

POSITION ON EFSA'S SCIENTIFIC OPINION THE WELFARE OF HORSES DURING TRANSPORT



The EFSA's scientific opinion on transport of live equidae has been published on September 7th 2022. This document brings to light the importance of transport in horses' life:

- According to TRACES around **170 000 horses** were transported between member states per year between 2019 and 2021 across all means of transportation ;
- Road transport represents **85%** of total horse transport.

In this document, the EFSA detailed potential risks for horses at every stage of transportation. The agency also identified conditions that could help to reduce negative consequences to horse welfare. The EHN particularly welcomes:

- the emphasis on training and experience of operators and handlers as one of the most important preventive measures to protect welfare;
- the data showing that well-handled and fit horses travel better;
- the fact that the report takes into consideration that journey time is not the only factor that can affect the welfare of horses during transportation. The time that a horse is able to spend in transportation without detriment to its health or welfare is highly dependent on transport conditions and the prior state of health of the horse in question. EHN agrees on the importance of conducting more studies on time limits, taking into consideration these variables.

Nevertheless, EFSA's recommendations also raised many concerns for the equine sector.

The implications of new space allowances

More space gives horses the liberty to move as they please and adjust their position as they best see fit. That is why the EFSA recommends adding at least 40cm to the width of the animal's widest point and 40 cm to its length (Rapport EFSA p.99-100). However, research also shows that horses' most comfortable way of travel is being transverse to the driving direction and with a slight angle (« herringbone » A.E Gibbs, T.H. Friend). **The width of vehicles is limited to 2,55m, which makes it impossible to fulfil both these recommendations at the same time.** It means that horses will have to be loaded in the driving direction.

In addition, more space for each horse would mean fewer horses in vehicles and therefore more vehicles transporting live animals. Currently, a truck can transport 9 to 10 horses. This number would be reduced to six horses per truck. This would multiply the number of vehicles needed to transport the same number of animals, with negative impact on the costs of the transportation for the owner, on traffic and on carbon emissions. In any cases, a unique rule for equidae of different sizes and weights would be inappropriate.



Adding more space for the horse also means an increased risk of self-inflicted injuries and risk of hurting their handlers. As highlighted in the scientific opinion, transport is a stress-inducing experience for equidae (Rapport EFSA p.64), it is hence important to ensure that the space given to them does not enable them to injure themselves or others. The Committee of ministers of the Council of Europe supported this same idea in their recommendation n°(87)17 with the paragraph III.1.4 stating *“Care must be taken to ensure that partitions do not encroach upon the available space. Under-stocking can result in injury if the animals are thrown about by the motion of the transport, and in these circumstances extra partitions should be provided for support”* (Recommendation (87)17 Committee of ministers to Member States on the transport of horses, 17 September 1987):

EHN requests policy-makers to take into consideration the impossibility of reconciling EFSA's recommendations on space with horsebox configurations which best support horse welfare, their negative impact on sector costs and the environment and the potential welfare risks that they would introduce. The upcoming legislative proposal should take into consideration the latest scientific evidence in terms of space allowance and focus on the importance in promoting horse welfare in transport, suitable vehicles and trained handlers and drivers

25°C temperature inside the vehicle

Setting a maximum temperature of 25°C inside the vehicles will greatly restrict transportation with a high impact on the industry.

The horse sector has always been opposed to a single range of temperature imposed throughout Europe, when each country has its own climate and consequently, each horse, depending on their climate of origin, is more or less used to certain temperatures. In that regard, horses in the south of Europe (eg Portugal, Spain, Italy and Greece) exercise and compete at temperatures up to 40°C and higher without welfare consequences and, in the same vein, in the north (eg Norway, Sweden, Denmark and Finland) horses exercise and compete at temperatures down to -20°C and below. Therefore, imposing a standard maximum temperature inside vehicle does not guarantee better welfare for all equidae when some of them are used to living in higher temperatures, especially when the methods to control the temperature inside a vehicle are limited, as horses cannot handle air conditioning.

Vehicles in motion can generate an airflow and lower the temperature thanks to the wind flow and the mechanical ventilation. This airflow comes to a stop when the vehicle is no longer in motion, thus, traffic jams and resting times for drivers at parking lots are important risks to horses' welfare.

Setting a temperature limit at 25°C with no regards to the outside temperatures will be harmful to the equine sector, especially shows and race organisers. The sector is already affected by extreme weather conditions as the past heat waves have shown, maintaining a 25°C temperature inside a vehicle during the summer will impose a heavy burden on transporters. It would be impossible for competitors / owners to reach races or equestrian events in the summertime.

Regarding temperatures, more scientific knowledge is needed to define relevant limits and restrictions. The temperature experienced by horses during transport, especially during long journey, is likely to range. Research studies measuring the impact of these fluctuations on horses is limited. Although high temperature negatively impacts welfare, there is insufficient scientific evidence to identify what the upper temperature should be to transport horses in good conditions.

During the summer of 2022, the NVMA (Netherlands Food and Consumer Product Safety Authority) carried out 200 inspections on equine transports with specific regard to animal welfare. They reported four violations of the legislation on animal welfare during transport. Thus, 98% of inspected vehicle were compliant.

Therefore, we recommend allowing vehicles transporting livestock to use the hard shoulder to avoid traffic jams and to provide designated parking spaces for livestock vehicles with a shelter at parking lots. We emphasise the importance of supporting innovation to develop new technologies to mitigate temperatures within vehicles. EHN would also like the EFSA to substantiate any temperature restrictions with scientific evidence.

Transport by ferry (RORO)

The report recommends counting ferry transport as journey time with the driver needing access to his/her vehicle. This recommendation would be very difficult to implement and would *increase* the journey time for horses. Ferry transportation is very common especially for thoroughbreds, for example between France, Ireland and Great Britain.

Equine activities and the equine industry rely on the facility to move horses for many purposes (breeding, sport, races, tourism, slaughter...). **That is why the European Commission and policy makers should work in close collaboration with the equine sector in order to come up with a legislation that will set realistic and manageable obligations, which will strengthen horse welfare without putting the different actors of the sector in a dire situation.**



Key figures on the European equine industry

7 million
Equines

6 million
Hectares of
grassland

800 000
People
employed

100 billion
€/year
Economic
Impact

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