

Dear Dr. Gavinelli,

I am referring to you concerning the space requirements above the animals during transport in road vehicles.

Regulation (EC) 1/2005 requires in its Annex I, Chapter II, point 1.2:

1.2. Sufficient space shall be provided inside the animals' compartment and at each of its levels to ensure that there is adequate ventilation above the animals when they are in a naturally standing position, without on any account hindering their natural movement.

In my opinion this provision means that there must **not only** be sufficient space above the backs of the animals, but there must be sufficient space above the animals' heads, when they are standing and keeping their heads in a normal natural position. In other words, the highest point of the animals must not be in contact with the ceiling of the deck, but there must be a sufficient space between the highest point of the animals and the ceiling to guarantee adequate ventilation.

I kindly ask you to let me know, if you consider my viewpoint to be correct.

With best regards,

Sophie Greger
Animals' Angels

P.S.

The SCAHAW report from 2002 confirms this view and even gives recommendations for the space above the animals' heads. I'm copying extracts from the report below:

Sheep (page 49):

The height of compartments for sheep will cause them problems if they are unable to stand in a comfortable position. This position involves the head being held up so that the top of the head is the highest point on the animal. Since the space above the back of a sheep is not great if the roof is at head height, high temperature and humidity resulting from poor ventilation can cause severe problems for sheep. The space above the top of the head should therefore be 15 cm for vehicles with good forced ventilation systems and at least 30 cm for vehicles without forced ventilation.

Sheep and pigs (page 98):

28. The height of the compartment for pigs and sheep should be 15 cm above the highest point on the animal in vehicles with efficient forced draft ventilation and 30 cm above the highest point on the animal in vehicles with natural ventilation. For young pigs and for sheep, the highest point on the animal is the top of the head when it is held in a comfortable position. For older pigs, the highest point is the middle of the back. The highest point on a 100 kg slaughter pig might be 0.77 m so the

Cattle (page 99):

30. The height of the compartment for cattle should be at least 20 cm above the top of the head of each animal when it is standing in a comfortable position. This figure applies for all vehicles.



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