

## **COM/2023/770 Proposal for a Regulation on the protection of animals during transport and related operations.**

### **Written answers from the Department of Agriculture, Environment and Rural Affairs**

#### **Q1. Can you detail some of the benefits of the proposed Regulation?**

A1. The proposal is intended to put in place revised European legislation, which utilises the latest scientific evidence, to enhance welfare protections for animals being transported in connection with an economic activity, within the European (EU) Union and to or from the EU to third countries.

The draft Regulation focuses on 7 specific objectives: reduce travel times, increase minimum space allowances, reinforce rules for the transport in extreme temperatures, address the specific needs of vulnerable animals, improve enforcement through digitalisation, improve conditions of transport of animals exported from the EU, and expand EU rules for the transport of dogs and cats.

#### **Q2. Can you detail some of the costs of the proposed Regulation?**

A2. The European Commission has assessed some potential costs of the regulation as follows:

##### **Space Allowances**

This is expected to bring significant animal welfare benefits but is likely to result in additional costs for transporters due to the necessity to buy additional trucks, as the new rules are expected to result in an increase in the number of transport hours and costs.

The data provided by the Commission suggest at an EU level, the yearly net aggregated costs will vary depending on the animal species and categories transported, ranging from 35 million Euro for the transport of laying hens to EUR 1.069 million Euro for the transport of beef cattle. The majority of these costs comes from increased space allowance and fall on transporters. The Commission data says this corresponds to an increase of production costs of 1.4 cents per kilo of meat, milk, or eggs produced.

##### **Export of live animals**

Regarding maritime transport, the average cost of training of an animal welfare officer per person per year is estimated to 241 Euro. An increase of the enforcement costs associated with the option of upgrading standards for livestock vessels could be expected.

##### **Transport of Vulnerable Animals**

Unweaned animals, such as calves, lambs, kids, piglets and foals, are considered vulnerable animals and exposed to welfare and health risks during transport. The

draft regulation proposes that these animals can only undertake longer journeys if an effective system for feeding them is in place on the transport.

Where feeding systems are deployed this would allow for the transport of calves, for example, up to 19 hours and would mitigate the negative economic impacts of a maximum journey times of 8 hours.

The cost for installing a feeding system in an existing truck is estimated to be between 25,000 Euro to 30,000 Euro while a new truck equipped with such a feeding system is estimated to cost around 500,000 Euro. Due to the higher age of the calves, the current three-decked trucks will need to be transformed in two-decked trucks, which will incur limited costs for transporters.

The new requirements are estimated to increase the cost for dairy farmers of keeping the animals longer on farms. However, the selling price of the calves would be higher since they are stronger. An improved health status and reduced mortality of calves upon arrival due to increased resilience is also beneficial for fattening farms. Therefore, overall, the impact is expected to be positive for most farmers.

A transition period of 5 years is proposed, as Member States impacted by this measure need time to restructure their sector.

### **Transport in hot temperatures**

The Commission believes that transporters may see an increase in their costs due to higher wages for night-time driving but also higher administrative costs when inspections and checks have to be performed during the night. A limited impact is also expected on farmers and slaughterhouses.

### **New technologies**

Real-time tracking systems will make it possible to better target and perform more efficiently official controls with the help of the central EU database, resulting in improved animal welfare. Since more than 77% of the current transport trucks are already equipped with a tracking system, the operators' costs for meeting the new standards would be marginal.

The administrative burden for transporters is expected to decrease substantially with the use of an automated tracking system and IT platform.

### **Better protection of cats and dogs transported for commercial purposes**

Additional veterinary health checks of the cats and dogs may cost between 10 Euro and 40 Euro per animal. The economic impact of the new requirements for feeding and watering are expected to be limited, since relatively similar rules apply already.

Additional costs for transporters may also be expected, related to the improvement or replacement of their current vehicles to meet the new standards may be expected. A commercially available new dog trailer without air conditioning but properly

designed is estimated to cost between 1,000 Euro and 3,000 Euro for two to four dogs.

**Q3. Are there elements of the proposed Regulation which would have a significant impact in Northern Ireland?**

A3. The proposal, if implemented, will have an impact on any persons undertaking the transport of vertebrate animals, fish, cephalopods, and decapods, within Northern Ireland or from Northern Ireland to an EU member state or Third Country, when that journey is related to an economic activity.

**Q4. Have you / do you intend to carry out an assessment of the financial impact of the proposed Regulation on farmers?**

Q4. No dedicated analysis has been undertaken. It is the Department's understanding that draft regulation is subject to ongoing discussions and the current published version may not reflect the content of any final adopted version.

**Q5. Can you give an update on engagement with stakeholders and any concerns which have been raised?**

A5. The Department is aware of concerns raised by the Ulster Farmers Union and the poultry industry. However, there has been no formal engagement with the agri-food industry, given the regulation is not yet in final form and the Department understands the provisions could be subject to substantial revisions, as member states review the proposals.

**Q6. Has DAERA engaged directly with stakeholders? If so, what concerns and issues have been raised? Have these then been communicated to UKG?**

A6. The Department is aware of concerns around journey times for end-of-life laying hens, which have been raised by the industry here. We understand that those concerns are common across the island of Ireland and within the wider European industry. It is understood that representations have been made to the Commission directly by the industry and to other member states regarding journey times and potential impacts. DAERA and Defra officials have discussed these concerns, informally.

**Q7. Can you provide more detail on your engagement with Defra?**

A7. DAERA has regular meetings with Defra officials to discuss welfare during transport matters. This includes sharing information on the development of the European Regulation, where information has been made publicly available.

**Q8. Has this proposed Regulation been discussed under the Common Framework and have any issues been raised?**

A8. DAERA and Defra have well developed structures to discuss animal welfare matters, which have now been formalised as part of the Common Framework processes. The issues raised in those discussions are reflected in previous answers

**Q9. Can you give an update on any engagement to date that has occurred in the Joint Consultative Working Group with the EU?**

A9. UK Government has advised that the Joint Consultative Working Group is a confidential forum.

**Q10. At the meeting of the Trade Specialised Committee on Sanitary and Phytosanitary Measures under the EU-UK Trade and Cooperation Agreement on 21 October 2024, the EU and UK discussed their respective legislation on animal welfare. Officials from the Northern Ireland Executive were present as part of the UK delegation. Were any concerns about the proposed legislation raised at this meeting?**

A10. UK Government has advised that no concerns about the proposed legislation were raised at this meeting.

**Q11. Has UKG provided you with an update on its policy intentions in this area?**

A11. UK Government has advised that they are engaging with key stakeholders as part of the development of an overarching approach to animal welfare. UK Government officials say will be outlining more details on this in due course.

The UK Government have stated that it is seeking to negotiate an SPS agreement with the EU and are working closely with the devolved governments in Scotland, Wales and Northern Ireland to ensure that their interests are represented.

**Q12. Can you comment on the concerns raised by the UFU?**

A12. The Ulster Farmers Union (UFU) responded to the European Commission public consultation and also used recent stakeholder engagement sessions with the DAERA Minister to raise some of their concerns at the detail found in the new proposal.

The UFU has raised concerns on proposals on shared/ borrowed vehicles; distances/ journey times; veterinary supervision of the loading and unloading of animals; space allowances, creating a need for additional vehicles; and restrictions around transporting unweaned calves.