

14/05/2020

Email sent to EU Commission, Dr. Bernard van Goethem from email address:
Lesley@eyesonanimals.com

Dear Dr. Bernard van Goethem,

For the past 20 years Iris Baumgaertner and myself have been investigating the welfare of animals being transported and an on-going issue that does not seem to be clear for everyone is about Roll-On Roll-Off transport. There seems to be a general census among Livestock transporters that time spent on Roll-On Roll-Off ferries is neutral and exempt from the Watering and Feeding Intervals, Journey Times and Resting Periods stated in Chapter 5 of Annex 1 of EC 1/2005. I would like to kindly request from you at the very earliest convenience a response to the following 4 questions. Thank you

1. In the EC 1/2005 legislation there are clear rules regarding **Watering and Feeding Intervals, Journey Times and Resting periods.**

I understand that during transport by Roll-On, Roll-Off, when animals are on board trucks which are on board ferries, **the journey times and resting periods can be altered due to the circumstance of being stuck on a boat and unloading being impossible, but may the watering and feeding times also be extended ?** Can animals be withheld from water and feed for longer periods of time on Roll-On Roll-Off situations than compared to when they are on the trucks driving on the road ?

2. If so, please can you show me where in the EC 1/2005 legislation it is stated that animals can be withheld from water and feed for longer intervals on Roll-On Roll-Off than on road?
3. If so, please can you inform me of the maximum intervals that animals can be withheld from water and feed on Roll-On and Roll-off in order to prevent severe dehydration and starvation and where can these maximum times for Feeding and Watering animals on Roll-On Roll-Off can be found in the legislation ?
(Considering that there are some roll-on roll-off ferries of even 40 hours within Europe – to the Canary Islands)
4. If you answer no to Question 1, can you confirm that this means that animals loaded on a truck, embarked on a Roll-On Roll-Off ferry must be allocated water and feed at the same intervals as noted in the EC 1/2005 Chapter 5 Annex 1, 1.4 a,b,c and d? (for example that weaned cattle must receive liquid after 14 hrs and liquid and feed after 28 hrs and unweaned cattle still on a milk diet must receive liquid after 9 hrs (and if necessary feed) and feed (nutritional liquid) after the second phase of 9 hrs (thus 18 hrs) ?

For ease I have copied out the sections of the EC 1/2005 pertinent to this discussion.

Chapter V of Annex 1 of the EC 1/2005 is about intervals of be respected for **WATERING and FEEDING, JOURNEY TIMES** and **RESTING PERIODS**

Here it is stated:

1.2 Journey times for animals belonging to the species referred to in point 1.2 (domestic Equidae, except registered Equidae, domestic animals of bovine, ovine, caprine and porcine) shall not exceed 8 hours.

1.3 The maximum journey time in point 1.2 may be extended if the additional requirement of Chapter VI (Additional provisions for long journey) are met.

1.4 The **watering and feeding intervals**, **journey times** and **rest periods** when using road vehicles (which meet the requirements in point 1.3) are defined as follows:

a) unweaned calves, lambs, kids and foals which are still on a milk diet and unweaned piglets must, after 9 hours of travel, be given a rest period of at least one hour sufficient in particular for them to be given liquid and if necessary fed. After this they may be transported for a further 9 hours.

d) weaned bovine, ovine and caprine must, after 14 hrs of travel be given a rest period of at least one hour sufficient for them in particular to be given liquid and if necessary fed. After this rest period, they may be transport for a further 14 hrs.

1.5) After the journey time laid down, animals must be unloaded, fed and watered and be rested for at least 24 hrs.

Alterations made for transport by water:

1.7 (a) Animals must not be transported by sea if the maximum journey time exceeds that laid down in point 1.2 (point 1.2 : Journey times for animals belonging to the species bovine, ovine, caprine and porcine ... shall not exceed 8 hours) unless the conditions laid down in points 1.3 and 1.4, apart from **journey times** and **rest periods** are met (implying **Watering and Feeding Intervals** still apply because these are not mentioned after the word “apart from” – correct ?)

(b) In the case of transport by sea on a regular and direct link between two geographical points of the Community by means of vehicles loaded on to vessels without unloading of the animals (Roll On Roll Off), the latter must be rested for 12 hours after unloading at the port of destination or in its immediate vicinity unless the journey time at sea is such that the voyage can be included in the general scheme of point 1.2 to 1.4.

With best wishes,
Lesley Moffat
Director- Eyes on Animals

Iris Baumgaertner
Head of Investigations – TSB|AWF

Important request for EU commissions' interpretation - Message (HTML)

You forwarded this message on 27/05/2020 14:40.

From: Lesley Moffat <lesley@eyesonanimals.com>
To: 'bernard.van-goethem@ec.europa.eu'
Cc: Margreet Steendijk (margreet@eyesonanimals.com); madelaine@eyesonanimals.com; monique@eyesonanimals.com; Peter Stevenson (Peter.Stevenson@ciwf.org); SebA (sebastien.ar@i214.com); Isis La Bruyère (isis.la@i214.com); Ethical Farming Ireland <info@ethicalfarmingireland.com> (info@ethicalfarmingireland.com); 'Nicola Glen', Iris@animal-welfare-foundation.org; Alexander Rabitsch (animalwelfare@rabitsch-vet.at)
Subject: Important request for EU commissions' interpretation

Sent: Thu 14/05/2020 21:45

Dear Dr. Bernard van Goethem,

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15:43
15/06/2020