

Brussels, 2nd February 2015
UECBV Ref: 6144

Proposal on the Animal Health Law [\[COM \(2013\) 260\]](#) – UECBV Position

Key points

1. Movements of kept terrestrial animals and animal health certifications (Artt.121-123-124-125-126-127-140)

In the COM proposal, the concept of “single market”, which is the basis of the European community, is once again put aside. There are still differences between “domestic market” and “intracommunity market”. Paradoxically, it is easier to transport animals within the same Country, even for more than one thousand kilometres, than transport animals for 50 kilometres, if in those a national border is present.

Moreover, the COM proposal includes delegated acts, in which the COM can establish the residency period of ungulates and time for limiting the introduction of new animals into the establishments. Details like these can have a huge impact on trade flows within the EU. In particular, it needs to be clarified if the residency period rule will be applied for all ungulates and if the “quarantine” period on the primary holding will be introduced for cattle also.

- ✓ UECBV recognises that the COM made a step forward when proposing the derogation from the animal health certification requirements, which UECBV strongly supports. However, it should be the rule and not the exception and the Commission is called on for further simplification of the rules.
- ✓ This is why UECBV strongly supports the Council proposal for what regards a derogation from the animal health certificates when certain conditions are met (Article 140) and a creation of a “Schengen area” for livestock. **The derogation from the animal health certificate has been already introduced in a trilateral agreement signed by the Governments of Belgium, France and Luxembourg.**
- ✓ In view of the future Animal Welfare Law, UECBV supports the COM and the Council proposals according to which references to Animal Welfare regulations are out of the scope of the Animal Health Law.

As for general requirements for movement of kept terrestrial animals between Member States, UECBV fully supports the COM (and the European Parliament) proposal, as described in Article 123.

2. National measures for limiting the impact of diseases other than listed diseases (Art.169)

UECBV rejects any idea interfering with the internal market.

This is why Article 169 as suggested by the European Parliament is not supported; on the other hand, UECBV supports Article 169 as proposed by the COM and sustained by the Council.

3. Assembly operations (Art.130)

- ✓ There is no need to prescribe exactly where the assembly operation takes place, but it would be useful to regulate the number of assembly operations before reaching the destination.

This is why UECBV supports the suggestion to have a maximum of three assembly operations (which are independent from the location), as foreseen in the EP and Council proposal.

4. Registration of transporters (Art.86)

Article 86 gives the opportunity to Member States to exempt certain categories of transporters from the registration requirement, if some criteria are followed.

The Commission proposal of giving flexibility to each Member State to decide is welcomed. However, the **concept of biosecurity and disease prevention is a shared responsibility along the entire food chain**. Farmers, veterinarians, transporters, slaughterhouses and other input providers all play a role in ensuring good animal health in Europe, together with consumers and travellers around the world.

Small transporters could be involved, as well, in the spreading of diseases and so it would not be wise to exempt them neither from the registration nor from the record keeping requirement.

- ✓ UECBV supports the European Parliament's proposal to delete Article 86.

5. Data records (Art.101 and Art.117)

Articles 101 and 117 foresee that the Commission shall, by means of implementing acts, lay down rules concerning the format of records and the technical specifications, formats and operational rules of computer databases.

Member States have already put in place systems for tracking and tracing, adapted to their specific needs. Detailed rules from the Commission on these systems will mean changing what is already in place in a way that shall not meet all Member States' needs. Moreover, how the document looks like or what the management system should look like, as foreseen in the COM proposal, would not give any added value to the operators, but just an additional burden.

The **European Livestock and Meat Trades Union (UECBV)**, founded in 1952, is the mouthpiece of national federations representing livestock markets, livestock traders (cattle, horses, sheep, pigs), meat traders (beef, horsemeat, sheepmeat, pigmeat), and meat industry (slaughterhouses, cutting plants and meat preparation plants).

Brought together within the UECBV are:

- ✚ an international association i.e. the **European Association of Livestock Markets (AEMB)**;
- ✚ a **Young European Meat Committee (YEMCo)**;
- ✚ the **European Natural Sausage Casings Association (ENSCA)**
- ✚ the **Organisation of European Shippers (OCEAN)**
- ✚ fifty-six national or regional federations in twenty-two of the twenty-seven Member States of the European Union and also Morocco, Norway, Russia, Serbia, Switzerland, and Turkey.

In total, some 20,000 firms of all sizes and 230,000 jobs are represented within the UECBV through its national member federations.