

# EAZA Position Statement on Council Regulation 1/2005: Protection of Animals during Transport



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- EAZA members are experts in zoo animal transport and there is no evidence of welfare problems in this regard;
- Current animal transport legislation is designed with agriculture in mind and it is disproportionate to apply the same rules to zoos, which transport vastly fewer animals;
- EAZA members adhere to internationally agreed guidelines on animal transport and strongly favour a self-regulatory environment in Europe.

The European Association of Zoos and Aquaria (EAZA) represents 322 members from 36 countries, of which more than 280 are located in the European Union. EAZA collections house more than 250,000 animals, excluding fish and invertebrates, with approximately 25,000 animals exchanged between collections annually. **In this context we wish to present our position on the Council Regulation (EC) No 1/2005 of 22 December 2004, on the protection of animals during transport, in light of its current review by the European Union.**

EAZA strongly supports the protection of welfare during the transport of animals. While EAZA generally welcomes this legislation we, however, believe that Council Directive 1/2005 is largely directed at the agricultural industry and not at animals as held in zoos and aquariums. The Directive is interpreted differently by EU Member States, with a lack of consistency as to whether or not transports between zoological collections fall under its definitions and as to the applicability of the paragraphs in the Annexes. Because of this animal transports, particularly those involving two or more Member States, are often delayed or hampered. Transports of animals such as rhinos and giraffes are already complicated without the addition of unnecessary and disproportionate paperwork. EAZA believes self-regulation would represent the most efficient and effective approach to protecting the welfare of animals during transport between EAZA zoos and aquariums.

Keeping, transporting and displaying healthy animals under good welfare conditions in EAZA collections is of crucial importance to achieve our main objectives. The '*EAZA Minimum Standards for the Accommodation and Care of Animals in Zoos and Aquaria*' (revised 2008) include extensive paragraphs on animal welfare, health, hygiene, surveillance and veterinary aspects. In addition EAZA has laid down its principles for animal transports in the "*EAZA guideline on animal transport*" (2010). EAZA members are encouraged to follow the IATA Live Animal Regulations for the transport of animals by air, and the AATA Transport Guidelines for road, rail and boat transports. EAZA is currently advising the CITES Animal Transport Committee on the applicability of the IATA Live Animal Regulations for road, train and boat transportation of animals held in zoological collections and is highly likely to adopt the new CITES transport guidelines as soon as these are available.

Populations of endangered species kept in EAZA collections are often irreplaceable and some species held in EAZA institutions are extinct in the wild. Furthermore animal exchanges between EAZA member institutions (largely in the framework of EAZA's conservation breeding programmes) are imperative to ensure healthy and sustainable populations of wild animals in human care into the

future. As a rule animals exchanged in the framework of EAZA's European Endangered species Programmes (EEPs) may not be sold or be subject to any other form of financial barrier. Hence EAZA strongly opposes the classification of EAZA zoo animal transports as commercial trade or commercial movements. Breeding programmes for endangered species are jeopardised by unclear legislation, lack of uniform implementation of EU legislation by Member States and slow decision making processes that make animal exchanges difficult or even impossible. This obstruction can lead to compromised welfare conditions and obstruction of conservation initiatives.

EAZA members are *the* experts on the transport of animals as kept in zoos and aquariums and should be recognised as such. We are not aware of any studies indicating that there are welfare problems when animals held by zoos and aquariums are transported and therefore EAZA believes there is no incentive to further regulate zoo and aquarium animal transport at EU level. When compared to the 4.3 million cattle, 21.7 million pigs and 794 million poultry traded between EU member states in 2006 alone, the number of animals exchanged between EAZA members is miniscule. It is therefore not surprising that the legislative framework governing agricultural transports is not well adapted to the needs of the zoo and aquarium community.

We believe that the position of EAZA zoos and aquariums should be fully considered when designing and evaluating EU animal health and welfare regulations. In addition EAZA recommends that the European Association of Zoo and Wildlife Veterinarians should be fully consulted on veterinary matters pertaining to zoo and aquarium animals. Exchanges of animals in the framework of recognised EAZA breeding programmes should be simplified and prioritised in relation to EU legislation pertaining to animal health and welfare. The review of Council Regulation 1/2005 must recognise the wide diversity of species transported between zoos and aquariums and their differing and specific welfare needs. EAZA's expertise, combined with existing IATA, AATA and CITES guidelines for transporting animals as held in zoos and aquariums, provide a sufficient framework to enable an effective self-regulatory environment.

We hope that you will take the arguments above onboard for the purposes of your assessment and remain at your disposal for any additional information you would like to obtain or for any questions you may have.

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#### **About EAZA:**

- The European Association of Zoos and Aquaria (EAZA) represents 322 members from 36 countries, 300 of which maintain public collections of animals. More than 280 institutions of the total EAZA membership are located within the European Union. EAZA member institutions receive approximately 140 million visitors a year and house more than 250,000 animals, excluding fish and invertebrates. EAZA member institutions employ 20,000 staff members, 5,000 of which are seasonal;
- EAZA has a significant social role in educating European citizens about animals, their conservation, and overarching threat processes such as climate change, habitat loss and how consumer behaviour interacts with these global challenges;
- EAZA has adopted the World Zoo and Aquarium Conservation Strategy (2005) which articulates the modern role of zoos and aquariums and their commitment to conservation;
- EAZA institutions in the European Union comply with Council Directive 1999/22/EC relating to the keeping of wild animals in zoos;
- EAZA encourages its member institutions to apply for approval under article 13 (2) of Council Directive 92/65/EEC;
- For more information about our association, please visit: [www.eaza.net](http://www.eaza.net)