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## **Impact assessment on the Animal Welfare** **Regulation in transport**

The Commission's proposal, which will be released on December 6 and will be presented to the College of Commissioners for debate and future approval by the Council and Parliament, is born from the “**Welfare Package**” (farm, transport, slaughter and labeling). without the operators having been consulted nor having had a technical-practical debate, neither with the transporters nor with the operators.

In the State of the Union address by Commission President Ms Von der Leyen cited that greater dialogue was needed and extreme positions should be avoided. We know that this proposal has come to light early and without debate due to the political pressures that NGOs are exerting and, therefore , **the proposal was born without dialogue with the affected sectors.**

The previous regulation, Regulation 1/2005, is the most demanding global regulation regarding animal welfare in transport. Therefore, the European Union faces a reform from a very advanced position with respect to the rest of its trading partners, which can harm the competitiveness of the livestock sectors. We believe that more effort should have been put into harmonizing and verifying compliance with current regulations before addressing new and more demanding requirements.

The **impact study is wrong** and the Commission has to review it. It is indicated that travel time limitations for ruminants and pigs will have a positive impact on animal welfare and are not expected to have a large economic impact. This is clearly wrong. The **indirect restrictions that this would mean for pigs and ruminants** are not taken into account , and totally limiting intra- and extra-community trade, affecting both the economy of the sector, the jobs of transporters and the viability of farms that would not have animals. to prime.

In **the case of pigs**, 3 million piglets are imported for fattening, which has an impact on the sector's turnover of more than 500,000,000 euros. Furthermore, without these animals the meat industry has a significant shortage of animals, increasing its operating costs due to the limited availability of animals.

In the case of the **impact of restrictions on movements at high temperatures** (+30°C), it does not have an adequate impact either since it does not take into account the restrictions, the extra cost of night trips and the social implications of having to work at night.

In this sense, if the proposal of 9 hours for transport for slaughter and 21 (10+1+10) for life goes ahead, there would be problems in some transport within Spain (for slaughter) and the possibility of importing piglets from Holland.



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To have access to the Dutch piglets, 3-day trips would be required, including a 24-hour stop for unloading and subsequent loading, which would make the extra cost of these animals unfeasible and it is also doubtful that a 66-hour trip (21 +24+21) provides an increase in animal well-being compared to another 24 hours without having to unload and load the animals. In addition, Spanish cattle production would lose 30 % of its supplies of suckler calves, currently coming mainly from Ireland or the Czech Republic.

Furthermore, with current production and trade figures, 30% of the volume of imported suckling calves would be reduced since they come from origins that require 2 transport cycles (9-1-9/24/9-1-9). Only calves imported from France could be saved. As a consequence, the need also arises to invest in new adapted trucks.

With the implementation of the maximum of 9 hours of transportation, it is estimated that 15% of national slaughter movements are long. This would mean difficulty in slaughtering some 302,000 animals. Ends sacrificial export to Italy. This export occurs mainly from Aragon, which exports about 30,000 animals/year.

If it were limited to a maximum of 8 hours , **it would mean the closure of 3,200 farms and the loss of 4,800 jobs** . Likewise, the prohibition of carrying out more than one transport cycle, but allowing cycles of 9+1+9 hours, would save the national movement - subject to significant investment - but would also cause the closure of 1,280 fattening farms and the loss of 1,920 jobs. direct.

The **stopping point** to resume trips of more than 21 hours has the following **drawbacks** :

- Health risk due to being in contact with pathogens other than those of the farm of origin. Important in the current context of the European Union regarding official diseases since it is circulating: EHE, HPAI, PPA, LA...
- The tasks of unloading, housing in pens, and loading are the most stressful actions for the animals. So from the point of view of animal welfare it can be questioned.
- Therefore, the definitions of “point of departure” and “arrival” require that the animals remain for one week before being re-dispatched. This is totally counterproductive for the well-being of the animals.

For the export of animals to third countries by ship (more impact on ruminants), the operator has to ensure that the competent authority of the third country has signed and sealed the Certificate and it is returned to the Authority of origin. This may affect the guarantee of maintaining constant flows and, above all, it is beyond the reach of the European operator to interact on a competent authority of a third country and must be based on the EU's trade agreements with third countries according to international standards. of the WTO and the WHOA.



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Regarding **high temperatures** , if the outside temperature is greater than 30°C the animals **can only be transported at night** (between 9:00 p.m. and 10:00 a.m.) this creates many **problems** :

- Currently there is difficulty in meeting the needs of transporters of live animals. Forcing your work to be at night in hot countries will make it more difficult to find drivers.
- In Spain, animals have adapted to the climatic conditions of the Iberian Peninsula, especially those breeds produced extensively. It is not understood that an animal adapted to living above 30°C has restrictions on being transported at that temperature.
- The design of the vehicles with automatic ventilation guarantees the thermal comfort of the animals during the trip.
- From a social impact point of view, the transporter of live animals that operates in southern EU countries will have to change their personal life to work nights during the months when these temperatures are exceeded.
- It would be necessary to give flexibility to the Member States to manage the difference in temperatures, as is being done now in summer by Spain and other countries.

Likewise, there is **disproportionality in the legislation** . This legislation violates the equality of all Europeans and all Member States, especially discriminating against Spain for being a peripheral and warm country:

- The geographical location of Spain within the EU means that in order to have the same access as the rest of the member states to the European Single Market, the distance and duration of trips is greater than in the countries of central Europe. The restriction on travel hours is a measure aimed at negatively affecting Spain, which needs more travel hours to access European markets. This restriction affects the free movement of people and goods in the EU.
- Spain is a warm country. Likewise, along with the southern countries, Spain is a warmer country in summer than the rest of the EU, so the restrictions on transporting animals at more than 30°C will have a notable impact on Spanish livestock farming. Currently, both farmers and transport operators and means of transport are adapted to these temperatures and currently these trips occur without negatively affecting the animals. It is necessary to distinguish temperatures of more than 30°C where the animals are already adapted from the farm with “heat waves” which are specific phenomena with sudden increases in temperature over a period of time (from 2 to 7 days). We believe that restrictions should be limited to non-normalized periods of high temperatures.



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Regarding the **reduction of densities**, the EC proposal increases the necessary area per animal by 70% (density reduction of 40%). The large increases in m<sup>2</sup>/animal, which in the case of pigs are greater than 38% more space, have 2 important aspects not taken into account:

- Unintentional movements of the load. By increasing the space, the animals are more at risk of moving in the truck (curves) and this can lead to pushing, hitting and aggression. Even the presence of injuries and trauma problems due to unintentional movement due to roads can be considered.
- The reduction in the number of animals per transport entails the need for a greater number of trucks and transporters to transport the same animals. Specifically, in the case of infants, they would transport around 150 calves/trip. In the case of grazers, 44 fewer animals/trip. In the case of the industry, we would also have to consider the impossibility of transporting on two floors, counting, for example, with 33 calves/trip, that is, 77 fewer animals. This leads, in turn, to three problems:
  - Problem of hiring new carriers. There are no drivers at present and even less in the future
  - Increase in costs due to an increase in the number of trucks. That is, purchase of more trucks
  - Environmental impact. CO2 emissions linked to transport increase and therefore the environmental footprint of the sector as a whole.

All of these measures, together, would mean the disappearance of 6,190 production farms in Spain, especially calves, 2,200 of which would have to be relocated, reducing the number of animals slaughtered by 25%, as well as the entire activity of the beef industry. In addition, the production costs of the value chain would increase by 220.8 million euros.

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