



## MEP HORSE GROUP – 21<sup>st</sup> June 2022

### Welfare of equines in Transport

The report of the European Parliament Inquiry Committee on the protection of animals during transport was adopted in January 2022 and will help the EU Commission in the general revision of the animal welfare legislation that will occur in the upcoming months.

The European equine industry could be highly impacted by possible new requirements. Movements of horses are essential for the European equine industry (e.g., for racing, competitions, breeding or sales purposes).

- In 2019, around 87,817 equines were transported alive between EU Member States and from the EU to third countries.
- It is estimated that around 58% of live equines transported between the EU Member States (MS) were not intended for slaughter.

If transport can be a cause of stress and strain for equines (adaptation, confinement, restricted space and field of vision, physical exertion, noise, climatic conditions), horses moved for sport, races or breeding are transported in good conditions.

**The European Horse Network has followed the investigation and provided factual information and evidence. It is important, at this stage to dialogue with MEPs and representatives of the EU Commission to prepare together the future requirements and contribute to the future EU Animal Welfare strategy, planned for this autumn.**

Live animal transportation in general is currently under quite a lot of pressure, and that also includes equines.

Thanks to European and National legislations, the conditions in which horses are being transported have clearly improved over the past years. The condition of the horse at departure has been redefined, documentation was reconsidered, vehicles need to comply to minimum standards nowadays and, thankfully, drivers and handlers are submitted to better training methods.

Despite these efforts, incidents where the welfare of equidae has not been respected, are still reported. For EHN horse welfare is a top priority and the topic is on our agenda at every single meeting.

#### 1. PRIORITY

Traffic circumstances have drastically changed over the past 10 to 20 years and vehicles with live animals / horses are far more confronted with traffic jams.

Controls for customs, security or veterinary purposes at borders (including airport) are also taking more & more time while animals have to stay and wait to be released – sometimes in extreme weather conditions. Despite automated and digitalized systems, congestion is the

main reason for the longer delays. Congestion due to a shortage of staff and increased volumes of goods being shipped.

If we do not want to further compromise the wellbeing of horses and other animals being shipped, we suggest creating priority procedures and priority lanes at borders, as well as traffic emergency & priority procedures.

Also in the current legislation stipulating driving & resting times for commercial drivers, there are a few possible exemptions under which drivers can extend the allowed driving times. Unfortunately, these 'exemptions' are being interpreted in different ways in different Member States, **so an update and clarification of those exceptions, specific for transport of horses or live animals in general would be appreciated.**

## 2. TEMPERATURE RANGE

Current legislation does not allow horses to be shipped below 5°C and above 30°C. What is the basis for defining those limits?

Horses in southern Europe (Spain, Portugal, Italy...) are exposed to temperatures far above 30°C and for longer periods, without significant problems related to the heat, probably because they are used to it.

Horses in northern Europe (Sweden, Finland, ...) are exposed to temperatures far below 5°C for several months in a row, without significant problems related to the cold, probably because they are used to it.

Two examples just to show you that the current temperature range might not be the best solution. **We ask for an expert panel to reconsider these circumstances, bearing in mind as well the current and future impact of climate change.**

## 3. VEHICLE DESIGN

When talking to various manufacturers of horse trucks & trailers, as well as builders of other livestock vehicles, we have learnt that insulation of vehicles as well as ventilation systems have remarkably improved over the years. However, one should remember that it is impossible to maintain a temperature below 30°C inside a vehicle for example when the outside temperature is 40°C or more, unless an Air Conditioning system is being installed. But, this is not a real, practical solution since the majority of horses in Europe are not familiar with A/C and such a system would rather make our four-legged friends ill, instead of improving their wellbeing.

**We ask for a working committee to investigate and discuss the design, construction and used techniques in horseboxes and live animal transporting vehicles. The group should consist of veterinarians as well as design engineers, manufacturers and technicians.**

## 4. VAT

We are witnessing big differences in interpretation of VAT rules in different Member States. Now that there is an opening for applying a lower VAT tariff on equine activities, we are pointing out the following issues:

In most EU member states, an equestrian professional, who holds a valid VAT number, can deduct or claim the VAT amounts that he or she has paid on professional purchase.

A horsebox / truck, designed and used with the sole purpose to bring horses to and from an event (whether a race or competition) and where the groom or owner has the possibility to sleep in that vehicle, is – in my humble opinion – an important but professional investment where the VAT is fully refundable on condition that the owner is a professional, holding a valid VAT number covering his or her commercial activities.

It appears however that financial authorities in some Member States do not always think the same and they do not allow professionals to have VAT fully or even partially refunded.

In France for example, a recent court decision decided that vehicles built for the transport of horses, but containing also some kind of sleeping accommodation, are considered as 'mixed use' – like a mobile camper - and consequently the owner is not allowed to claim the VAT on his investment.

**So, EHN and its Members would welcome a clarification and a coherent implementation of VAT legislation in all Member States.**

## 5. DIVERSIFICATION

Although EHN fully agrees that EU legislations have positively contributed to an increased welfare situation, we feel that current legislation only determines two main categories of horses: registered and non-registered horses.

We need to think if this is still the correct distinction we need to make. Why? Because there many more different categories of horses then just registered or non-registered. Horses are transported for various reasons: racing, breeding, participation in equestrian sports, leisure riding, trade and also for slaughter.

The majority of the calamities reported, do not involve the racing/sport/leisure horse, but a different kind of horse; the slaughter horse?

The owner, handler and driver taking a racing or sport horse on the road has the sole interest of delivering the horse to it's final destination in the best possible condition. Transporting the equine athlete or companion in other than optimum conditions could have a big financial impact, even seriously harm a business.

If legislation needs to be revised to avoid further violations in animal welfare by a specific different subsector, we feel the whole equestrian sector should not be impacted.

The economic and welfare aspect of racing- sport- and leisure horses is completely different to f.e. slaughter horses and legislation should also make that difference. We would encourage a separate legislation for the transport of race/sport/leisure horses, if not at least well described and clearly determined exemptions in current and future legislation.

**The horse racing and equestrian industry believe more in better implementation, compliance and enforcement of the existing legislations, rather than being confronted with new conditions that would incur additional difficulties and costs for the sector.**

### Speakers

Barbara Padalino, researcher, University of Bologna, Department of Agricultural and Food Sciences, Division of Animal Sciences – “Effects of the journey and journey conditions on horse health and welfare”

Filip Vande Cappelle, CEO of European Horse Services and member of the Board of the Animal Transportation Association

Alana Chapman, Research and Education Officer of the World Horse Welfare

Stanislav RALCHEV, policy officer at DG SANTE on Animal Welfare and Antimicrobial Resistance - “An update on the revision of the EU legislation of the protection of animals during transport”

