



PVSGE response to REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of animals during transport and related operations, amending Council Regulation (EC) No 1255/97 and repealing Council Regulation (EC) No 1/2005. And the Annexes to this proposal.

The PVSGE is a formally constituted group of about 90 European specialised poultry veterinarians, with practical responsibility for the health, welfare, production and food safety aspects of most European poultry production. PVSG has existed for over 50 years and the members are mostly working as private practitioners or are sometimes working for a company (breeding companies, integrations, hatcheries, pharmaceutical companies). Government veterinarians are not eligible for membership. The following 23 countries are currently represented in the PVSG: Austria, Belgium, Bulgaria, Cyprus, Denmark, Estonia Germany, Finland, France, Germany, Great Britain, Greece, Hungary, Ireland, Italy, Latvia, Netherlands, Norway, Poland, Portugal, Romania, Spain, Sweden, Switzerland.

Summary:

Transport of livestock is inherently stressful since most animals or birds do not understand the concept of transportation and transportation necessitates removal of the animal from its familiar surroundings and placement in the case of poultry into a container. In addition, there will usually be interactions with unfamiliar stock people, unfamiliar auditory and motion stimuli which can result in additional stress to the animals. However, modern poultry production is structured to mitigate disease challenges with the majority of sites being single age and thus it is inevitable that transportation of poultry will be required. The aim of all poultry producers should be to mitigate these stressors as much as possible. A commonly accepted welfare outcome of stress in transported poultry is dead on arrivals (DOA). Recent published papers^{1,2} demonstrate low levels of dead on arrivals in large numbers of broilers transported to slaughter in the EU using the existing transport methodologies and these figures have shown considerable improvement compared to earlier studies.

Whilst we welcome any legislation that improves welfare, it must be based on sound science and current transport data. Furthermore, any changes in legislation should be cognisant of the environmental impact those changes may have and ensure that any additional administrative burdens will deliver real positive impacts on animal welfare. We are concerned that some of the proposals

highlighted below will not necessarily deliver improved welfare but will impact adversely on sustainability of the poultry production in the EU.

Background:

The proposal states that one of the objectives is as follows: *"This revision seeks to contribute to sustainable agricultural and food production by ensuring a higher level of animal welfare and avoiding distortions on the internal market thereby contributing to a shift towards economically, environmentally and socially sustainable food systems as set out in the Farm to Fork strategy"*

Unfortunately, some of the specific proposals in these documents, which will be highlighted later, will result in **lower economic and environmental sustainability** with no clear improvement in welfare outcomes for the animals being transported.

The proposals rely on EFSA recommendations for limiting journey times, increasing space allowances and establishing upper critical temperatures during transport. However, we would draw your attention to the two recently published papers on transport of large numbers of broilers in UK¹ and Germany² where in particular stocking density in transport did not have a significant impact on Dead on Arrival (DOA) rates. DOA rates are a key welfare indicator for transportation of animals. These papers did not include journey times in excess of 12 hours however we outline some specific issues related to extended journey times below. Whilst we agree that transporting birds during periods with higher ambient temperatures, especially over 30°C, can result in increased stress and DOAs, transporters can mitigate the impact of these higher ambient temperatures with practical interventions such as down stocking and adjusting transport times to cooler parts of the day.

Specific comments:

Definitions:

4. Journey means the movement of animals effected by one or more means of transport starting with the loading of the first animal into the first means of transport at the place of departure and ending with the unloading of the last animal at the place of destination.

We consider that in the case of poultry as they are carried in containers "journey" should apply only to the period when the vehicle wheels are turning.

Article 5 Application for organiser authorisation for longer journeys

The proposal it that this should now apply for journeys over 9 hours, reduced from 12 hours. We are not aware of any specific scientific evidence that supports the reduction of journey times from 12 hours down to 9 hours. As a result, we see requiring and application for organiser authorisation for journeys over 9 hours as an unnecessary administrative burden that will not necessarily contribute to improved animal welfare.

Article 17: Obligations for keepers prior to the journey

2. loading of animals on means of transport shall be supervised by a veterinarian

Currently there is a huge shortage of veterinarians in the EU and especially those with expertise in poultry. It is unrealistic and disproportionate to require a veterinary surgeon to physically supervise every loading of animals onto the transport vehicle. This is especially the case when small groups from larger flocks are loaded over a period of several days (e.g. transfer of layer pullets) or when several loadings happen at the same time at different farms. This unnecessary administrative burden will not necessarily improve animal welfare. We would propose that staff responsible for loading and unloading animals should have been trained and be able to demonstrate competence in this responsibility.

Article 19: Obligations for organisers, transporters, drivers and attendants during transport by road and rail.

1. The driver or attendant shall check on the animals at least every 4.5 hours to assess their welfare and fitness for transport.

For transport of poultry in containers, it will be practically difficult to access and view all the birds, in all the containers, on a vehicle once loaded. Stopping the vehicle to inspect the birds would add to journey times and affect airflow through the vehicle. We do not believe there would be any demonstrable benefit to animal welfare by making this a legal requirement. In fact, it is likely to have a negative impact on animal welfare.

Article 25: Obligations at the place of destination

3. Unloading shall be supervised by a veterinarian

Currently there is a huge shortage of veterinarians in the EU and especially those with expertise in poultry. This unnecessary administrative burden will not necessarily improve animal welfare. We would propose that staff responsible for unloading animals should have been trained and be able to demonstrate competence in this responsibility.

Article 27 Journey times, rest periods, feeding and watering intervals during transport of adult terrestrial animals by road and rail for long journeys

*This article excludes domestic birds and rabbits and **chapter V of Annex 1** applies. The specific maximum journey times are defined as follows:*

12 hours including loading and unloading for journeys including those to slaughterhouses

24 hours for chicks of all domestic bird species if it is completed within 24 (48) hours after hatching

10 hours for end of lay hens including loading and unloading.

We do not understand why it is necessary to legislate a maximum journey time of 12 hours for adult birds. Rearing birds usually have a maximum daylight period of 8 hours and thus will spend 16 hours in the dark without feed or water to prevent ovarian stimulation. Since they will be used to these feed and water restrictions there is no rationale to then limit journey times to 12 hours. Most pullet transfers from rearing to laying take place at night when the birds would expect to be roosting and are content to be without feed and water.

We have concerns that these maximum journey times are impractical for many poultry journeys in EU. In the case of chicks, there are limited numbers of primary breeding stock hatcheries for both broiler parent and commercial layer hatcheries in the EU. These are specialist operations with highly skilled operatives and equipment and thus not present in all European countries. Breeding companies in the EU have a good record of low transport DOAs for day old chicks even with longer journey times. Whilst we support the principle of shorter journey times, we do not see the necessity to change the current legislation. Reducing journey times for chicks of all domestic bird species from the current maximum of 72hours will have significant impacts on the sustainability of the European Poultry Industry.

We are concerned with the limitation on journey times for end of lay hens. Within the EU there are limited number of processing plants that will slaughter end of lay hens. Restricting journey times to 10 hours for end of lay hens will mean some poultry producers will not legally be able to send their hens to slaughter without exceeding this maximum journey time. The only option for producers will be to kill the birds on site and dispose of the carcasses to rendering. This is contrary to the EU objectives of environmental and economic sustainability.

Point 2.1 should be deleted. It is not feasible, desirable or necessary to give feed and water for birds intended for slaughter during transport. For food hygiene reasons, birds should be fasted to avoid bacterial contamination (e.g. campylobacter) of carcasses through faecal contamination or intestinal breakage at time of evisceration. Current legislation should be maintained.

Annex document Chapter VII Space allowance for transport by road, rail or sea.

Chapter III Transport Practices

3. Handling

We welcome the amendment in this proposal that "allows poultry and rabbit to be lifted by the legs" It is common practice across the EU when manually catching birds to catch them by the legs and EU 1/2005 specifically prohibited this which is widely accepted was an oversight in drafting of the original legislation.

However, it is important to note that waterfowl should continue to be caught by the neck and this should be reflected in the legislation as catching waterfowl by the legs can result in injury to these birds.

From a practical as well as scientific point of view, it is important to accept that poultry covers a number of species, which will differ in size and husbandry techniques. Therefore, it is important that any changes to legislation should follow from in-depth research and feasibility studies to ensure amendments are both based on good science and practical approaches.

This annex also prohibits "(c) suspend *the animals themselves by mechanical means*" This needs clarification as mechanical harvesters are employed to catch poultry in some companies. These systems are welfare friendly and should not be prohibited by poorly drafted legislation.

Minimum vertical height

The annex states that "*For domestic birds the height of the container shall be such that the comb or head does not touch the ceiling when the birds sit with their head and neck in a natural position or when they change position*"

We have concerns that this is ill defined, especially when birds change position as to allow them to hold their heads in a natural position will require transport containers with much greater headroom. This will again add additional environmental and financial burdens on the EU poultry industry without demonstrable improvements in animal welfare. It is generally agreed that increased container height will increase the risk of scratches and injuries in birds when changing position which is in contradiction to the intended aim of the legislation.

Chapter VII of the Annex lays down specific space allowances for all species.

We disagree that the proposed space allowances will improve welfare of poultry during transport. We have referenced two peer-reviewed papers, which report low mean DOAs 0.08%¹ and 0.09%² for broiler transport using the current stocking densities. We do not believe that any significant improvements on these key welfare indicators will be made by increasing space allowance. However, we can expect increased injuries during transportation due to slippage, wing flapping and over treading if space allowance is increased. These will negatively impact on the welfare of the birds and increase processing plant rejects with consequent reduction in usable product. During periods of hot weather transporter



may decide to down stock numbers of birds in crates, however increasing space allowances on all journeys should not be mandated.

Beside the mentioned welfare, hygiene and health aspects, the intended space requirements have been estimated to have a significant impact on the sustainability of poultry production, as many more vehicle journeys will be required to move the same volume of poultry. This will require more vehicles on the road, more fuel to power the journeys and more water to wash the transport vehicles and containers between transports. Estimates undertaken by industry bodies across the EU estimate the journey requirements will increase by between 35% and 65%. Furthermore, significant investment in all areas of the poultry processing will be required to fulfil these proposals. A detailed impact assessment of the costs, both financial and climate-related, needs to be undertaken to demonstrate that these proposed stocking densities in transport will significantly improve welfare outcomes without imposing environmental and financial cost on the poultry producers.

Conclusions:

In conclusion, the PVSGE are in favour of improvements to all aspects of animal welfare be this on farm, during transportation or at the time of killing. However we consider that several of the proposals in “REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of animals during transport and related operations, amending Council Regulation (EC) No 1255/97 and repealing Council Regulation (EC) No 1/2005. And the Annexes to this proposal” will not necessarily deliver improvements in animal welfare as demonstrated by recent peer reviewed papers. Proposals to change legislation must be based on robust science and experience and not on misconceptions or assumptions. Furthermore some of the proposals will have significant environmental and financial impacts and thus not fulfil the objectives of the legislation to improve sustainable agricultural and food systems within the EU

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References:

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2. Gickel, J.; Visscher, C.; Kemper, N.; Spindler, B. Analysis of the Broiler Chicken Dead-on-Arrival (DOA) Rate in Relation to Normal Transport Conditions in Practice in Germany. *Animals* 2024, 14, 1947. <https://doi.org/10.3390/ani14131947>

