

## DRAFT CHAPTER 7.2

**ANIMAL WELFARE DURING TRANSPORT**

<b>Norway</b>	<p><b>Category:</b> General</p> <p>Norway thanks WOAHA for its work in drafting this new chapter on transport of animals that merges all the three previous chapters on the welfare of transported animals. As animals sometimes are transported by various means of transport on one and the same journey, e.g. first by lorry followed by airplane and then again lorry, it will be easier for those involved to identify all relevant rules. We can in general support the draft chapter. Yet, we do still have additional comments as indicated below.</p> <p><b>Supporting evidence:</b> not relevant</p>
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## Article 7.2.1.

**Introduction**

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*Journeys* may involve different *means of transport* from the point of origin to the point of destination. Accordingly, consideration should be given to *journey* preparation, fitness to transport, and land transport to and from the airport or seaport.

<b>Norway</b>	<p><b>Category:</b> Change</p> <p><b>Proposed amended text:</b></p> <p><b>First sentence:</b></p> <p><b>Journeys may involve different means of transport from the point of <u>departure</u> <del>origin</del> to the point of destination.</b></p> <p><b>Rationale:</b></p> <p><b>The point of origin (where the animals originate) may differ from the point of departure. Point of departure is more accurate and less likely to be misunderstood.</b></p>
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## Article 7.2.3.

**Definitions**

For the purpose of this chapter:

**JOURNEY ORGANISER**

means a person or company responsible for ensuring the planning and the necessary logistical arrangements for the entire *journey* are made in advance, including those necessary to safeguard the animals' welfare. This can be an exporter or importer, transporter, freight forwarder, owner, *animal handler*, or driver.

<b>Norway</b>	<p><b>Category:</b> Addition</p> <p><b>Proposed amended text:</b></p> <p><b>After the second sentence:</b></p> <p><b>This can be an exporter or importer, transporter, freight forwarder, owner, animal handler, or driver. <u>Entire journeys may consist of multiple steps on various means of transport which may be managed by different transporters but the same organiser.</u></b></p> <p><b>Rationale:</b></p> <p><b>Given the current definition of a journey, it is not entirely clear that an entire journey can consist of multiple journeys, e.g. first by road, then by sea. We have therefore suggested the above addition. However, another solution would be to have a clearer definition of journey and/or entire journey.</b></p>
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Article 7.2.4.

### Hazards to animal welfare

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- a) selection and transport of unfit or compromised animals;
- b) exposure to a novel environment;
- c) mixing of unfamiliar and different categories of animals;
- d) inappropriate animal handling or restraint;
- e) inadequate provision of feed and water;
- f) inappropriate design or maintenance of facilities or *means of transport*;
- g) inappropriate *space allowance*;
- h) poor driving or piloting;
- i) exposure to unfavourable microclimatic and environmental conditions;

<b>Norway</b>	<p><b>Category:</b> Addition</p> <p><b>Proposed amended text:</b></p> <p><b>Letter i):</b></p> <p><b>i) exposure to unfavourable microclimatic and environmental conditions <u>such as temperature, humidity, gas, etc.</u></b></p> <p><b>Rationale:</b></p> <p><b>It would be good to exemplify some of the conditions that have the potential to adversely impact animal welfare. The examples given are also highlighted in article 7.2.16.</b></p>
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**Responsibilities of persons involved in the journey**

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1. Competent Authorities

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2. Journey organisers

The *Journey* organisers, as defined in this chapter, should be responsible for scheduling and further logistical aspects of the *journey*.

<b>Norway</b>	<p><b>Category:</b> Addition</p> <p><b>Proposed amended text:</b></p> <p><b>The Journey organisers, as defined in this chapter, should be responsible for scheduling and further logistical aspects of the <u>entire</u> journey.</b></p> <p><b>Rationale:</b></p> <p><b>It would be good to emphasize that the responsibility covers all stages of the journey, in line with the definition of journey organiser.</b></p>
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Their other responsibilities may include:

- a) ensuring that all other persons involved in the *journey* are clearly aware of the whole *journey*, and are each assigned to their respective responsibilities in advance so that it is clear who is responsible for the tasks listed in this article, throughout the entire *journey*;

<b>Norway</b>	<p><b>Category:</b> Addition</p> <p><b>Proposed amended text:</b></p> <p><b>a) ensuring that all other persons involved in the journey are clearly aware of the whole journey, and are each assigned to their respective responsibilities in advance so that it is clear who is responsible for the tasks listed in this article, throughout the entire journey. <u>This includes also sufficient coordination between different parts of the journey or different operators to ensure that the welfare of the animals is not compromised</u>;</b></p> <p><b>Rationale:</b></p> <p><b>Because an entire journey may consist of several shorter journeys, it is essential that the organiser ensures effective coordination between all parts of the journey and all operators involved in the transport. There must be a single organiser responsible for coordinating the entire journey to reduce the risk of delays and other animal welfare problems caused by poor coordination between the shorter journeys.</b></p>
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**Planning the journey**

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Planning should ensure the following in advance of the *journey*:

- a) selection of appropriate *means of transport* to the species and categories of animals;

<b>Norway</b>	<p><b>Category:</b> Addition</p> <p><b>Proposed amended text:</b></p> <p><b>Letter a):</b></p> <p><b>selection of appropriate means of transport to the species and categories of animals, <u>including their size and weight</u>;</b></p> <p><b>Rationale:</b></p> <p><b>The species and category alone would not be sufficient to decide how many animals it would be advisable to transport, as e.g. bulls may vary in size and weight. It is necessary to know their size and weight also to be able to decide how much space is needed. The weight of the animal is also relevant for lorries to ensure that the vehicle is not overloaded for vehicle/road security reasons.</b></p>
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Article 7.2.11.

**Journey duration and requirements for water, feed and rest**

For longer *journeys*, rest stops may alleviate travel-related stress.

<b>Norway</b>	<p><b>Category:</b> Change</p> <p><b>Proposed amended text:</b></p> <p><b>For longer journeys, rest stops <u>may be necessary to</u> alleviate travel-related stress.</b></p> <p><b>Rationale:</b></p> <p><b>Not only may rest stops alleviate stress, but they are necessary for all longer journeys.</b></p> <p><b>Supporting evidence</b></p> <p><b>E.g. EFSA opinion adopted 1 June 2022 Welfare of small ruminants during transport</b></p> <p><b>For small ruminants, 11 welfare consequences were selected. One of these is motion stress. From the report:</b></p> <p><b>Page 62: “<i>Summary – motion stress and sensory overstimulation: As soon as a vehicle starts moving, and during all time when it is moving, all sheep are to some extent exposed to motion stress and often also, at least periodically (repeated intermittent), to sensory overstimulation. As a consequence of the vehicle motion, animals experience stress potentially leading to fatigue and negative affective states such as fear and distress due to the forces exerted as</i></b></p>
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	<p><i>a result of acceleration, braking, stopping, cornering, gear changing, vibrations and uneven road surface. Motion stress is regarded as a highly relevant WC in the transit stage. The prevalence is high, as motion stress is likely to affect all animals in a moving vehicle. The duration of the WC depends on journey duration and onset of vehicle motion. Motion stress will vary over time depending on the journey conditions, but the severity of its effects will most likely increase over time and may eventually lead to fatigue. Because of the constant presence of motion stress, it is not possible to estimate a temporal cut-off for onset of this WC after initiation of the transit stage.</i></p> <p><b>Page 4:</b> <i>“Per definition, breaks in journeys (either while a vehicle is stationary or when animals are unloaded in a control post, for example), function to remove the animals from the hazards they are exposed to during transit and allow them to recover from the associated welfare consequences.”</i></p>
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- 1) Animal welfare concerns
- 2) Animal-based measures
- 3) Recommendations

...

*Journey* duration should be estimated carefully and should include regular scheduled rest stops or breaks stops, as well as any transfer from the *means of transport*. Depending on the *journey* duration, animals should be unloaded, rested, fed and watered in appropriate facilities. Such rest stops should allow for checking the fitness for transport of the animals, checking and cleaning the *means of transport*, and supplying the animals with sufficient feed and water until the next stage of the *journey*.

<b>Norway</b>	<p><b>Category: Change</b></p> <p><b>Proposed amended text:</b></p> <p><b>Final sentence</b></p> <p><b>Such rest stops should allow for checking the fitness for transport of the animals, checking and cleaning the means of transport, and supplying the animals with sufficient <u>rest</u>, feed and water until the next stage of the journey.</b></p> <p><b>Rationale:</b></p> <p><b>One of the reasons for such stops is to allow the animals to recover from the previous lap of the journey, so that they will be able to cope with the next stage of the journey. It is of equal importance to allow for a sufficient period of rest as to allow the animals to feed and drink water.</b></p> <p><b>Supporting evidence</b></p> <p><b>See previous comment</b></p>
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### Fitness for transport

Correct assessment of the fitness for transport of animals before departure is essential to ensuring their welfare during *transport*. Animals that are not fit for transport should not be loaded.

<b>Norway</b>	<p><b>Category: Editorial</b></p> <p><b>Proposed amended text:</b></p> <p><del>Correct</del> <u>Careful</u> assessment of the fitness for transport of animals before departure is essential to <del>ensuring</del> <u>ensure</u> their welfare during transport. Animals that are not fit for transport should not be loaded.</p> <p><b>Rationale:</b></p> <p><b>Linguistic</b></p>
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1) Animal Welfare Concerns

2) Animal-Based Measures

Indicators that could be used to assess the fitness for transport of animals before *loading* and during the *journey* may include:

a) severe injuries and lameness;

<b>Norway</b>	<p><b>Category: change</b></p> <p><b>Proposed amended text:</b></p> <p>a) <del>severe</del> <u>moderate</u> injuries and lameness;</p> <p><b>Rationale:</b></p> <p><b>Animals with moderate lameness will generally not handle transport well and tend to become lamer when transported. Sometimes it may be permissible to transport animals that are visibly lame, but extra precautions may then be necessary such as providing them with a separate space. In general, animals that are lame at the start of the journey are likely to become lamer as the journey progresses.</b></p> <p><b>Supporting evidence</b></p> <p><b>EFSA Scientific opinion Welfare of small ruminants during transport, adopted 1 June 2022</b></p> <p><b>Page 28: “When a sheep appears lame or is reluctant to walk, pain is most likely involved. Prolonged standing and challenges to stability when the vehicle or other animals shift position are likely to cause the condition of a lame animal to deteriorate during a journey. A lame animal that lies down during transport is at risk of being injured or trampled by other sheep that remain standing. To be fit for transport, a sheep must be able to stand, bear weight on all legs and be able to adjust footing to maintain balance during the journey. The sheep must also be able to walk up and down ramps when loaded and unloaded.”</b></p>
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	<p><b>A similar statement is made on page 30 of the EFSA Scientific opinion Welfare of pigs during transport adopted on 30 June 2022. In our opinion this is the case for the other animal species that are transported.</b></p> <p><b>EFSA Scientific opinion Welfare of domestic birds and rabbits transported in containers, adopted 30 June 2022, page 26: “<i>The welfare consequences of transporting moderately lame birds, most of which are likely to be experiencing pain, have not been formally examined but it is probable that handling and motion stressors would increase levels of pain.</i>”</b></p>
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Article 7.2.14.

## Handling

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- 1) Animal welfare concerns
- 2) Animal-based and other measures

Animal-based measures that may be used to assess welfare during handling include:

- a) animals baulking, running, slipping or falling;
- b) frequency of aggressive behaviour towards *animal handlers* (e.g. rearing, kicking, or biting);
- c) frequency of avoidance behaviour, including refusal to move forward or moving away from the *animal*
- d) mounting, piling, or overlaying of animals;
- e) vocalisation indicative of *distress*;
- f) signs of respiratory distress;
- g) bruised carcasses and compromised meat quality parameters;

<b>Norway</b>	<p><b>Category: deletion</b></p> <p><b>Proposed amended text:</b></p> <p>g) <del>bruised carcasses and compromised meat quality parameters;</del></p> <p><b>Rationale:</b></p> <p><b>Only after the animal has been slaughtered will the suggested parameter be of use. This may of course be valuable when performing retrospective checks. During transport, when handling animals for loading or unloading, or evaluating them at rest stops, the handler will only be able to assess visible bruising. However, such bruising is not necessarily easy to see during transport. We therefore suggest deleting this animal-based measure.</b></p>
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- 3) Recommendations

- a) *Animal handlers* should be properly trained in non-coercive methods and tools to move animals. T...
- b) *Animal handlers* should not stand between an animal and where they want to move to, as this ...
- c) Animals should be handled calmly, as they are more easily led or driven than if they are excited, ...

- d) Mechanical handling aids should be used so as to encourage and direct movement of the animals ...
- e) Electric goads should not be used or should be used only as a last resort to move animals provided ...
- f) The use of well-trained dogs and leader sheep to help with the movement of cattle and sheep ...
- g) Animals should not be forced to move faster than their normal walking pace to minimise injury ...
- h) Animals should not be grasped, lifted or restrained in a manner that causes *pain*, suffering and injury (e.g. bruising, fractures, dislocations).

<b>Norway</b>	<p><b>Category: addition</b></p> <p><b>Proposed amended text:</b></p> <p><b>h) Animals should not be grasped, <u>dragged</u>, lifted or restrained in a manner that causes pain, suffering and injury (e.g. bruising, fractures, dislocations).</b></p> <p><b>Rationale:</b></p> <p><b>At the end of a journey some animals may be unable to get up or walk off the vehicle by themselves. Such animals should not be dragged off the means of transport. They should in most cases be euthanised or stunned before being removed, as any movement is likely to cause them further suffering. We believe this should be highlighted in the recommendation, as it may be a seemingly practical way to handle the situation.</b></p>
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4) Species-specific recommendations

- a) Horses, Dromedary and Bactrian camels [Le Meur et al. 2024] should be previously trained for ...
- b) Sheep should never be lifted by the wool.
- c) Sheep, llamas, alpacas, guanacos, and vicuña should be moved in a manner that is in keeping ...
- d) Pigs should be moved calmly, using boards or paddles, maintaining appropriate group sizes, ...
- e) Birds should not be picked up by their head, neck, one wing, or tail feathers. Catching should be carried out by skilled *animal handlers*, and every attempt should be made to minimise stress and fear reactions and injury. Birds should be in an upright position after being placed in the *container*, and the *container* should be handled, moved, and securely positioned on vehicles in a manner that minimises injuries and stress to the birds.

<b>Norway</b>	<p><b>Category: addition</b></p> <p><b>Proposed amended text:</b></p> <p><b>Inserted after the first sentence</b></p> <p><b>e) Birds should not be picked up by their head, neck, one wing, or tail feathers. <u>Certain species should not be picked up solely by their legs and may need additional support on other body parts. Whereas some species such as ducks should never be picked up by their legs.</u></b></p> <p><b>Rationale:</b></p> <p><b>Heavy birds such as turkey cannot be lifted solely by their legs. Ducks have very fragile legs and are prone to suffer a hip dislocation if lifted by the legs. They should therefore not be picked up by their legs.</b></p>
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	<p><b>Supporting evidence</b></p> <p><b>EFSA Scientific opinion Welfare of domestic birds and rabbits transported in containers, adopted 30 June 2022. On page 34 of the report the common way of handling ducks is described as follows:</b></p> <p><i>“Ducks are caught and carried by one wing and carried one bird per hand, or by the bases of both wings but may also be driven towards the containers.”</i> In Norway ducks are herded into the containers, i.e. they walk themselves.</p> <p><b>Humane Slaughter Association’s recommendation for handling of ducks:</b> <a href="https://www.hsa.org.uk/catching-and-handling/ducks">https://www.hsa.org.uk/catching-and-handling/ducks</a> and for turkeys: <a href="https://www.hsa.org.uk/catching-and-handling/turkeys">https://www.hsa.org.uk/catching-and-handling/turkeys</a></p>
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Article 7.2.15.

### Loading and unloading

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- 1) Animal welfare concerns
- 2) Animal-based and other measures

Animal-based measures that may be used to assess welfare during loading and unloading include:

- a) baulking, mounting, piling, or overlaying of animals;
- b) vocalisations indicative of *distress*;
- c) signs of respiratory distress;
- d) bruised carcasses and compromised meat quality parameters;

<b>Norway</b>	<p><b>Category: change</b></p> <p><b>Proposed amended text:</b></p> <p>d) <del>bruised carcasses and compromised meat quality parameters;</del></p> <p><b>Rationale:</b></p> <p><b>Only after the animal has been slaughtered will the suggested parameter be of use. This may of course be valuable when performing retrospective checks. During transport, when handling animals for loading or unloading, or evaluating them at rest stops, the handler will only be able to assess visible bruising. However, such bruising is not necessarily easy to see during transport. We therefore suggest deleting this animal based measure.</b></p>
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**Space allowance**

...

- 1) Animal welfare concerns
- 2) Animal-based and other measures
- 3) Recommendations
  - a) Space allowance should be determined based on multiple factors including facility design, ventilation, ...
  - b) The number of animals that can be transported on a *means of transport* or in a *container* should be ...
  - c) Animals should be transported with enough space to maintain balance and maintain their preferred position, including being able to lie down or stand up, and they should be able to adjust their body position to protect themselves from other forms of harm.

<b>Norway</b>	<p><b>Category: addition + editorial</b></p> <p><b>Proposed amended text to add after the final sentence:</b></p> <p><u><a href="#">In general, longer journeys require a higher allocation of space per animal than short journeys.</a></u></p> <p><b>Rationale:</b></p> <p><b>This sentence has been moved from letter j) as it seems more appropriate to mention this fact at the beginning of the recommendations rather than in the final bullet point.</b></p>
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- d) Adequate space should be allowed for animals to access drinkers and feeders.
- e) Adequate overhead height should be provided so that each animal can be able to assume its natural ...
- f) When animals lie down, they should all be able to adopt a normal lying posture, without being on top of
- g) Minimum space allowances should be based on current scientific evidence and appropriate regional,
- h) Space allowances should be adjusted in both hot and cold conditions. Depending on vehicle design, t...
- i) Fixtures and fittings within the *means of transport* or *containers* should be taken into account ...
- j) Space allowance should be adjusted for vulnerable animals, (e.g. cull dairy cows, fully-feathered poultry, end-of-lay hens, and animals with physiological conditions such as advanced pregnancy, recent parturition, or illnesses or injuries that do not render them unfit for transport). In general, longer *journeys* require a higher allocation of space per animal than short *journeys*.

<b>Norway</b>	<p><b>Category: deletion + editorial</b></p> <p><b>Proposed amended text:</b></p> <p><b>j) Space allowance should be adjusted for vulnerable animals, (e.g. cull dairy cows, fully-feathered poultry, end-of-lay hens, and animals with physiological conditions such as advanced pregnancy, recent parturition, or illnesses or injuries that do not render them unfit for transport). <del>In general, longer journeys require a higher allocation of space per animal than short journeys.</del></b></p>
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	<p><b>Rationale:</b></p> <p><b>This sentence has been deleted here and moved to letter c) as it seems more appropriate to mention this fact at the beginning of the recommendations rather than in this final bullet point.</b></p>
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Article 7.2.18.

### Condition of the means of transport

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- 1) Animal welfare concerns
- 2) Animal-based measures
- 3) Recommendations

The design of the *means of transport* should be appropriate for the species, size, category and weight of the animals to be transported and should be designed, constructed, maintained and used in such a way to:

- a) avoid injury and suffering of the animals;
- b) ensure the safety of animals, prevent animals escaping ,...;
- c) provide protection from adverse weather conditions;
- d) provide sufficient lighting to allow inspection ...;
- e) provide access to the animals for inspection and cared for during the *journey*;
- f) ensure good mechanical and structural condition;
- g) avoid injury to drivers and *animal handlers* while carrying out their responsibilities.
- h) vehicles should be designed so that the faeces or urine from animals on upper levels do not soil animals on lower levels, nor their feed and water. This condition is not applicable for poultry.

<b>Norway</b>	<p><b>Category: addition</b></p> <p><b>Proposed amended text to final sentence:</b></p> <p><b>This condition is not applicable for poultry, <u>but the crates should be designed to minimise the soiling of birds in other crates with faeces or urine.</u></b></p> <p><b>Rationale:</b></p> <p><b>Soiling of feathers with faeces or urine is equally uncomfortable or painful for birds and efforts should be made to minimise it occurring. Minimising the soiling should be possible as it is mentioned in the European poultry transport guide, issued by Association of Poultry Producers and Poultry Trade in the EU in 2016. Page 20 “<i>The floor should be easy to clean but should prevent birds from harming themselves during transport, therefore any leakage should be minimised.</i>”</b></p>
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- 4) Species-specific recommendations or means of transport-specific recommendations

*Species* -specific

Ruminants, pigs and equidae:

- On vehicles with lifting platforms and upper floors, these structures should have safety barriers to prevent animals from falling or escaping while being loaded or unloaded.

<b>Norway</b>	<b>Category: addition</b> <b>Proposed amended text to add after final sentence:</b> <ul style="list-style-type: none"><li>- <b>On vehicles with lifting platforms and upper floors, these structures should have safety barriers to prevent animals from falling or escaping while being loaded or unloaded. <u>The lifting platform and structures should be designed and operated to minimise the risk of animals being trapped.</u></b></li></ul> <b>Rationale:</b> <b>The design and operation of all types of equipment are equally important in avoiding situations that impact adversely the welfare of animals.</b>
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- ...

*Transport-specific recommendations*

Containers

- ...

- *Containers* should be secured so as to prevent displacement due to the movement of the *means of transport*.

<b>Norway</b>	<b>Category: addition</b> <b>Proposed amended text to add after final sentence:</b> <b><u>The containers should also be placed in such a manner that they will be properly ventilated so as to ensure the animals a sufficient supply of oxygen.</u></b> <b>Rationale:</b> <b>Ensuring animals a sufficient supply of oxygen is crucial for their wellbeing. If the oxygen supply is inadequate the animals may be dead on arrival.</b>
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Article 7.2.21.

### **Actions in the event of a refusal to allow the completion of the journey on an international transport journey**

The welfare of the animals should be the first consideration in the event of a refusal to import.

When animals have been refused import for reasons other than sanitary, the *Veterinary Authority* of the importing country should communicate officially without delay the reasons for their refusal to the *Veterinary Authority* of the exporting country and transit countries. The *Veterinary Authority* of the importing country should make available suitable isolation facilities to allow the *unloading* of animals from a *means of transport* and their secure holding under official control and considering their welfare, pending resolution of the situation.

<b>Norway</b>	<b>Category: deletion</b>
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	<p><b>Proposed amended text:</b></p> <p><b>When animals have been refused import <del>for reasons other than sanitary</del>, the Veterinary Authority of the importing country should communicate officially without delay the reasons for their refusal to the Veterinary Authority of the exporting country and transit countries.</b></p> <p><b>Rationale:</b></p> <p><b>The welfare of the animals will be impacted irrespective of the reason for the refusal to import them. Even when there are sanitary reasons for the refusal, communication should be made so that work can be begun in finding a solution that also considers the welfare of the animals.</b></p>
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