



## FVE Priority Voting Topics and Recommendations for EP vote on the revision of EU Animal Transport Regulation

November 2025

**Intro:** Over the past decades, FVE has been actively engaged in shaping and improving EU rules on the transport of animals. Veterinarians play a central role in ensuring animal welfare during transport from assessing animals' fitness for travel, to authorising journey logs, to oversee loading and unloading, to monitoring conditions and compliance throughout the journey. Their expertise is vital for safeguarding both animal health and public trust.

FVE strongly welcomes the European Commission's (EC) proposal to revise Regulation (EC) No. 1/2005. The revision addresses long-standing gaps and aligns provisions more closely with current scientific knowledge and technological progress. An update was urgently needed because:

- Many annexes (e.g. journey times, space allowances) remained unchanged for over 30 years.
- Several provisions lack clarity, and in consequence, create legal uncertainty, an uneven playing field among Member States, and difficulties in enforcement, especially for cross-border transports.
- Repeated serious incidents highlight the urgent need for stronger safeguards. These incidents not only cause animal suffering but also undermine public trust in the animal transport sector.

Animal transport carries **serious implications for both animal health and welfare as well as collateral risks to public health**. Movements of live animals create pathways for infectious diseases to spread rapidly between farms, regions, and even across borders. Outbreaks linked to transport of animals, as for example seen for the Lumpy Skin Disease Outbreaks in 2025<sup>1</sup>, not only endanger animal health but also threaten food security, trade, and public confidence in the sector. Transporting animals in poor conditions or at particularly vulnerable stages increases their susceptibility to illnesses, such as diarrhea or pneumonia in calves, which can lead to higher antibiotic use and, in turn, fuel antimicrobial resistance (AMR)<sup>2</sup>. A clear, consistent user-friendly application of TRACES is essential to avoid a fragmented authorisation system for animal transport. Requiring all long-distance transport authorisations to be submitted through TRACES regardless of whether movements stay within one country or cross borders prevents confusion. Harmonised digital procedures also ensure equal treatment of operators and simpler oversight for competent authorities.

The Commission's proposal represents a welcome step forward, introducing improved protection for vulnerable animals, greater veterinary oversight, tighter controls on transport to and conditions in third countries, and more robust contingency planning. FVE welcomes the many European Parliament (EP) amendments that would further strengthen animal protection, legal clarity, and enforcement.

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<sup>1</sup> [https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/777931/EPRS\\_BRI\(2025\)777931\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/777931/EPRS_BRI(2025)777931_EN.pdf)

<sup>2</sup> [pdfs.semanticscholar.org/ef72/8b61de54912f50f333aa1f37006a5b18df3c.pdf](https://pdfs.semanticscholar.org/ef72/8b61de54912f50f333aa1f37006a5b18df3c.pdf)



However, we are deeply concerned that some amendments appear to prioritise facilitating economic activity over safeguarding animal welfare - the very objective of this legislative revision! If adopted, such amendments would not only weaken protection and undermine disease prevention but could even leave the situation worse than it is today.

Below, we set out **our priority issues** with a short explanation of why they matter, followed by a table indicating which amendments we recommend supporting or rejecting in line with FVE's earlier published positions ([LINK](#)).

## 1. Vulnerable Animals

**Why it matters:** Vulnerable animals (including but not limited to young, old, pregnant, immune compromised individuals) require particular protection during transport. Therefore, unweaned calves, heavily pregnant sows and cows (more than 80% of their gestation period), end-of-career hens and dairy cows, and other vulnerable groups are far less resilient to the stress and demands of long journeys. The Commission proposal rightly introduces stronger safeguards for these animals, and any attempt to weaken these provisions would put their welfare at serious risk.

Transporting animals that do not meet the required age that allows them to endure the journey at this critical weaning stage shall not be transported. Transport of too young and/or animals below the threshold weight not only raises serious welfare concerns but also increases the risk of disease outbreaks, often resulting in higher antibiotic use. Young calves and piglets suffering from post-weaning diarrhea are already among the animal groups treated most, in frequency and amount, with antibiotics. Extending journey times or transporting them at poorly chosen stages of development would only exacerbate this problem, undermining both animal welfare and efforts to combat antimicrobial resistance.

| Recommendation | Amendment numbers  |
|----------------|--|
| Support        | 196, 198, 1780, 2225, 2449, 2488-2490, 2493, 2507, 2521-2525,  |
| Reject         | 201, 282-286, 314, 361-362, 369 – 372, 436- 437, 1184- 1185, 1188, 2427-2431, 2437-2446, 2475-2485,2500, 3082-3084 |

## 2. Journey times need to be adapted following scientific evidence

**Why it matters:** The longer the journey, the higher the stress and risk of suffering. The Commission's limits are balanced and aligned with social regulations for drivers' hours. Excluding the loading time will not lead to significant animal welfare improvements. Already in 1991, the [European Court](#) of Justice considered the meaning of 'travel' in the earlier transport Directive 91/628 and ruled: 'Travel', referred to in point 48(4)(d) of the Annex to Council Directive 91/628/EEC of 19 November 1991 on the protection of animals during transport and amending Directives 90/425/EEC and 91/496/EEC, as amended by Council Directive 95/29/EC of 29 June 1995, is to be interpreted as including the time taken to load and unload the animals. This interpretation was brought forward in the current Regulation 1/2005 which



provides in Article 2 that 'transport' means the movement of animals affected by one or more means of transport and the related operations, including loading, unloading, transfer and rest, until the unloading of the animals at the place of destination is completed.

In addition, amendments extending journey times beyond even the current rules would seriously undermine welfare and post a risk for legal loopholes for drivers and attendants.

| Recommendation | Amendment numbers                          |
|----------------|--|
| Support        | 34, 35, 1596,                              |
| Reject         | 609-613, 632-637, 682-703, 1348-1354, 2905 |

### 3. Space Allowances

**Why it matters:** Ensuring adequate space is essential for animal welfare during transport. Animals' body frames changed drastically in the last decades due to major efforts by and dedication of breeders (poultry as an [example](#)) – space allowances from more than 20 years ago do not reflect the needs of these improved genetics. Climate change led to hotter summers, and more days and nights with high temperatures: Animals need more space today than 20 years ago to thermoregulate and improved ventilation will be necessary. Revising space allowances is therefore undebatable in order for animals to adjust their posture in response to vehicle acceleration, turns and deceleration and especially, to hold their head in a natural position to ensure adequate ventilation. On long journeys, animals must also be able to take natural postures, lie down, and move safely, for example, to access water. Increased space reduces stress, injuries<sup>3</sup>, and the risk of heat buildup, making it a critical factor in maintaining welfare and preventing suffering throughout the journey.

| Recommendation | Amendment numbers   |
|----------------|---|
| Support        | 2660, 2719, 2720, 2726, 2728-2732, 2744, 2745, 2756, 2763, 2986, 2990-2991  |
| Reject         | 2661-2684, 2685-2689, 2693-2697, 2699-2700, 2703-2709, 2713-2715, 2717-2718, 2942-2959, 2961-2985, 2987-2989, 2993-3004 |

### 3. Veterinary Supervision is crucial for risky travels

**Why it matters:** Veterinary oversight during loading and unloading is the key moment to ensure that only animals fit for transport are loaded meaning those in good health, free from injuries or wounds, not suffering from systemic infections, and unlikely to become unfit during the journey. This is not just a matter of regulatory compliance; it is essential to prevent unnecessary suffering and ensure all animals travel in the best possible health condition. Once animals are on the move, it becomes much harder to intervene if their health deteriorates. Immediate care or suitable unloading facilities are often unavailable, which can lead to serious welfare problems, suffering, and delays. Veterinary supervision

<sup>3</sup> [Sheep lose balance, slip and fall less when loosely packed in transit where they stand close to but not touching their neighbours - ScienceDirect](#)



should be risk-based and targeted, as set out in [our dedicated position](#), which was developed jointly with the European Association of State Veterinary Officers.

| Recommendation | Amendment numbers                                    |
|----------------|--|
| Support        | 1121, 1123, 1246, 1483, 1484, 1486, 1494, 1495, 2761 |
| Reject         | 1127, 1195-1209, 1214, 1218, 1466-1480               |

#### 4. Sea Transport: strict rules are needed until its phase out in the next decade!

**Why it matters:** Time at sea — especially on **RO-RO** — **must count as journey time**. Animals experience the same welfare hazards as on the road. In the longer term, FVE advocates for the **phasing out of long-distance sea transport of animals to third countries for slaughter**. Until this is achieved, **stricter and more reliable rules** must be implemented and effectively enforced to safeguard animal welfare throughout the journey.

**Livestock vessels**, which have repeatedly demonstrated serious shortcomings and have been involved in multiple incidents, must:

- Be inspected before and during loading by a multidisciplinary team, including trained veterinarians,
- Be accompanied by an animal welfare officer directly in charge of the welfare of transported animals by livestock vessel for the duration of the journey at sea. Ideally, this animal welfare officer should be a veterinarian. They must be under the supervision of and formally report back to the transport operator’s dedicated central animal welfare officer, ideally a veterinarian, who directly reports to the operator in order to allow to take managerial decisions.
- Be properly equipped for watering, feeding, emergency care, humane stunning and killing methods, and carcass disposal,
- Take weather forecasts into account and be fitted with CCTV as well as continuous temperature and humidity monitoring.

| Recommendation | Amendment numbers   |
|----------------|---|
| Support        | 170,172, 177, 178 , 182, 292, 656, 921, 970-971, 1315, 1317, 1323, 1327 - 1328, 1332, 1336-1337, 1339, 1341, 1725–1728, 1730, 1732, 1790, 1791, 1797, 1798–652, 1814, 1815, 1846, 2164-2168, 2177, 2178, 2180–2189, 2535-2541, 2725, 2748-2752, 2762-2764 |
| Reject         | 3, 294-296, 978-979,1028-1032, 1314,1318, 1320, 1324-1325, 1784, 3100, 3101   |



## 5. Long-distance Third-Country Transport

**Why it matters:** Long-distance journeys to countries with weaker protections pose serious risks, particularly when animals are transported for slaughter. At all exit points, adequate facilities must be available to provide shelter, feed, water, and disinfection.

The ECJ has ruled that animals must be protected until their final destination – including when transported to third countries – and this obligation must be upheld.

Transport should only be permitted to countries with recognised animal welfare standards, either through compliance with WOAAH guidelines or through a formal listing system. Pre-approval of destinations would prevent situations where animals and drivers are stranded in “no-man’s land” if entry is refused. Clear provisions on how to manage and rectify such cases are essential to avoid severe animal suffering.

| Recommendation | Amendment numbers   |
|----------------|---|
| Support        | 110,111,112, 121 ,122-123, 332-336, 1122, 1123, 1953, 1955, 1957, 1961-1966, 1968- 1970, 2019, 2023, 2028,2029, 2031–2033, 2051-2053, 2056, 2163, 2462, |
| Reject         | 1816, 2020-2022, 2025, 2055   |

## 6. Animal Welfare Indicators: measuring to improve

**Why it matters: Objective welfare indicators are essential for effective monitoring and enforcement.** These indicators should be based on the extensive work done by the EU platform for animal welfare’s subgroup on policy animal welfare indicators and a relevant selection to be systematically recorded in TRACES (or an interoperable national system). By measuring animal welfare using a few well-chosen, easy-to-record indicators, authorities can pinpoint key issues, take timely corrective action, and drive continuous improvement in the conditions of transported animals. This approach ensures that welfare is not just a regulatory requirement but a measurable, accountable and continuously improving standard.

| Recommendation | Amendment numbers   |
|----------------|---|
| Support        | 1513 -1514, 1515, 1517, 1518  |
| Reject         | 345-348, 350-351, 1496, 1497, 1506, 1507, 1510, 1511, 2274–2276, 3076 |

## 7. Ensuring animals travel in thermal comfort

**Why it matters: Heat stress is one of the most serious animal welfare risks during transport.** Animals must remain within their **thermal comfort zone** to prevent both heat and cold stress. While thresholds vary by species, severe dangerous heat stress generally begins at **25°C** for most livestock, including cattle, pigs, and horses.



Given the EU’s diverse climates, transport plans must be **adapted to seasonal and local conditions**. Temperature and humidity sensors should be installed in critical positions within pens, supported by climate-control systems capable of maintaining conditions between **5°C and 25°C across all areas inside the vehicle**.

**Journey planning must account for temperature forecasts**. If extreme conditions are predicted, authorisation for the journey should be **refused** to prevent unnecessary animal suffering.

| Recommendation | Amendment numbers   |
|----------------|---|
| Support        | 304-306, 309-310, 1651, 1821-1824, 1828, 1829, 1831, 1833, 1836, 1920, 1922, 1924, 1925, 1944-1949, 2226, 2525, 2758-2759, 2889, 2897-2900, 2921, 2931-2932, 2934, 2935, 2937-2939, |
| Reject         | 1068-1077, 1804-1809, 1817, 1926-1931, 2519, 2876-2886, 2890-2895   |

## 8. Enforcement and Sanctions

**Why it matters:** Penalties must be proportionate, effective, and harmonised across the EU to deter violations and prevent calculated detours to avoid routes passing by countries with stricter enforcement and more stringent penalties and “forum shopping” by non-compliant operators. Inconsistent controls and sanctions across Member States undermine compliance and animal welfare. A mutually recognised sanctioning system, with equivalent penalties for equivalent non-compliances, coupled with stronger cross-border communication and follow-up, will improve enforcement and help ensure that serious infringements are punished consistently, protecting both animal welfare and public trust. This was identified as one of the main shortcomings in the ANIT report and the Commission initiative to alleviate this practice is very welcome.

| Recommendation | Amendment numbers                  |
|----------------|------------------------------------|
| Support        | 2196, 2205                         |
| Reject         | 2197, 2204, 2207, 2210, 2211, 2217 |

## 9. Moving Towards Carcass Trade

**Why it matters:** FVE has long maintained that animals should be transported as little as possible to minimise stress and welfare risks. Every live animal transport event inherently subjects animals to stress due to factors like separation from familiar groups and exposure to new environments, which can lead to handling stress, group stress and environmental stress. Poorly managed journeys can lead to injuries, suffering, and even death. The long-term goal should be to reduce long-distance live animal transport and increasingly replace it with the movement of carcasses and animal products, in a socio-economically viable way. Several MEP amendments, which deserve your support, have been tabled to



develop an action plan aimed at achieving this important welfare objective while ensuring economic sustainability.

| Recommendation | Amendment numbers  |
|----------------|--|
| Support        | 38, 39, 40, 44, 46, 62, 69, 87, 88, 113, 259, 260, 379, 798, 1967, 2036, 2334, 2368, 2373, 2376-2378, 2379, 2381 |
| Reject         |  |

## 10. Modernising TRACES for effective and fair animal transport oversight

**Why it matters:** A modern, reliable and user-friendly TRACES system application is essential to **strengthen oversight, safety and transparency** in animal transport across the EU. Today, veterinarians still depend heavily on emails and paper documents, leading to fragmented communication, inconsistent records and unclear responsibilities because TRACES do not yet differentiate properly between user roles. Clearer profiles, harmonised digital journey logs and structured welfare data (e.g. route deviations, fitness checks, end-of-journey outcomes) would **improve both real-time decisions and follow-up investigations**, while helping authorities coordinate across borders as many transporters operate in several Member States.

Upgrading TRACES with GPS, weather alerts, risk-based notifications and a **mobile app with offline functionality** would further reinforce welfare monitoring throughout journeys. Ensuring that all transport operators authorisations whether national or international are handled exclusively through TRACES avoids confusion linked to vague concepts such as “cross-border organisers” unless Member States use interoperable systems. **Using TRACES for national long journeys and all international transports (>9h under the new regulation)**, including for submitting, renewing and withdrawing authorisations for these journeys, improves traceability and makes repeated non-compliance easier to detect.

Some proposed amendments raise concerns. Requiring vehicle data loggers to upload temperature, humidity and ammonia data into TRACES could create inconsistencies as long as destination-country conditions are not properly accounted for, especially in third countries. Welfare infringements should continue to be reported via RASFF, not TRACES, to avoid duplication and errors. On-board cameras offer little practical welfare improvement in situations as long as drivers cannot safely intervene during the journey.

| Recommendation | Amendment numbers  |
|----------------|--|
| Support        | 97, 100-101, 619, 1017, 1039, 2001, 2126, 2151, 2353   |
| Reject         | 224, 353, 798, 800, 811, 821-822, 828, 843, 849-851, 877, 945, 962, 1097, 1139, 1165, 1408-1409, 1424, 1519, 1825-1827, 1936-1939, 2000, 2002, 2147-2148, 2196, 2525 |



## 11. Competent animal handlers make a difference

**Why it matters:** Proper training, education, and demonstrated competence are **essential to ensure animal welfare during transport**. Transport is inherently stressful, and poorly managed journeys can lead to injuries, suffering, and even death. Well-trained personnel know how to **handle animals gently, without undue use of instruments administration electric shocks, recognise signs of distress, and respond to emergencies**, while also complying with EU regulations and best practices. Investing in competence not only protects animals, **but also** reduces economic losses, enhances public trust, and supports the professional credibility of the sector.

| Recommendation | Amendment numbers                           |
|----------------|---|
| Support        | 182, 803-806, 2573, 2615                    |
| Reject         | 910-911, 2569, 2571, 2582, 2606, 2617, 2653 |

## 12. Delegated Powers

**Why it matters:** Delegated powers are essential for adapting rules to new science and technology. Removing or weakening Article 47 would freeze the regulation in outdated form.

| Recommendation | Amendment numbers  |
|----------------|--|
| Support        | 1850   |
| Reject         | 357, 359, other amendments weakening Art. 47, 1768 - 1771, 1851-1853, 3092 |

## 13. Other topics

**Scope and general provisions.** Why it matters? All animals deserve minimal protection when transported. It is also important to avoid misclassification and falsified documentation.

| Recommendation | Amendment numbers   |
|----------------|---|
| Support        | 426-427, 782, 785, 786, 871 – 874, 1363, 1366, 1367, 2568 |
| Reject         | 401, 415-417, 422, 425, 433-434                           |

**Definitions.** Why it matters? To have robust definitions of ‘long journey’, ‘transport for slaughter’, ‘breeding animals’, ‘climate-controlled transport vehicle’ and ‘vulnerable animals’, ‘journey time’

| Recommendation | Amendment numbers                                |
|----------------|--|
| Support        | 177, 178, 179, 614-616 , 652, 680, 709-718 , 969 |



| Recommendation | Amendment numbers  |
|----------------|--|
| Reject         | 510-515, 520-529, 534-555, 559-593, 1041-1047, 1050-1058 |

**One Health.** Why it matters? One Health in animal transport is important because stressed or poorly transported animals can spread diseases to humans, other animals, and the environment, linking animal welfare directly to public and ecosystem health.

| Recommendation | Amendment numbers |
|----------------|-------------------|
| Support        | 50, 496, 759, 786 |
| Reject         |                   |

### Want to read more about the veterinary position on transport?

- Veterinary supervision during loading and unloading of animals. See position <https://fve.org/publications/fve-and-easvo-call-for-risk-based-supervision-of-animal-loading-during-transport/>
- FVE position inputs for the revision of the transport regulation: <https://fve.org/publications/fve-inputs-for-the-revision-of-the-transport-regulation-10-points/>

Or contact us at [info@fve.org](mailto:info@fve.org)!