



Animals' Angels e.V. · Rossertstraße 8 · D-60323 Frankfurt

Commission of the European Communities
Attn: Secretary-General
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Christine Hafner

Request for formal opinion
Protection of animals during transport - Regulation (EC) No 1/2005
Ventilation system – maximum temperatures

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Dear Sir,

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Regulation (EC) No 1/2005 on the protection of animals during transport requires in its Annex I, Chapter VI, point 3 that means of transport by road used for journeys exceeding 8 hours transporting equidae, cattle, sheep, goats or pigs must be equipped with a ventilation system.

More specifically the Regulation requires that these
“ventilation systems (...) shall be designed, constructed and maintained in such a way that, at any time during the journey,(...) they are capable of maintaining a range of temperatures from 5°C to 30°C within the means of transport, for all animals, with a +/- 5°C tolerance, depending on the outside temperature.”

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In practice the ventilation systems of the vehicles used to transport animals of the species mentioned above consist almost always of fans (except for some extremely rare exceptions of vehicles equipped with an air conditioning system). These fans merely ventilate the air, they are, however, not capable of lowering temperature. In consequence during hot weather the temperature inside the animals' compartment cannot be lower than the external temperature, but usually be even higher.

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Accordingly, in our view, transporting animals on journeys exceeding 8 hours is, in case temperatures rise above 35°C during the journey, to be considered a violation of Regulation (EC) No 1/2005. Therefore, if during a road check the inspection authorities ascertain temperatures over 35°C (measured within the animals' compartment or even more in any case where the external temperature is above 35°C), sanctions need to be imposed and emergency measures taken according to Art. 23 of Regulation (EC) No 1/2005.

Animals' Angels kindly asks to be informed if the Commission Services share this view.

With best regards,

Christine Hafner