

Mrs. Androulla Vassiliou
Commissioner for Health
European Commission
1049 Brussels

Brussels, 8 April 2009
09/15

Dear Mrs. Vassiliou,

Subject : Draft Commission proposal on travelling times, space allowances and navigation systems

Eurogroup for Animals has welcomed the announcement that the Commission is currently preparing a proposal to improve the welfare of transported animals. From the stakeholder consultation we understood that the Commission wanted to review the existing rules to ensure consistent implementation of Regulation 1/2005, to introduce stricter measures for the transport of slaughter animals and to improve enforcement by aligning the provisions on animal transport with social legislation concerning the maximum driving hours for transporters.

We are however very concerned that the text currently in Inter-Service consultation will not reach these objectives and some amendments will even weaken the protection of transported animals. In addition we believe that the proposed provisions will be difficult to apply due to lack of precision and several derogations with no clear specifications.

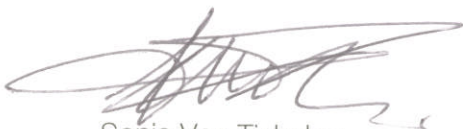
Among other aspects we are concerned that:

- Unrestricted exemptions to the nine hours limit for slaughter animals could be granted by Member States, and that the definition of slaughter animals could make it very easy for transporters to avoid the journey limit and declare the animals as further fattening;
- Further fattening animals would be transported longer and with fewer rest than in the present Regulation which has serious consequences for their welfare;
- No legal basis for authorities to be able to control transports in real time is provided in the current text.

To ensure that this proposal constitutes a genuine improvement of animal protection on the ground we believe these issues need to be addressed before the proposal reaches approval by the Commission College. We are available to constructively work with your services towards that aim.

I would like to meet you to provide you with further details and to discuss how we can ensure that this proposal can count on broad political support.

Yours sincerely,



Sonja Van Tichelen
Director

cc: Philip Tod
Andrea Gavinelli