**Commission proposition on Regulation on the protection of animals during transport and related operations**

**The position of:  The Central Union of Agricultural Producers and Forest Owners (MTK), The Central Union of Swedish-speaking Farmers and Forest Owners (SLC), Finnish Food and Drink industries’ Federation (ETL) and Finnish Transport and Logistics (SKAL).**

**Summary:**

*The proposed EU animal transport regulation update aims to improve animal welfare, but Finland's geographic and climatic conditions make certain provisions problematic. Finnish stakeholders support the regulation’s goals but raise concerns over rigid limits that may hinder local food production without benefiting animal welfare.*

*We fully support an EU-wide update of animal welfare legislation and urge the EU to finalize the entire welfare package swiftly and ensure uniform enforcement across all Member States to protect animals throughout Europe. The legislation should encourage food production to sustain Europe’s food security and regional equality, including in its northernmost areas.*

**Key Concerns and Recommendations**:

1. **Transport Duration**

A nine-hour transport limit, including loading time, would be impractical for Finland. We recommend allowing EU Member States to designate remote areas where certain departure points can have permanent long-journey authorization to reduce administrative burdens. Excluding loading time from the limit would prevent stress from rushed loading. Additionally, allowing extended travel time for collecting animals from multiple farms would improve efficiency and environmental impact.

1. **Space Requirements**

The proposed increase in space requirements poses challenges in Finland without necessarily improving welfare. For cattle, a higher ceiling would end double decker transport that already ensure proper ventilation and climate control. Replacing transport vehicles across the EU would be costly and could double the number of trips, thereby increasing costs and climate impact. For poultry, extra space may reduce welfare by increasing transport damage risk and removing support, with birds potentially injuring each other. In Finland, controlled transport conditions and advanced technology already ensure animal welfare and adapting to extreme weather.

1. **Temperature Restrictions**

The proposed 9-hour driving limit at temperatures below -5°C fails to account for northern climates. No scientific evidence supports -5°C as detrimental to animal welfare, and cold is generally less harmful than extreme heat. In northern countries, cattle are commonly kept in uninsulated free stalls. We suggest removing freezing temperature restrictions altogether if transport equipment is sufficient. Using high-quality equipment, trained transporters, and controls like heating, adequate bedding, and draft prevention ensure that animals can safely be transported at low external temperatures.

1. **Calf Transport Age Limits**

The restriction on the age and weight of calves is unreasonably strict and must be relaxed. Five-week and 50 kg restrictions are proposed would cause significant challenges for Finnish milk and cattle chain. Currently, calves go to the calf rearing houses between the ages of 10 days and 5 weeks. The proposed restriction does not fit the Finnish calf-rearing units and does not promote the well-being of calves. Finland's milk production would suffer disproportionately without clear animal welfare benefits. Beef production in Finland is based on sustainable, grass-fed milk cattle. Calves are regarded as valuable animals. Our farmers have specialized expertise in both dairy and calf rearing respectively. Rearing of calves considerably longer in dairy farms would require massive investments.

1. **Poultry Transport Times**

Parent and grandparent chicks are imported. Day-old chicks arrive by land transport, with nutrients provided through yolk sacs and supplemented with nutrient gel for longer trips. We propose maintaining the current 72-hour limit after hatching, along with enhanced transport vehicle features and nutrient gel requirements. Air cargo increases handling and disease risk, making it less viable than road transport. Given Finland’s remote location, the proposed 24- or 48-hour limit would end poultry production in Finland.

1. **Veterinarian Presence**

Demand for a presence of veterinarian for each loading is unnecessary and impractical, especially given the EU-wide shortage of production animal veterinarians. A better approach would be to integrate animal loading checks into existing official controls, allowing authorities to conduct spot-checks based on risk assessments.

More information:

**Kristiina Sarjokari,** Senior advisor veterinary Specialist, (MTK), [kristiina.sarjokari@mtk.fi](mailto:kristiina.sarjokari@mtk.fi)

**Jonas Laxåback,** Secretary General, (SLC), [jonas.lasåback@slc.fi](mailto:jonas.lasåback@slc.fi)

**Riitta Rahkila**, Senior Regulatory Affairs Manager, Finnish Food and Drink industries’ Federation (ETL), [riitta.rahkila@etl.fi](mailto:riitta.rahkila@etl.fi)

**Sampsa Wichmann**, CEO,Finnish Transport and Logistics (SKAL), [sampsa.wichmann@skal.fi](mailto:sampsa.wichmann@skal.fi)