

**The Swedish Implementation Council**  
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Landsbygds- och  
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## **Basis for Sweden's position in the ongoing EU negotiations regarding the proposal for a regulation on the protection of animals during transport, COM (2023) 770**

The Swedish Implementation Council's contribution to the Swedish position is presented in full in section 8. In summary, The Swedish Implementation Council would like to highlight the following points

- Harmonising requirements regarding travel time limits
- Nuance requirements for space during transport
- Relaxing the requirement for the presence of a veterinarian when loading and unloading
- Replace requirements for adaptation to outdoor temperature during transport
- Easing requirements for the use of TRACES in national transport
- Work for clearer demarcation in relation to the horse industry

### **1. Task of The Swedish Implementation Council**

The Swedish Implementation Council is tasked with assisting the Government in its efforts to strengthen the competitiveness of Swedish companies by avoiding implementation above the minimum level and counteracting unjustified regulatory burdens, as well as reducing administrative costs and other compliance costs in connection with the

implementation of EU regulations in Swedish law. The Swedish Implementation Council's work shall be based on a company perspective.

The Swedish Implementation Council is to submit documentation and recommendations to the Government, partly as a contribution to Swedish positions in negotiations and partly on how EU legal acts can be implemented in Swedish law in a way that is not more far-reaching from a business perspective than what the legal acts require.

## 2. Relevant proposal for an EU legal act

Proposal for a Regulation of the European Parliament and of the Council on the protection of animals during transport and related operations, amending Council Regulation (EC) No 1255/97 and repealing Council Regulation (EC) No 1/2005.<sup>1</sup>

## 3. Aim and purpose of the proposal

The proposed provisions are intended to replace previous regulation in this area in order to ensure a high level of animal welfare, simplify procedures, reduce administrative burdens and facilitate compliance with harmonised rules.

## 4. Where in the process is the proposal?

The proposal is now being considered in a working group in the Council, a progress report was submitted in November 2024. At the time of this progress report, work in the European Parliament had not yet begun, but the handling in the responsible committee should now have been initiated. The Swedish Implementation Council does not have full insight into the negotiation situation and the scope this provides, but nevertheless considers it important to highlight the views of the relevant industry organisations mediated to the Council within its initial work.

## 5. Responsible ministry

Ministry of Rural Affairs and Infrastructure

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<sup>1</sup> COM (2023) 770

## 6. Problem description from a Swedish business perspective

The proposal is expected to affect Swedish companies in the form of increased costs and difficulties in meeting requirements in an area where the national level of protection is already higher than in several other EU countries. Differences in the level of protection in relation to other EU countries, for example when it comes to limiting transport times, fragment the EU-wide regulatory framework and risk creating competitive disadvantages for Swedish companies. Requirements for the presence of a veterinarian during loading and unloading constitute another problem, as there is a shortage of veterinarians in Sweden<sup>2</sup>. The proposal also includes requirements for a larger area during transport, which can inhibit the efficiency of operations. Requirements for the use of the EU-wide positioning system, TRACES, also in national transports will be unnecessarily administratively burdensome. There is a certain ambiguity when it comes to drawing boundaries with the horse industry, which risks causing problems of application and interpretation. Horses are transported frequently and for many purposes other than slaughter. If all these transports were covered by the regulation and its requirements, it could be unnecessarily costly for the horse industry.

All Swedish companies in the animal husbandry and slaughterhouse industry that carry out transports of animals referred to in the regulation are affected by the proposed rules, regardless of the size of the companies. It is also likely that small companies will be hit harder because they may have poorer opportunities for flexibility and efficiency based on the requirements that are set.

According to the Swedish Board of Agriculture's statistics for farm animals in 2024, the current industry consists of 23,386 agricultural holdings with animals, the majority of which concern cattle, sheep and pigs. In 2023, Swedish animal production had a turnover of around SEK 20 billion. In addition, according to the TRACES database, there are 114 slaughterhouse companies in Sweden.

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<sup>2</sup> See e.g. [uppdrag-att-utreda-veterinär-beredskap.pdf](#), [Risk of increased veterinary shortage - Lantbruksnytt](#), [The shortage of veterinarians and veterinary nurses must be solved – Smålandsposten](#)

## 7. Implementation Council Analysis

The proposal could entail increased costs and competitive disadvantages for Swedish companies in the animal husbandry and slaughterhouse industry if the requirements are not balanced. Below is a review of the possible consequences of the proposed rules and an estimate of the cost of the proposed rules, as well as an assessment of the significance for Swedish competitiveness. Thereafter, a basis for the Swedish position is presented, with possible alternatives to and nuances of the proposals.

### **Consequences for Swedish companies**

The proposal may result in increased costs and thus negative consequences for Swedish companies and their competitiveness. Differences in the limitation of transport time, where Sweden currently has stricter rules, could mean competitive disadvantages for Swedish companies. The far-reaching requirement for the presence of a veterinarian during loading and unloading would mean increased costs for transport, but also that in the absence of available veterinarians it would be difficult or, in the worst case, impossible to carry out transports. The requirement to adapt transport to a certain outdoor temperature could mean that certain transports need to be delayed or cannot be done at all during certain times. The requirement for more space in transport means fewer animals per transport, which in turn either means less profitability per transport, or that costly investments must be made to achieve efficient transport, for example in the purchase of new vehicles that meet the new requirements.

### **Estimated costs**

When contacting the relevant industry associations, they have estimated the cost for **requirements for veterinary presence** as follows:

If veterinary presence were to be required, the slaughterhouse industry estimates that only transport to slaughter for four-legged animals would include at least 60,000 stops on the farm per year for all operators and animal species. If one estimates the cost to be at least SEK 5,000 per occasion when a veterinarian is to be present for about 3 hours, the cost of these 60,000 stops during transport to the slaughterhouse would amount to SEK 300 million. For poultry, the costs are estimated at at least SEK 36 million.

With regard to proposals for increased **space requirements**, the relevant industry organisations provide the following cost estimates:

When it comes to the increased space requirements, slaughterhouse ranks estimate that it will cost a total of between SEK 200 and 300 million to rebuild the facilities to be able to handle an increased transport flow of 40 percent, as increased surface requirements mean more cars must be unloaded and cleaned. In addition, there are costs for more expensive transports of between SEK 600 and 700 million for the purchase of new vehicles, increased staff density, rebuilding of existing ones, more fuel and increased personnel costs.

According to Svensk Fågel, it is estimated that for the food bird industry, the increased space requirements in the transport boxes would entail a cost of around SEK 350 million for fewer animals per transport, more transports, loading, reconstruction of facilities (area, slaughterhouse, reception). This only includes the larger food poultry slaughterhouses, which comprise about 70% of the slaughter. For the small and medium-sized slaughterhouses, there are additional costs.

Requiring **the use of TRACES** also in national transport entails administrative costs that are difficult to estimate, but is another consequence that is burdensome.

In addition, the relevant industry organizations mention that the consequences for the horse industry have been omitted from the background material and cost estimates are missing. Furthermore, the proposal has not defined what is meant by economic activities linked to horses, which can cause demarcation problems and the risk of different interpretations among member states.

### **Significance for Swedish competitiveness**

Swedish livestock production, including horse farming, is an important part of Sweden's economic development, especially since it contributes to employment and food security throughout the country, including rural areas. To strengthen the industry's competitiveness, it is crucial that new rules do not hamper development and investment, especially for smaller companies with weaker financial conditions. At present, competition is distorted to the detriment of Swedish animal keepers, as Sweden has stricter animal welfare rules than many other EU countries. It is of course positive that the EU's rules for the protection of animals during transport become stricter and better in line with the Swedish animal welfare requirements. At the same time, it is important that the common EU rules

really achieve the objective of improving animal welfare in an efficient and effective way. The Swedish Implementation Council sees several problems with the now proposed rules.

## 8. The Swedish Implementation Council's basis for Sweden's position in ongoing EU negotiations

The requirements set out in the regulation are intended to ensure a high level of animal welfare, as is already the case in Sweden. If the EU's animal welfare legislation is becoming stricter, it is important that Swedish producers are not imposed by costly requirements in addition to those that already exist. A disproportionate increase in regulations can lead to a decline in profitability and, in the long run, a reduction in domestic production. More concretely, the Council would like to highlight the following points as important in order to safeguard the interests of Swedish companies.

### ➤ **Harmonising requirements for limitation of travel time**

The proposal contains definitions of short and long transport. The limit for short transport has been set at 9 hours and a transport that exceeds that time is defined as long. 9 hours as the maximum transport time for short transport differs from the 8 hours that apply in Sweden, which thus has a higher level of protection than other EU countries. It is in the interest of companies that the same requirements apply in all EU countries in order to avoid competitive disadvantages. In addition, fragmentation due to different national requirements weakens the regulatory framework as it creates ambiguity and becomes more difficult to comply with. Therefore, the Government should work to ensure that the same restrictions on transport time, regardless of which ones are chosen, apply in Sweden as in all other EU countries.

### ➤ **Nuance requirements for space during transport**

Sweden already has requirements for space that exceed the requirements of the regulation that is now to be replaced. Requirements are now proposed, demanding a larger area compared to the Swedish ones. The new requirements would mean increased costs because it means fewer animals per transport, as more transports need to be made. A larger area is also not necessarily better for the animals because too large an area can create

problems for the animal to keep its balance. Here, The Swedish Implementation Council would like to highlight the possibility, depending on the animal species, of having different requirements for space depending on whether it is a long or short transport. The requirement for space proposed in the upcoming regulation should apply to long transports, while the already current Swedish requirement should apply to short transports.

➤ **Relaxing the requirement for the presence of a veterinarian during loading and unloading**

The requirement for the presence of a veterinarian during loading and unloading is difficult to comply with as there is a shortage of veterinarians. The demand has not been deemed reasonable either by the Swedish Veterinary Association<sup>3</sup> and has also been met with concern by the delegations in the Council negotiations.<sup>4</sup> In view of this, the Presidency has proposed an alternative wording that instead requires the presence of a person with "the necessary skills", something that The Swedish Implementation Council believes should be supported.

➤ **Replace requirements for adaptation to outdoor temperature during transport**

Setting requirements for adapting transport times and timing of transport in relation to outdoor temperature is not as appropriate as setting requirements for the climate in the cargo space. Ensuring a good climate for transport in the cargo hold itself contributes to animal welfare while also allowing for efficiency and easier planning. Sweden should therefore work to ensure that any demands instead focus on this.

➤ **Easing requirements for the use of TRACES in national transport**

It is good to make use of the positioning capability provided by TRACES, which plays an important role in cross-border transport. As it is also associated with administrative work and costs, Sweden, with its many small-

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<sup>3</sup> See consultation response, specifically on Article 25.3 [svf.remissvar.eu-förordning-djurskydd-vid-transport-slutligt.pdf](http://svf.remissvar.eu-förordning-djurskydd-vid-transport-slutligt.pdf)

<sup>4</sup> See progress report, Council of the European Union, 16056/24, [pdf](#)

scale operations and lack of veterinarians, should work for easing the requirements for the use of TRACES in national transport.

➤ **Work for clear demarcation in relation to the horse industry**

Article 2(p)(2)(c) proposes that the transport of horses is subject to the general provisions of Article 4 of the Regulation only if the transport is carried out for the purpose of participating in training, exhibitions, competitions, cultural events, circuses and equestrian and leisure activities. However, there are additional purposes for which horses can be transported, such as breeding, which are not listed among the exemptions. In order to avoid problems with application and interpretation, the Council would like to emphasise the importance of making it clear when and to what extent the rules of the proposed regulation otherwise cover transport within the horse industry. One way is to extend the proposed Article 2(p)(2)(c) so that all purposes for the transport of horses other than slaughter are covered by the Article. Another way to clarify could be that the transport of horses is regulated in a separate chapter.

**Contacts during the Council's work**

In the preparation of this documentation, we have been in contact with the Meat and Charcuterie Companies, Svensk Fågel, LRF, LRF Häst and a number of other organizations representing the horse industry.

The contact person in this case is inquiry secretary Lena Nordqvist  
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This document has been machine translated from Swedish to English.