

10/03/2025

### **Proposed Regulation 2023/0448 on the protection of animals in transport**

In the interest of horses' well-being, and their welfare before and after their transport purposes: training, racing, equestrian sport and leisure activities, breeding activities and auction events, We, the EMHF – European and Mediterranean Horseracing Federation, the EEF – European Equestrian Federation, the EFTBA – European Federation of Thoroughbred Breeders Associations, and the UET European Trotting Union.

- a. welcome the derogation proposed by the European Commission for the equestrian sport and leisure activities within the article 2 paragraph 2
- b. ask you to support an amendment to the proposed legislation, which would continue to allow the transport of race and sports horses for breeding and registered auction sales purposes

The present 1/2005 Regulation contains specific derogations for these equidae. However, in changing the current criteria from 'registered horse' to a list based on purpose of travel, the breeding and sales sector has been omitted. While this may seem a tiny and inconsequential oversight in such wide-ranging legislation, it would have a devastating impact on the sector and negative welfare consequences for this sub-group of horses. These breeding and sales stock travel in exactly the same vehicles and welfare conditions as horses travelling for racing and equestrian competitions.

Therefore, we ask you to support the following amendments (changes to proposal in bold)

Article 2.2

(c) the transport of animals for the purposes of participation in training, exhibitions, competitions, **horse races**, cultural events, circuses, equestrian sport and leisure activities

**(d) equidae transported for breeding or rearing purposes, or to or from auctions organised by approved houses**

These amendments also carry the support of a broad range of organisations in the racing, equestrian and broader equine sectors. These include global organisations: International Federation of Horseracing Authorities, International Federation for Equestrian Sports, International Thoroughbred Breeders Federation, Society of International Thoroughbred Auctioneers, International Stud Book Committee, reflecting the potential global impact of the proposed legislation. Several other global, European and national organisations have also lent their support and are listed below.

Science does not support the simplistic shorthand that 'a horse is a horse'. Stress levels, death and injuries that have been reported in some unhandled and unfit horses transported mainly for slaughter are not replicated in the case of well handled, trained, fit and healthy horses travelling in superior vehicles, and are often accompanied by highly trained drivers and staff.

The equestrian sports and racing sector operates on an entirely different transport model from the farm livestock and slaughter horse sector, which is the main focus of these proposals. The obvious fact is that, unlike farm animals to slaughter, it is just not in our own self-interest and does not make economic sense for anyone in our sector to compromise health and welfare during a journey to and from auction or to and from a stud or breeding establishment. Many of the proposals, which make perfect sense for farm animals, are not only unsuitable and unworkable for the transport of our horses, they quite clearly would have negative welfare consequences.

Our amendment would ensure that our horses still have protection in this EU law (since all commercial transport of horses is covered by the significant provisions within Article 4), while at the same time providing more detailed and relevant protection for the 13% of horses transported within the European Union for slaughter. Therefore, the key here to better welfare in transport for horses is better enforcement, rather than even stricter rules, based on farm animal to slaughter requirements, which will - and we do not exaggerate here - decimate the European racing and breeding sector, and not allow its important auction sales to function.

There is significant veterinary oversight and health and welfare regulations and requirements for these horses within the sports and racehorse sector for breeding and auction horses.

The European sports and horse racing breeding and sales sector is a world leader. The proposal as it stands would bring it to a halt, by making international sales at auction houses impossible, and severely limiting transport of breeding stock.

We attach more detailed information, including the negative welfare aspects of the current proposal, and the devastating economic impact on the sector. If the amendment to broaden Article 2 is not accepted, then there will have to be, as at present, a number of particular derogations for equine breeding stock within the body of the legislation to enable our industry to continue. We will contact you to follow up on this letter but, in the meantime, if you have any further questions, please do not hesitate to contact us.



Paull Khan, Secretary  
General, EMHF



Joe Hernon, Chairman,  
EFTBA



Theo Ploegmakers,  
President, EEF



Peter TRUZLA,  
President, UET

Other organisations supporting the amendment include: European Horserace Scientific Liaison Committee, European and African Stud Book Committee, International Federation of Icelandic Horse Associations, Filiere Cheval (FR), Belgian Confederation of the Horse, European Trainers Association, Dutch Federation of Professional Equestrian Centres, the German Equestrian Federation, Equ'Institut, Federation Internationale de Tourisme Equestre and European Breeders Fund.

Contact details for further information: [cathy@emhf.eu](mailto:cathy@emhf.eu)

**Significant issues which will arise if racing- and sports horse-breeding and sales stock are not added to the Article 2.2 derogations**

**Veterinary supervision Art 17.2 and Art 25.3**

The proposal introduces the obligation for a vet to supervise loading and unloading operations. We understand why this has been introduced to improve the welfare of often large groups of unhandled farm animals. However, auction and breeding horses are often collected individually and are used to being calmly and safely loaded and unloaded, and travelled. This proposal would have the effect of lengthening journey times, be costly, disproportionate and completely superfluous for our whole sector. Many of our sector's journeys take place outside normal business working hours when it is unlikely that official veterinarians would be available.

Moreover, this requirement tends to be unrealistic when overloading veterinary services who already find themselves under-staffed on the ground, especially as the operation of loading, transport and unloading of all the equines above-mentioned (racing, sport, etc) are done by registered and certified people.

'If animals have experience of loading and of transport in which conditions are good, they are likely to show much reduced responses to subsequent loading and transport' / "Horses which are frequently transported and sheep which have been transported on several occasions show fewer indications of poor welfare' (EU Scientific Committee on Animal Health and Welfare 2002)

**Proposal = negative welfare benefit - no sound scientific basis – disproportionate negative economic consequences**

**Temperatures - Article 31**

The Commission's decision to base its rules solely on external temperatures is concerning for the sector. **These proposals are not based on solid scientific foundations** and do not take into account essential parameters, namely: **Ratio of temperature/humidity - Presence of a ventilation system and circulation of air - Difference in temperatures throughout the Union, and equine accustomisation.**

Unlike the current Regulation, there is no distinction between long and short journeys, and the proposals are not species specific. Horses have a much wider range of thermal tolerance than many other farmed species, and in addition, there are common practices, such as using blankets in cold conditions, which mitigate any welfare risks. Therefore, this proposal is not based on scientific evidence or industry practices, and is clearly disproportionate.

While we welcome the current Polish Presidency proposal to change this to internal temperature readings, many horses still travel comfortably, particularly in sub-zero temperatures, and therefore the proposed changes need to clarify that this is while the vehicle has started the journey and not during loading.

In addition, the requirement remaining for an extra 20% space in higher temperatures, is focused on farm animals travelling in a group, rather than horse transport as our vehicles have adjustable internal divisions which can be adapted to the needs of the individual.

'Horses have a wide thermal tolerance (-10 to 30 °C) particularly tolerating cold well'. Marlin (1996)

**Proposal = no welfare benefit - no sound scientific basis – disproportionate negative economic consequences**

## Space allowances Article 31 (e) and Annexe 1, Chapter 7

Article 31(e) places an obligation on transporters to increase space allowances by 20% when temperatures are over 30 °C. **Unlike other species, horses are transported in individual stalls which can be adapted to meet the needs of the individual.**

Likewise, the design of stalls to standard dimensions **makes it impossible to adapt vehicles to the individual physical characteristics of each Equid, stipulated in Chapter 7 of Annexe I.**

Moreover, certain horses need the help of the stall sides to keep their balance. **An increase in space, therefore, does not equate to increased welfare and could easily result in the opposite, heightening the risk of injuries and falls in transport.** Horses should always have room to spread their legs to balance and the current requirements allow for this.

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## Journey times

Article 27 on journey times has been drafted with unhandled farm animals in mind. The requirement for a maximum of only one unloaded rest period and a journey of only two parts would be completely against the best welfare needs of racing and sports breeding and sales stock, where more than one unloaded rest period may be required on long journeys.

"There is not a linear relationship between the duration of a journey and stress or animal welfare (Faucitano and Lambooij, 2019; Padalino and Riley, 2022a,b). Moreover, the journey time, per se, is rarely the root cause of poor welfare, while transport conditions are the major factors which may lead to poor health and welfare (Nielsen et al., 2011)."

The requirement to be rested off the vehicle at a control post would be most problematic, given that there are currently not enough control posts for these horses throughout Europe. Nor are the facilities often suitable for this group of horses, their often higher health status. The consequences of mingling with other species and horses of less health status could be disastrous. This proposal would pose biosecurity hazards as well as the physical hazards inherent in repeated loadings and unloadings.

The current proposed amendments under the Polish Presidency do not solve this problem for us.

The new inclusion of journeys by air is an extremely worrying development for the equine sector, especially the thoroughbred horse sector where artificial insemination is not allowed under international rules. European thoroughbred stallions for example, are shuttled yearly between continents, with a huge benefit to both the continuing genetics of the breed and the economic standing of European horse breeding. European sports horse breeding stock are sold internationally.

Likewise, the new proposal in Article 30.2 (a) for animals to be rested at a control post off the vessel for more than 12 hours at the point of arrival or its vicinity would be impossible to implement for the sports and racing breeding sector, particularly given the seasonal nature of some sales where hundreds of breeding stock are travelling in the same period.<sup>1</sup> There are no current adequate facilities for this proposal, which would unnecessarily prolong journey times and endanger the health status of this sub population of horses. The value

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of high-value racing and sports horse international auction sale is well in excess of a billion euros a year – health and welfare is top priority for all these horses.

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### **Obligation to remain for one week at place of departure and place of destination**

Article 14, 2 (a) and Article 3.3 stipulate an obligation to keep the horse at the place of departure and arrival for at least one week before transport. This requirement is unfounded, impractical, unnecessary and counter-productive.

Many journeys for breeding (as for racing and competition purposes) are return journeys, where the return leg is made within an interval of a few days or even hours) and most outward journeys to auction sales are followed within a very short time by a journey to the horse's new home, or back to its previous home, if unsold.

If these legs are treated as separate journeys, the horses would be required to be kept at the interim destination for at least 7 days – which, if practicable at all, would be extremely costly and disruptive, would bring no welfare benefit and would create biohazards and potentially create welfare disbenefits.

It has been suggested that they may be treated as a single journey – but this would bring its own problems, since many such journeys would then be classified as 'long journeys', (those longer than 9 hours), meaning that the horses would then fall foul of Article 27. This, as mentioned above, restricts to one the number of stops which may be made rested off the vehicle: a completely unnecessary limitation which would never be to their welfare benefit and would often be to their welfare detriment.

Further, in the case of auction sales, the proposed legislation envisages that the organiser of the transport has all the information relating to the journey, from place of departure to place of destination, with different stages (compulsory stops, other transporters, etc...) **But it is not possible to know in advance the final destination of the horse. The place of sale is just a stop-over.** By definition, therefore, the organiser of the journey *cannot* register into TRACES in advance the information about where the horse is going after being sold.

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### **Article 33 Obligation to stay 7 days at place of arrival in 3<sup>rd</sup> countries**

Within Europe a large percentage of Irish thoroughbred horses, for example, are sold at yearly sales in Britain, now a third country.

The same is valid for equestrian events up to FEI events including the Regional Championships lasting over 3-4 days also in 3<sup>rd</sup> countries in Europe, such as Turkey and Serbia for example.

The obligation to stay a full 7 days brings no welfare benefits, and potential negative welfare benefits due to their being prevented from returning to their home stables (which are often within short distances, in neighbouring countries) and to reduced facilities for grazing and exercise at the places where they must stay. Further, the economic consequences are disproportionate.

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#### **Ban on transport for pregnant mares of 80% or more or for mares who have foaled in last 7 days**

Annexe I, Chapter 1(f) stipulates that pregnant females who have passed 80% or more or who have given birth in the last 7 days are unsuitable for transport. This requirement is incompatible with equine breeding practices where mares are often moved at the latest possible date to a specialised facility to foal. This is expressly to improve their health and welfare.

Equally, mares can be taken to the stallion at their first ovulation after foaling between 5 to 13 days after foaling.

The equine stud and AI centre are structures which simply do not exist in the general farming model, and this further demonstrates why equines for sports and racing breeding do not fit into these generalised farm animal welfare requirements.

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#### **Transporter authorisation requests**

The requirement for authorisation applies to all transport over 50km. The administrative delay of this requirement is not compatible with the constraints experienced by breeders. Breeders often move their mare when she ovulates. The success of the natural service or sometimes insemination (in the case of some trotters and sports horses) therefore depends on the monitoring and reactivity of the breeder, who should not have to have these unnecessary administrative constraints, which risk missing a cycle, imposed, as they will not bring any welfare benefits to his horses.

**Proposal = no welfare benefit = no sound scientific basis– disproportionate negative economic consequences**

### **Key facts and figures on the European horse sector (horses not destined for slaughter)**

- Only 13% of horse journeys in Europe are to slaughter
- 100 billion euros a year economic impact of sector
- 500 000 direct and indirect jobs
- 6 million or more horses in Europe
- Horse auction sales over one billion euros a year

### **Examples of industry regulation and guidelines**

- International Federation of Horseracing Authorities Transport Welfare Guidelines  
[https://www.ifhaonline.org/resources/Transportation\\_Welfare\\_Guidelines.PDF](https://www.ifhaonline.org/resources/Transportation_Welfare_Guidelines.PDF)
- Welfare Guidelines for Transportation in the Thoroughbred Breeding Industry  
<https://itbf.global/welfare-guidelines/>
- FEI code of conduct for the welfare of the horse  
<https://campus.fei.org/course/info.php?id=457#:~:text=The%20FEI%20Code%20of%20Conduct%20for%20the%20Welfare,animal%20welfare%20work%20within%20the%20sport%20in%202013.>

(Educational content and additional guidelines for FEI horses transportation are currently being developed)