



## EEF Position paper on the proposal for Regulation on protection of animals during transport

As an European umbrella organisation, the European Equestrian Federation (hereafter EEF) represents 40 national Equestrian Federations, including 27 from the European Union. 9 members representing equestrian disciplines and/or staff are also associated. One of the objectives set by the EEF is the “accessibility of equestrian sport with horse welfare as the guiding principle of our progressive and transparent leadership”.

The EEF is a member of the Fédération Equestre Internationale (FEI) and the European Horse Network.

Sharing some points of view with the above-mentioned organisations, the EEF would like to share its opinion on the proposal for Regulation released by the European Commission in December 2023.

In this proposal, the European Commission has taken into account previous comments from the European equine industry, for which the EEF is grateful.

### **New classification based on the purpose of the journey**

The EEF welcomes the **new classification based on the purpose of the journey**. We consider it truly facilitates our aligned welfare objectives than does the existing legislation, based on the distinction between ‘Registered’ and ‘Non-registered’ Equidae.

As other organisations, the EEF is fully committed to improve welfare conditions during transport, traceability thanks to new technological innovations and calls for more scientific studies and data on transport conditions regarding equids’ welfare.

In the proposal, some transports are subject to article 4, especially those *“for the purposes of participating in training, exhibitions, competitions, cultural events, circuses, and equestrian sport and leisure activities”*.

The EEF supports this provision proposed by the European Commission (article 2, paragraph 2) as equestrian activities are based on a regular practice, including competitions at local, regional, national and international levels. Participating to the objectives of the European Union in terms of education and in favour of health-enhancing physical activity, the EEF underlines the importance of grassroots sport in equestrian sector, which is not limited to elite sport.

Nevertheless, due to the importance of the economic figures in the equestrian sector in terms of competitions and sales, the EEF calls for an extension of article 4 to the breeding activities and sale of sport horses as these Equidae are transported in the best conditions in order to ensure their safety and welfare. **Nonetheless, the EEF would like to bring the policy makers’ attention to some important points, which could profoundly affect equestrian activities:**

### **Supervision of vet during loading and unloading operations Art 17, §2 et Art 25, §3**

The proposal introduces the obligation for a vet to supervise loading and unloading operations. **For the European equestrian sector, this requirement is unrealistic and impossible to apply.**

**According Regulation (EC) No 1/2005 “Personnel handling animals must have received adequate training and be competent.” People who transport horses pass education and receive a license. The education includes loading and unloading of the horses.**

Putting into place such a requirement puts veterinary services at risk of being overloaded when they already find themselves under-staffed on the ground. It could also lead to a reduction in time allocated for veterinary treatment being taken up by supervising loading and unloading operations.

Moreover, loading and unloading operations can happen early in the morning or at night, particularly in the summer, to avoid excessive heat. It would be difficult to find available vets at these times.

As transport is an integral part of equids’ lives, it would mean numerous presence of vets.

#### **Obligation to track vehicles with a positioning system Art 24**

In the proposal, the Commission seeks real time surveillance of vehicles thanks to geo-localisation systems directly linked to TRACES. While such systems can bring advantages in terms of traceability, the sector wishes to underline the financial impact this requirement represents.

Putting geo-localisation systems into vehicles implies an update of all the softwares already being used or for amateurs/professionals who do not possess one to invest. **This compliance represents a significant financial outlay for a number of person in our sector.** Therefore, it seems that it is necessary to put in place simple and uncomplicated solutions to allow a functional use. **The development of a mobile application for GPC localisation could be an appropriate solution.**

Furthermore, a legislative proposal, written in 2023, cannot easily forecast technological developments that would allow traceability of vehicles and animals in the years to come. **The European Commission should be able to amend surveillance tools through implementing or delegated legislation**

#### **Temperature rules Art 31**

The Commission’s proposal to base its rules solely on external temperatures is concerning for the sector. These requirements based on general scientific foundations do not take into account the specificities of each Equidae and each country in accordance with essential parameters, namely:

- Ratio temperature/humidity inside the vehicle, which is extremely important for equine welfare.
- Presence of a ventilation system and circulation of air which allows internal temperatures to be lower than the external temperature.
- Accustomization to extreme temperatures can vary according to the geographic origin of the horse. There are large temperature differences between Member States. Consequently, animals in different countries do not react to temperatures in the same way. Applying uniform rules to all Member States would lead to an unlevel playing field between northern and southern countries which could distort internal market competition.

The EEF wants the factors cited above to be taken into account and proposes that each Member States should be given autonomy to adapt transport conditions according to its own geographical situation.

#### **Space allowances Art 31 (e) et Annexe 1, Chap 7**

Article 31(e) has an obligation for transporters to increase space allowance by 20% when temperatures are above 30 °C. **Unlike other species, horses are transported in individual stalls. In practical terms, it is impossible to modify the size and the layout/design of stalls during transport to take into**

**account changes in temperature.** The EEF therefore requests that this requirement is modified to take into account the specificities of transporting Equidae.

Likewise, the design of stalls to standardised dimensions **makes it impossible to adapt vehicles to the individual physical characteristics of each Equidae, stipulated in Chapter 7 of Annexe I.**

Moreover, some horses need the help of the stall walls to keep their balance. **The increase in space is therefore not synonymous with welfare and could even result in the opposite effects, heightening the risk of falls and injuries during transport.**

In terms of environmental impact, these requirements are contrary to the EU's own carbon reduction targets. **These requirements would force transporters to use more vehicles to transport the same number of Equidae,** leading to higher greenhouse gas emissions to transport live animals.

**The increase in space allowances also represents an economic problem with significant investment needed to conform to new vehicle specifications.** These investments will be difficult for professional transporters as well as for professionals in the equine sector, or amateurs who transport their own Equidae.