. At the level of my federation, we have just created a label of social responsibility, named QUALI NEGOCE, with high stakes on animal welfare. I am involved in the deployment of this tool.	Not applicable/no need/no comment
123	Out of scope	NEPLUVI would like to thank EFSA for the opportunity to give input during the public consultation on the Request for a Scientific Opinion Concerning the Protection of Terrestrial Animals During Transport. Since this scientific opinion will also include an evaluation on animal welfare legislation, we would like to bring the following discussion to your attention. Transport of poultry to, amongst others, the slaughterhouse and its related activities fall under the scope of the Regulation (EG) no 1/2005. Currently, there has been a discussion in the Netherlands on the methods used to catch birds. In the Regulation (EC) no 1099/2009 an exception has been listed that it is allowed to catch birds by their legs, whereas this exception is missing in the Regulation (EC) no 1/2005.	Not applicable/no need/no comment
124	Out of scope	In the EFSA report in 2004, the following has been mentioned: ?The importance of careful handling is evidenced by differences in the amount of bruising in broilers harvested by different catching teams (Taylor and Helbacka, 1968), the implication being that some catchers are less skilled or less considerate than others. Birds should be lifted carefully. Ideally this should be by holding the body. However, it is more usual, if not universal, to catch and lift birds by their legs. Both legs should be used to lift the birds since this reduces the frequency and severity of haemorrhaging in the thigh (Wilson and Brunson, 1968). It also reduces the number of broken bones sustained.? As mentioned in the quote above, catching the birds by the legs is more than usual and happens in every country around the world. It is of utmost importance that the catching happens carefully. The current discussion that it is not allowed to catch birds by the legs according and asks for an immediate implementation. However, this deadline is not reasonable because there is no alternative method present to catch the birds. To adjust the method of catching, there should be time to look for alternative methods to do the catching without causing welfare consequences and time to educate and implement this new method. We want to ask EFSA to pay attention to the catching of poultry and this discussion in their Scientific Opinion.	Not applicable/no need/no comment

<p><b>125</b></p>	<p>Repetition</p>	<p>Pregnant animals are not included in the EFSA Opinion ToR. Currently, Regulation 1/2005 allows for the transport of animals until the 90% of the pregnancy stage. Pregnant animals during transport incur in several risks. Therefore it would be good for EFSA to add under group 1 of the ToR "pregnant bovines, swine, ovines". Additionally, fish are not covered in the EFSA Opinion ToR. In 2011 the Commission reported that the lack of detailed rules has created difficulties in implementing that Regulation for animal categories other than livestock and ?in particular farmed fish?. This leads to differing interpretations of the rules, market distortions, and difficulties for operators. Please find attached three reports that contain info on practical difficulties or insufficient information in ensuring the welfare of animals, for the transport practices outlined in the ToR and in the comments here above. Cats and dogs are not covered by any of the EFSA Opinions. Difficulties due to lack of provisions in the Regulation and no scientific EFSA Opinion on the transport of cats and dogs result in compromised welfare and potential health risks. This leads to Single Market distortions and no level playing field for operators. For detailed recommendations on cats and dogs transport please consult EU Platform on Animal Welfare - Guidelines on commercial movement of cats and dogs by land. Regarding equines, the below comments refer to point 2.2 (ToR) group 1 point 1 and to practices listed under point 2.2.2 point 6: 1. Difficulties resulting from incompatibility of means of transport (horses unable to maintain balance, lack of partitions) and journey time (incompatible with watering and feeding needs) with physiological needs; 2. Difficulties resulting from criteria of the Regulation that are incomplete or unfit for purpose.</p>	<p>This is a repeat of a previously made comment. Please see previous answers.</p>
<p><b>126</b></p>	<p>Out of scope</p>	<p>Regulation (EC) No. 1/2005 on the protection of animals during transport and related operations, sets out the minimum standards for the welfare of animals during transport. The Regulation applies to the transport of all live vertebrate animals for the purposes of scientific activity, including medicine and drug development for humans and animals. Our sector believes that the scientific breeding and research community works well within this framework to ensure there are few animal welfare issues encountered during transport. We transport many thousands of animals per year and there have been very, very few reports of problems during transport. The European Convention for the Protection of Animals during International Transport (Revised) also applies to the movement of live animals within the EU. The transport of live animals by air is governed by the Live Animals Regulations of the International Air Transport Association (IATA). CITES permits must also be obtained for all movements (import and export) of CITES listed species (such as non-human primates) between countries signed up to the Convention. Applying additional controls and limitations on the transport of these animals would not only increase the risks to their welfare and high health status, but it may hamper the ability of the biomedical sector to conduct</p>	<p>Not applicable/no need/no comment</p>

		potentially life-saving research and the development of drugs and vaccines for humans and animals.	
<b>127</b>	Out of scope	The transport of animals used for scientific purposes Safe and reliable transportation of animals used for scientific purposes by air, rail, road or sea is an essential element of medical, veterinary and scientific advancements across the globe. Without the ability to move research models and/or animals from one country or continent, to another, such as from a breeder to a research institution, or from one research institution to another, crucial scientific research and development for new drugs, treatments and vaccines will be delayed or will not be conducted in the EU. Researchers and medicines developers would prefer to access animals from breeding facilities close to their own facilities, but this is often simply not possible. The main reasons for transportation are: ? The animals required possess specialised anatomical, genetic and physiological conditions that differ from other members of the same species. For example, very specific genetically altered mice strains, susceptible to the virus, have been needed in Covid-19 research. ? Animals may often be sourced from purpose-bred colonies, which maintain certain attributes within the breeding group. This assists the quality and consistency of the study and may be a regulatory requirement (eg SPF animals), and can also reduce the numbers required. ? Transportation enables researchers to share genetically unique strains and to enhance collaboration. It also reduces the need to potentially overbreed commonly used strains. Reducing the options to transport and exchange animals used for scientific purposes with new regulations could lead to an increased number of breeding facilities. More breeding facilities could mean potentially the over-production of animals, since there will be a duplication of animals across countries.	Not applicable/no need/no comment
<b>128</b>	Out of scope	We consider that The Laboratory Animal Science Association (LASA) guidelines (Laboratory Animals ? Good transportation practice) provide clear guidelines for all species transported for scientific research programmes. It is a necessary reference document when planning and carrying out transportation of laboratory animals. This document highlights specific points to consider for the transportation of animals used for scientific purposes, including rodents (rats, mice, hamsters, gerbils and guinea pigs), rabbits, dogs, cats, ferrets, minipigs, non-human primates, Xenopus laevis and livestock species used in scientific research programmes. The LASA guidelines include details on the provision of food and	Not applicable/no need/no comment

		water, appropriate container sizes and environmental controls, and the transport of pregnant animals, all of which have been followed successfully for many years, without any major issues. This guidance is also supported by 3Rs centres like Norecopa and NC3Rs. We would be happy to meet officials from the European Food Safety Authority to discuss our submission and related scientific matters.	
<b>129</b>	Repetition	Regulations governing the transport of animals used for scientific purposes Regulation (EC) No. 1/2005 on the protection of animals during transport and related operations, sets out the minimum standards for the welfare of animals during transport. The Regulation applies to the transport of all live vertebrate animals for the purposes of scientific activity, including medicine and drug development for humans and animals. Our sector believes that the scientific breeding and research community works well within this framework to ensure there are few animal welfare issues encountered during transport. We transport many thousands of animals per year and there have been very, very few reports of problems during transport. The European Convention for the Protection of Animals during International Transport (Revised) also applies to the movement of live animals within the EU. The transport of live animals by air is governed by the Live Animals Regulations of the International Air Transport Association (IATA). CITES permits must also be obtained for all movements (import and export) of CITES listed species (such as non-human primates) between countries signed up to the Convention. Applying additional controls and limitations on the transport of these animals would not only increase the risks to their welfare and high health status, but it may hamper the ability of the biomedical sector to conduct potentially life-saving research and the development of drugs and vaccines for humans and animals.	This is a repeat of comment 126.
<b>130</b>	Out of scope	Although the request from the European Commission for a Scientific Opinion Concerning the Protection of Terrestrial Animals During Transport focuses almost exclusively on the transportation of farmed animals as part of the 'farm to fork' strategy, there are many animals that are transported annually across Europe to support scientific research programmes. It is important to recognise that a number of these species (particularly mice and minipigs) have been developed into highly specialised research models. Animals bred for scientific purposes are used for many reasons including; basic research to understand biological processes; development of new medicines and treatments for humans and animals; testing the safety of substances which might be dangerous to humans or the environment and for teaching. Laboratory animal transport is currently very well self-regulated, as it is essential that the animals are delivered in good health/condition on arrival, with no compromise to their welfare and health status, as otherwise they would be deemed scientifically unsuitable for use in research. The purpose of this note is a reminder that any changes to the EU Transport	Not applicable/no need/no comment

		Regulation recommended as a consequence of the current consultation exercises could significantly impact on access to animals for use in science.	
<b>131</b>	Repetition	This is a joint response by the European Animal Research Association (EARA), the European Federation of Pharmaceutical Industries and Associations (EFPIA), the Federation of European Laboratory Animal Science Associations (FELASA), and the European Society of Laboratory Animal Veterinarians (ESLAV). Although the request from the European Commission for a Scientific Opinion Concerning the Protection of Terrestrial Animals During Transport focuses almost exclusively on the transportation of farmed animals as part of the 'farm to fork' strategy, there are many animals that are transported annually across Europe to support scientific research programmes. It is important to recognise that a number of these species (particularly mice and minipigs) have been developed into highly specialised research models. Animals bred for scientific purposes are used for many reasons including; basic research to understand biological processes; development of new medicines and treatments for humans and animals; testing the safety of substances which might be dangerous to humans or the environment and for teaching. Laboratory animal transport is currently very well self-regulated, as it is essential that the animals are delivered in good health/condition on arrival, with no compromise to their welfare and health status, as otherwise they would be deemed scientifically unsuitable for use in research. The purpose of this note is a reminder that any changes to the EU Transport Regulation recommended as a consequence of the current consultation exercises could significantly impact on access to animals for use in science.	This is a repeat of comment 130.
<b>132</b>	Repetition	Safe and reliable transportation of animals used for scientific purposes by air, rail, road or sea is an essential element of medical, veterinary and scientific advancements across the globe. Without the ability to move research models and/or animals from one country or continent, to another, such as from a breeder to a research institution, or from one research institution to another, crucial scientific research and development for new drugs, treatments and vaccines will be delayed or will not be conducted in the EU. Researchers and medicines developers would prefer to access animals from breeding facilities close to their own facilities, but this is often simply not possible. The main reasons for transportation are: ? The animals required possess specialised anatomical, genetic and physiological conditions that differ from other members of the same species. For example, very specific genetically altered mice strains, susceptible to the virus, have been needed in Covid-19 research. ? Animals may often be sourced	This is a repeat of comment 129.

		<p>from purpose-bred colonies, which maintain certain attributes within the breeding group. This assists the quality and consistency of the study and may be a regulatory requirement (eg SPF animals), and can also reduce the numbers required. ? Transportation enables researchers to share genetically unique strains and to enhance collaboration. It also reduces the need to potentially overbreed commonly used strains. Reducing the options to transport and exchange animals used for scientific purposes with new regulations could lead to an increased number of breeding facilities. More breeding facilities could mean potentially the over-production of animals, since there will be a duplication of animals across countries.</p>	
<b>133</b>	Out of scope	<p>Given the existing strict regulatory framework for the welfare of animals transported for scientific purposes, we see no scientific or ethical justification for bringing specific rules concerning these animals into legislation governing the transport for all animals, namely those used for farming purposes and as companion animals. Animal welfare is a priority. The primary objective for those engaged in scientific research programmes, while also ensuring that all legislative requirements are met, should be that animals are transported in a manner that does not jeopardise their well-being. This is important for good animal welfare and ensures their safe arrival at their destination in good health and with minimal distress. All animals should be transported under appropriate conditions. The highest standards of welfare are critical to the industry, as without them valid research results would be impossible to achieve. Valid research results are also necessary in order to receive regulatory approval for a drug in the development process.</p>	Not applicable/no need/no comment
<b>134</b>	Out of scope	<p>Two regulations are confronted and often generates issues : work regulations limiting the driving time of truck drivers to a certain amount before a break (for their own welfare), and the regulations for the welfare of animals during transport. It so happens that sometimes truck drivers have to start their break even if the destination point is almost reached or even when the truck is parked inside the realm of the destination but not exactly at a place where animals may be unloaded, the truck being therefore stuck and causes the animals to extend the journey to a greater length. Another issue may be the organisation of official controls by the competent authority, as they may complicate transporters in the organisation and execution of the journey. This may happen when controls are delayed, which can hardly be predicted, and this may also happen when transporters need to fit the departure time to the working hours of the competent authority, as they need to be present for loading and unloading of trucks. This altogether may lead to a disorganisation at the destination point, for instance trucks waiting longer than they should have at port to load the animals on ships.</p>	Not applicable/no need/no comment

<b>135</b>	Out of scope	EU good practices guides on animal welfare during transport should be considered along with the regulation. These guides are based on scientific publications and technical experiences given by actual animal transporters and all stakeholders, and were shared at EU level in 2015 through a European Commission working group on animal transport welfare guides.	Not applicable/no need/no comment
<b>136</b>	Out of scope	The transport of unweaned calves is a subject of interest, a dedicated research project is currently running in Ireland (MOOVE project). The outcomes of this project should give a clearer prospect in terms of risk analysis and finding innovative, accurate solutions. These outcomes are not available yet .	Not applicable/no need/no comment
<b>137</b>	NA	Nous n'avons pas identifié d'autres pratiques de transport. Nous avons identifié 3 difficultés pour l'exportation par navires et Roll on, roll off : - La disponibilité des vétérinaires responsables des transports. Les exportateurs doivent adapter leurs horaires aux contraintes des disponibilités vétérinaires, ce qui crée des amplitudes de transport plus importantes et des attentes aux ports. - La douane. Certains douaniers bloquent les camions à l'entrée des ports ce qui retarde le chargement des animaux - La réglementation sociale du transport qui peut aller à l'encontre du bien-être animal. Souvent les animaux ne peuvent pas être déchargés car le chauffeur est en pause. La non-flexibilité de la réglementation sociale du transport engendre des allongements du temps de transport. Pour le transport routier, nous avons identifié une difficulté commune avec l'exportation qui est la non-flexibilité de la réglementation sociale du transport qui allonge généralement le temps de transport de animaux.	Not applicable/no need/no comment
<b>138</b>	NA	Nous n'avons pas identifié d'autres pratiques de transport. En ce qui concerne les difficultés pratiques, les opérateurs s'organisent pour garantir le bien-être animal, et nous sommes bien aidés par les services santé animale des DDCSPP. De plus, les animaux doivent être bien transportés , il en va de la responsabilité des opérateurs pour valider le bon déroulement du transport sans quoi le trajet n'est pas rémunéré. Tous les trajets longues distance utilisent des camions équipés de ventilateurs avec relevés de températures à l'intérieur des camions. Un capteur permet de signaler au chauffeur l'évolution de la température tout au long du trajet, ainsi il gère à son gré la mise en route ou l'arrêt des ventilateurs. En cas de chaleur, la surface utilisée pour les animaux est augmentée. Le bien-être animal est au cœur de nos préoccupations, au niveau national un label de responsabilité sociétale a été créé par notre fédération : QUALI NEGOCE, un vif engagement. De plus sur le territoire, les transports lors d'alertes canicules orange ou rouge sont interdits entre 13h et 18h, et dans ces cas les opérateurs sont dans la contrainte de modifier leurs horaires pour garantir le bien-être des animaux et respecter les heures de conduites des chauffeurs.	Not applicable/no need/no comment

<b>139</b>	NA	Afin de garantir le bien-être animal, nous disposons de guides de bonnes pratiques réalisés avec les syndicats professionnels « Animals Transport Guide ».	Not applicable/no need/no comment
<b>140</b>	Out of scope	<p>Pregnant animals : Regulation 1/2005 allows for the transport of pregnant animals until the 90% of the pregnancy stage, meaning a lot of risks for these animals : stress, pain, risk of abortion and early calving, all this of course added to the serious breaches to welfare which goes along with transport in general : stress, overcrowding, transport-induced injuries, dehydration, heat or frost stress. Similar observations can be made with transport of unweaned calves Fish welfare during transport should be assessed with a species-specific approach Rabbits and poultry transport should be assessed : Transport crates : we have to impose minimum dimensions for transport crates, in particular the height of the crates (in order to provide sufficient ventilation with space above the heads while standing up). channel the flow of urine and faeces: currently, rabbits and birds on the lower floors receive the faeces from the crates above. impose density limits within the crates: currently, no limit is set for rabbits. Transport times : limit transport to 4 hours maximum, loading and unloading included, the time must be counted from the moment the first rabbit is put in a transport crate to the last rabbit being taken out of a transport crate (as provided by the regulation) According to our observations, rabbits, chickens and other birds remain in transport crates until they are taken out to be stunned or suspended on the chain. Their "transport" time can thus be considerable. Watering and feeding : We have never seen any feeding or watering system in the rabbit transports. However, farmers told us they use what they call "sponges" so that the rabbits can hydrate. Some journeys can last up to 10 hours. Animals should have access to food or water. Handling of fragile animals Collectors are given very contradictory orders : to go very quickly VS public expectation to be less brutal. The injunctions of the industry prevail (to the detriment of the animals).</p>	Not applicable/no need/no comment
<b>141</b>	Out of scope	<p>Bord Bia/Irish Food Board was established by an act of the Irish parliament (the Dáil) in December 1994. Along with the promotion of Irish food and drink, Bord Bia also plays a role in market development for livestock. This function is reflected in the Bord Bia Act, which became part of the Irish statute the organisation was established in 1994. The livestock export trade has evolved considerably since then, similar to other commercial industries. Live exports continue to represent an alternative selling outlet to the processing sector, and therefore provide some additional competition in the marketplace. Ireland takes its responsibilities to uphold animal welfare standards during transport very seriously and is fully committed to enforcing existing rules. Bord Bia's work on behalf of the livestock sector involves close collaboration with the Department of Agriculture, Food and the Marine (DAFM), whose veterinary officials oversee and enforce the stringent</p>	Not applicable/no need/no comment

		transport regulations and export controls, including Regulation (EC) No 1/2005. Each individual consignment of animals exported from Ireland is supervised by DAFM, in terms of animals? health or fitness to travel, full traceability and route plan, loading practices, space allowance, availability of water and bedding. The highest priority is given to safeguarding animals? wellbeing during transport or handling, alongside protecting from any suffering or injury. All stakeholders involved in this trade recognise the need to employ and demonstrate best practice in this area. Therefore standards are continually being reviewed and improved where necessary.	
<b>142</b>	Out of scope	While the majority of live cattle exports from Ireland are to continental European Markets (167,000 head/63% in 2020) a small proportion are also exported to non-EU markets (28,000 head/11% in 2020). The majority of these international exports travel on-board dedicated ?walk-on: walk-off? vessels, which are intensively inspected and if suitable certified by DAFM on a regular basis. Dedicated Livestock Vessels must meet exacting standards as laid down in Ireland?s national legislation on such vessels. A specialised OV trained in ship assessment together with a marine engineer conduct the approval inspection for such vessels, which takes typically 1-2 days. Ireland has an excellent reputation for supplying high quality, healthy cattle for customers in Europe, and beyond, and maintaining these high standards is a key focus of Bord Bia and other key stakeholders in the sector in 2021 and beyond. The live export trade is recognised as being critically important to the Irish agri-food sector and stakeholders involved at all stages of the process are committed to ensuring the highest standards of animal welfare are upheld at all stages.	Not applicable/no need/no comment
<b>143</b>	Out of scope	It is important that any proposed changes to the existing Regulation (EC) No 1/2005 are based in scientific fact and we support the undertaking of any research that assesses the impact of transport on animals, particularly un-weaned calves. Recent research undertaken by Marcato et al 2020 (Effects of pre-transport diet, transport duration, and type of vehicle on physiological status of young veal calves) have indicated that the recovery rate of calves post-transport was very quick with calves blood levels restored to their pre-transport values within 24 h post-transport. A further study by Marcato et al 2020 (Transport of Young Veal Calves: Effects of Pre-transport Diet, Transport Duration and Type of Vehicle on Health, Behavior, Use of Medicines, and Slaughter Characteristics) indicated that pre-transport diet and type of vehicle affected health and behavior of veal calves in the short term, but had no effects in the long run, including on slaughter characteristics. It is important that information gathered from studies such as these is considered, and expanded upon to help fully inform any proposed changes to current legislation.	Not applicable/no need/no comment

144	Out of scope	I attach the latest report on animal transports by Jarosław Urbanski, a PhD economist. This is the first report in Poland which focuses on various aspects of animal transport. Part of the report is dedicated to official inspections of animal transports. From the experience of Polish animal welfare organisations, it can be concluded that there is a major problem with the very weak supervision of transports. There is a lack of rest points for animals and better monitoring and regulations related to loading (especially poultry).	Not applicable/no need/no comment
145	Out of scope	In the context of possible drafting of legislative proposals, the Commission needs new opinions that reflect the most recent scientific knowledge: UECBV fully supports this sentence as scientific knowledge must be constantly updated and the new evidence is crucial for drafting new legal provisions. Thus, other sources of scientific evidence must be reliable, and new scientific evidence should be developed.	Not applicable/no need/no comment
146	Out of scope	A UECBV position document is attached on this section. The document collects UECBV's opinion on EFSA's Consultation in general terms and also detailed remarks on specific sections of EFSA's document. Regarding the mandate of the European Commission to EFSA to review available scientific publications and possibly other sources to provide a sound scientific bases for future legislative proposals: the nature of the information obtained from other sources should be specified, as no scientific basis information is not eligible to make legal decisions on animal welfare, animal health or public health. This topic is again raised on point 2.1 (Background), 11th paragraph. In addition, regarding the wording any available recorded data related to the microclimatic environment experimented by animals during transport: it also should be clear that the recorded data must have been obtained in a legal way and its origin (place and date) must be certified by a competent authority and after agreement of the relevant operator. This topic is again raised on point 1 (Introduction, 14th paragraph).	Not applicable/no need/no comment
147	Out of scope	The details of this point can be found in the attached document. We suggest to replace the expression industry practices by livestock trade practices. On specific inquiries: 1. The impact of loading and unloading of animals in animal welfare in the stops. The impact of variation factors regarding animal welfare. 2. This point is crucial for ensuring animal welfare, but also for the appropriate implementation of legislation. The administrative burden to ensure compliance with the legislation is so high that sometimes it might put in risk per se the welfare of the animals. The bibliography scarcely studies, or does so indirectly, the influence on the well-being of the variation factors that define transport. At this point, it should be emphasized that the regulations precisely regulate these aspects, so it is not possible in most cases to have firm and directly applicable conclusions about them when drafting the legislation. In addition, there are clear gaps in scientific knowledge, and that the interest of the authors in specific areas	Not applicable/no need/no comment

		can also be detected, with few or no studies in other areas. As an example, we suggest investigating the influence of several factors, such as the environment, noise, light, or dizziness, in transport. Preparation of animals for transport, other than suitability: facilities, handling, feeding, physical condition? The incidence of the previous transport, by ship: thermal stress, density, and gases (ammonia). The availability of veterinarians in transport by vessels, to avoid unnecessary delays at port. Need for Fast Tracks in borders. 3. "Recorded Data" must only be obtained in a legal way, with official certification and approval from operator.	
<b>148</b>	Out of scope	The seven scenarios that the Commission identified with practical difficulties or insufficient information in ensuring the welfare of animals being transported are defined as "specific industry practices" on the third paragraph. This mention should be replaced by "specific livestock trade practices", as the main of them have no link to industry and these activities are inherent to the farm sector.	Not applicable/no need/no comment
<b>149</b>	Out of scope	well-being, healthy animals; lower stress, breeding,	Not applicable/no need/no comment
<b>150</b>	Out of scope	EFFAB is available to provide further details and information on the reasons and needs for transport for breeding animals and/or for breeding purposes. And the ways they work to improve the means of transport and the welfare of animals	Not applicable/no need/no comment
<b>151</b>	Out of scope	The scientific opinion requested by the EC takes into account different types of animals and health status. Breeding animals use to have a specific health status to be able to join semen collection facilities or farms. They often travel to start or continue a reproductive life or be at a farm for an important part of their life. Breeding associations and companies have specific commitments to preserve both animal health and welfare and allow such animals to express their genetic potential at destination. That's why, breeding animals have to be taken into account separately when requesting a scientific opinion. the movement of genetic resources and genetic progress is vital to increase sustainability of livestock production.	Not applicable/no need/no comment
<b>152</b>	Out of scope	Animal breeding activities and providing adequate genetics to farmers need to transport genetic resources, by transporting germinal products and animals. Animal breeders adapt the transport to external conditions, extreme temperatures, traffic or other to always provide better environment to maximise well-being of animals during short and long transport. The purpose is to transport animals when other possibilities are not the best option (e.g. pig frozen semen doesn't guarantee good conception rates and genetic progress is the combination of female and male genetic material)	Not applicable/no need/no comment

<p><b>153</b></p>	<p>Out of scope</p>	<p>Breeding companies complete genetic selection to improve the traits that are highly valued. Ultimately, these improvements help to ensure that each animal will enjoy a healthful and productive life. These traits include proper body conformation (i.e. foot and leg structure) , robustness (i.e. liveability) which are clearly traits that are foundational for maximizing ?fitness for transport?. Additional traits allow to perform responsible and balanced breeding which it's adopted by EFFAB members through CODE EFABAR <a href="http://www.responsiblebreeding.eu">www.responsiblebreeding.eu</a> The exhaustive list of criteria are in the specific species templates. The European Commission emphasizes the importance of ?fitness for transport? for each animal prior to loading. Their assumption is that this assessment will be completed immediately prior to the loading process. However, in addition to a pre-shipment inspection, breeding companies take a much more proactive and wholistic approach to the concept of ?fitness for transport.</p>	<p>Not applicable/no need/no comment</p>
<p><b>154</b></p>	<p>Out of scope</p>	<p>Transporting breeding animals has to be made taking into account a number of important factors : - the capacity of the mean of transport to keep a reasonable temperature for animals (density, humidity and age/weigth of the animals are key to calculate) - loading time has to be minimised - social groups during transport - resting point able to maintain biosecurity - water temperature - administrative efficiency - evaporative cooling management for pigs and ruminants - stress of uploading - the importance of bedding</p>	<p>Not applicable/no need/no comment</p>
<p><b>155</b></p>	<p>Out of scope</p>	<p>Characteristics and criteria to be taken into account to transport animals for breeding purposes : - health status : Animals that are free of significant production limiting diseases also live lives that are free from sicknesses. Hence, freedom from significant disease promotes ?fitness for transport and able to join farms or semen collection centers - biosecurity during transport ; Breeding companies also engage resources to ensure that the trucks, trailers, equipment and supplies which are used to transport their animals are biosecure. These efforts are focused on preventing new disease introduction which would negatively impact the long-term health and well-being - design of pre-shipment staging and load out areas must be designed properly to minimize stress prior to the loading or off-loading event. For this process to occurring effectively, consideration should be given to: ventilation, group size capacity, flooring materials, ramp dimensions, lighting, and access to water points - during transport monitoring : temperature is monitored and recorded during the whole journey - training of workers and transporters is done to preserve health and welfare at any moment</p>	<p>Not applicable/no need/no comment</p>

<p><b>156</b></p>	<p>Out of scope</p>	<p>In addition to the elements described above in the context of this contribution, we would point out that it is impossible in practice to implement any of the provisions of Regulation (EC) No 1/2005, thereby nullifying the beneficial effect that it could have presented for animal protection. It concerns the ineffectiveness of Article 6.6 of the Regulation. This article provides that an attendant (possibly the driver) must accompany each consignment of animals or that "animals are transported in containers which are secured, adequately ventilated and, where necessary, contain enough food and water, in dispensers which cannot be tipped over, for a journey of twice the anticipated journey time" (Article 6.6., a). In practice, the presence of an attendant is often preferred to the obligation to accompany the transport with the elements described in article 6, 6., a. It is therefore very often not applied. Although the duties of transporters require them to be aware of the conditions in which animals must be transported in order to cause as little harm as possible to their welfare, the alternative nature of this provision is not capable of guaranteeing the effectiveness of the protection afforded to the animals transported. In particular, in the event of delays during the journey, the animals must be able to be fed and watered sufficiently during transport. ? Recommendations : The above conditions should be made cumulative. In addition to the fact that such an amendment would contribute to the protection of the animals during transport and would be consistent with Article 22 of the Regulation on delays during transport, it would simply give the attendant additional means to carry out his task.</p>	<p>Not applicable/no need/no comment</p>
<p><b>157</b></p>	<p>Out of scope</p>	<p>We have taken note of the "terms of reference" described by EFSA in the document annexed to this consultation and confirm their qualifications. However, we would like to clarify : ? That young animals should not be forgotten in the list of Group 1 animals (« free-moving animals »). Specific provisions about this subject indeed are to be found in the Regulation. This point is fundamental since the provisions provided in Regulation (EC) No 1/2005 regulate the conditions under which transported animals must be protected, according to their species and physiological needs. That is the reason why the regulation defines a number of practices paying attention to whether the young animals transported have been weaned or not. Journey and rest times are currently adapted by the regulation for animals that are fed milk and are not weaned (Annex I, chapter V, 1.4, a), which needs to be strengthened. ? That the issue of feeding and watering should not be limited to « very long journeys » (identified as those requiring unloading and/or the need to feed the animals). Watering and feeding facilities should be provided within the means of transport systematically, irrespective of the length of the journey, in order to safeguard the welfare of the animals and to anticipate possible delays and/or temperature conditions that could adversely affect them. For example, Welfarm has seen horses brought on markets the eve of the day of their transport without any sufficient watering or feeding. "Very long journeys"</p>	<p>Not applicable/no need/no comment</p>

		should then refer only to journeys of more than eight hours which require sufficient rest time before resuming the journey concerned, as addressed in Annex I, Chapter V of Regulation (EC) No 1/2005.	
<b>158</b>	In the scope	In the context of the identification and assessment of common transport practices, it is essential to extend the scope of the Regulation to all animals transported (which falls under points 6 and 8 identified in this category by EFSA). In the current regulation, the following limitations have indeed been identified: ? Rabbits are not among the animals for which the Type 2 transport authorisation is required in the case of long journey (for an example in France, see document CERFA N°15714*01). Thus, in the CERFA document in paragraph III "scope", "species concerned", a box "lagomorphs" should be added. ? Rabbits and poultry are excluded from the obligation for the transporter to carry a journey log (Regulation (EC) No 1/2005, article 5.4). We therefore suggest that this paragraph should be redrafted to explicitly mention lagomorphs and poultry as species concerned by this obligation in the case of long journeys. ? Rabbits and poultry are also excluded from the requirements for ventilation systems, temperature controls, GPS recording, etc. (Regulation (EC) No 1/2005, Annex 1, Chapter VI). In consideration of the scientific work that has shown the capacity of these animals to experience suffering and stress, it is necessary to extend these provisions in order to integrate the transport of poultry and lagomorphs. Appropriate devices should accompany the transport of these animals, in particular to ensure optimal temperature conditions.	Please see the opinion dealing with the welfare of animals transported in containers, where lagomorphs were taken into consideration.
<b>159</b>	Out of scope	As an NGO specialized in the global protection of farm animals, Welfarm became aware of the mandate entrusted to the EFSA by the European Commission. After consideration of the document attached to this consultation and called « A Public Consultation on the Request for a Scientific Opinion Concerning the Protection of Terrestrial Animals During Transport », we would like to share our comments about some of its sections. Although we do not have any specific comments to make to EFSA on its « Introduction », we would like to share some background about our NGO in order to contextualise the working method we used for this consultation. Created in 1994, Welfarm is a Charity located at 76 Avenue André Malraux à Metz (57000, France), our NGO has several missions. We raise awareness about farm animal welfare and encourage responsible consumption. Through our support approach, We support and encourage initiatives by farmers,	Not applicable/no need/no comment

		<p>the food industry and retailers that contribute to improve animal welfare on farms. We promote and disseminate the state of knowledge in biology, physiology and ethology of farm animals according to their species, within the framework of a verified documentary and scientific approach, particularly to the school-children. We ensure that the regulations are properly applied, in particular by providing assistance and expertise to the French law enforcement officials. We are working to improve French and European regulations protecting animals. We host farm animals that have been victims of mistreatment on our farm sanctuary, La Hardonnerie. Finally, we would like to point out that in the context of our institutional activities, we are involved in the working groups organised by the Directorate-General for Food of the French Ministry of Agriculture and Food (DGAL) about livestock transport on long journeys. It is therefore on the basis of our scientific and legal knowledge, as well as our field experience, that we are proposing this input.</p>	
<b>160</b>	Out of scope	<p>After briefly commenting on the legislative context described by EFSA in its document (2.1) and suggesting some additional elements related to the terms of reference (2.2), we address in this section our remarks and proposals related to the assessment of the common transport practices (2.2.1). We also propose some additional information that may be relevant to the seven specific practices that have been identified by EFSA (2.2.2).</p>	Not applicable/no need/no comment
<b>161</b>	Out of scope	<p>Please see the attached file.</p>	Not applicable/no need/no comment
<b>162</b>	Out of scope	<p>Please see the attached file.</p>	Not applicable/no need/no comment
<b>163</b>	Out of scope	<p>Please see the attached file.</p>	Not applicable/no need/no comment
<b>164</b>	Out of scope	<p>It is essential to establish parameters relating to the available spaces that take better account of the different categories of animals and different species, so as to adapt the means of transport accordingly. This would allow Member States to refer to harmonized standards in the EU. The Veterinary Authorities of the Romanian Government, with note 25657 of April 5, 2021, have issued of the precise national provisions on the transport of animals, in particular on the height of the compartments. The note was necessary to give an interpretation to Regulation (EC) 1/2005, which should provide for more precise and specific parameters for each individual species or categories with particular needs (cows at the end of their career). Furthermore, with clearer provisions that can be shared at Community level, trade in live animals would be facilitated.</p>	Not applicable/no need/no comment

<b>165</b>	Out of scope	The present legislation fails to protect the welfare of animals. E.g. by allowing long distance transports, too high stocking densities, too low standing heights, mixing unfamiliar animals, no clear temperature and humidity rules, etc.. Also it has many vague rules open for different interpretations. The implementation and the ways of enforcement and the penalties differ per country. The animal welfare training drivers have to follow is too short to be serious. Etc. All these and other shortcomings have to be met by making better legislation with interpretation, implementation and enforcement the same all over Europe.	Not applicable/no need/no comment
<b>166</b>	Out of scope	Good that the EFSA panel comes with a new update and conclusions and recommendations	Not applicable/no need/no comment
<b>167</b>	Out of scope	I do not see what other transport practices can be envisaged. As our remuneration depends on the good condition of the cattle delivered, we organise ourselves to ensure that transport is carried out in the best possible conditions. The trucks used for long distances are equipped with temperature sensors and fans. The driver is warned if the temperature is high and activates these fans to bring it down. Our professional federation has created and developed a label of social responsibility: QUALI NEGOCE, a strong commitment that places the well-being of the animals at the centre of its concerns.	Not applicable/no need/no comment
<b>168</b>	Out of scope	We are concerned about three issues that may affect export by ship: - we are dependent on the timetables and availability of vets, which can lead to early departures or delayed unloading in port. - customs can block trucks and thus delay unloading. - The social regulation of transport is rigid and drivers can be forced to take a break when they are only a few minutes from their destination or even arrive and be prevented from moving their truck to unload it during the mandatory break. This is also true for road transport.	Not applicable/no need/no comment
<b>169</b>	Repetition	We are concerned about three issues that may affect export by ship: - we are dependent on the timetables and availability of vets, which can lead to early departures or delayed unloading in port. - customs can block trucks and thus delay unloading. - Drivers can be forced to take a break when they are only a few minutes from their destination or even arrive Often the animals cannot be unloaded because the driver is on a mandatory break This is also true for road transport.	Repeat of comment 168
<b>170</b>	Out of scope	Our professional unions have drawn up a guide to good transport practice which they make available to operators. For maritime transport, most charterers provide a daily report on temperatures and humidity in the holds.	Not applicable/no need/no comment
<b>171</b>	Out of scope	the regulations must not go against animal welfare, the regulation of transporters for example must allow the transporter to move his truck to the unloading dock so that the animals stay in the trucks as little time as possible	Not applicable/no need/no comment

<b>172</b>	Out of scope	In the case of long-distance transport, the transporters are obviously approved, but they are also experienced, they know how to act in hot weather, for example, and they are also helped by very efficient tools	Not applicable/no need/no comment
<b>173</b>	Out of scope	Operators are forced to adapt their loading times to the availability of vets, which sometimes prevents night loading and therefore journeys at the lowest temperatures	Not applicable/no need/no comment
<b>174</b>	Out of scope	Regarding maritime transport, ships send operators daily reports on the condition of the animals on board, the food stocks, the quantities of water given to the animals as well as the temperatures on all the decks of the ship.	Not applicable/no need/no comment

## **Appendix C – Attachments to comments submitted**

To see attached documents visit: Open EFSA to see the details and the results of the Public Consultation on the Protection of Animals During transport which can be found here: [link](#)

Attached files will be linked to some comments and can be downloaded by clicking on the file name.