



Position of LTO Nederland, the Dutch Agriculture and Horticulture Organization, on the Dutch proposal for amending the policy guideline on animal transport at high temperatures.

In February of 2025, the Dutch Minister for Agriculture, Fisheries, Food Security and Nature notified the Commission of an amendment to their policy guideline on animal transport at high temperatures (notification number 2025/0111/NL). The current policy guideline (notified at the time under notification number 2020/0129/NL) assumes a temperature limit of 35 degrees Celsius. With the proposed amendment, the temperature limit is lowered to 30 degrees Celsius. If this amendment would enter into force, it would pose a significant disruption of the EU's internal market, while it does not contribute to its envisaged goal of increasing animal welfare. In addition, the proposed amendment is proposed at a time during which the European Regulation on the protection of animals during transport and related operations (Regulation 1/2005) is under revision, which already contains new proposals for maximum temperatures for animals during transport. LTO considers it of utmost importance to ensure a level-playing field for operators, avoid disruption of the internal market and to prevent multiple policy changes on the same topic within a short timeframe.

LTO Nederland therefore urges the European Commission to reject the Dutch amendment to the policy guideline and to consider policy changes in the context of the ongoing revision of Regulation 1/2005.

Main arguments against the proposed amendment:

LTO Nederland states the following arguments against the amendment to the policy guideline:

1. Adoption of the amendment to the policy guideline will lead to a **significant disruption of the internal market**, considering that the temperature limits for animal transport will differ from neighboring countries. Enforcement will result in undesirable and complex situations at the border, possibly also leading to increased transport times for animals.
2. The proposed amendment will **interfere with the ongoing legislative process** on the revision of Regulation 1/2005. If the Dutch government adopts a lower maximum temperature now, it may very well be that within a year this limit is overruled by a new EU-Regulation for Animal Transport. This will make it impossible for the operators to do long term planning of their business.
3. The measure will **hamper the level playing field** for animal transport operators and the livestock sector as a whole. Not only Dutch operators will be affected, but also other EU businesses who conduct their business operations in the Netherlands and are depend on trade with the Netherlands.



4. The proposed measure does not take into account the significant **measures that have already been taken** by the livestock sector to ensure animal welfare at higher outside temperatures. There are already several additional measures and innovations that have developed over the past years.
5. There will be **significant practical and financial consequences for the livestock sector** when transport will not be possible for multiple days in a row, which is very likely at a maximum temperature of 30 degrees. Both the Dutch transport sector and the sector representatives of primary producers (Nepluvi, POV, SBK and COV) have made in-dept impact analyses. Main concerns are:
 - a) By lowering the maximum temperature for animal transport, the impact on animal transport will be very substantial and has adverse consequences, **both for animal welfare and also economically**. The supply of animals to the slaughterhouse as well as export and domestic movements are particularly complex logistical operations. Lowering the maximum temperature for transport makes this extra sensitive and partly impossible. As a result, fewer animals are supplied to slaughter and stay longer on livestock farms.
 - b) Both the supply of animals to the slaughterhouse and also the removal of meat is a particularly complex logistical operation. The schedules for this are drawn up a week in advance and cannot be fully implemented a day before. As an example, according to a legal obligation, a livestock farmer must deliver all health information about the animal to the slaughterhouse 24 hours before slaughter (the so called 'Food Chain Information' or VKI). All sales are concluded with supply contracts. For meat exports, containers, certifications and cargo areas, among others, must be planned several days in advance.

Attached to this document, LTO Nederland provides an analysis of the proposed measure for primary producers per sector for further consideration.



ANNEX: Impact analysis for primary producers per sector

The possible introduction of the policy rule will have a particular impact on the intensive sectors, where larger numbers have to be supplied and removed. For pig farming, LTO concurs with the impact analysis as will be provided by the Pig Production Organisation (POV). For the other sectors, an explanation is given below.

Poultry farms

The poultry industry will suffer substantial consequences quickly if no transport of poultry is possible for multiple days in a row. The consequences are especially large in the poultry meat chain, as also described by Nepluvi in their impact analysis. When slaughterhouses are unable to slaughter sufficiently and flocks of slaughter-ready broilers have to stay longer on poultry farms, welfare problems may arise. After all, the animals ready for slaughter do continue to grow. Needless to say: the longer it takes, the bigger the problems. This increasing, higher stocking density in the barn also leads to greater heat production in the barn. Especially with slaughter-ready animals, on hot days it is a challenge for poultry farmers to properly manage the risk of animal welfare risks. If the period lasts longer, upstream links, such as hatcheries, will also be affected. After all, new chicks are born daily and need to be placed somewhere in a barn, which requires broilers to be slaughtered first. Planning in the chain cannot possibly fully accommodate this. Given the high risk of increasing animal welfare problems, lowering the maximum transport temperature is undesirable. And in case it is nevertheless implemented, it is imperative that the NVWA (Dutch Food & Safety Authority) be more flexible in supervision hours during warm periods and thus maintain the number of required slaughter hours.

Veal Farms

If calves cannot be transported to an slaughterhouse and have to stay on the calf farm for significantly longer, there are consequences for their welfare. Those consequences become greater the longer that transport restriction lasts. After all, the calves continue to grow. In addition, the animals' feeding schedules are geared to a slaughter time; shifts in schedules will result in poorer condition of calves that are slaughtered later. Not being able to send calves to slaughter also means that no new young calves can be placed on the calf farms and therefore has an effect in the production chain. Calves have to stay longer on the dairy farm or preliminary calf farm (starter farm). Space on dairy farms for housing calves is often limited. Adding igloos and/or creating additional group housing is not immediately possible on all farms. The longer the restrictions last, the greater the impact, because once the restrictions expire, additional transport capacity is also not immediately available to catch up.

Sheep farms

A ban on cattle transport at 30°C will create new bottlenecks within sheep farming to a limited extent. The LTO sector representatives for sheep farming do, however, value the possibility of moving sheep to pastures with more shade and cooling, or bringing them inside, even when temperatures are high. This is especially necessary for animals that need individual care. A derogation for on-farm transport is therefore necessary to avoid animal welfare problems and to be able to intervene in animals being grazed.



Beef Cattle farms

A ban on cattle transport at 30°C will create new bottlenecks within the beef cattle industry to a limited extent. However, LTO Beef Farming representatives do value to the possibility of being able to move cattle to pastures with more shade and cooling, or to bring them inside, even when temperatures are high. This is especially necessary for animals that require individual care. A derogation for on-farm transport is therefore necessary to avoid animal welfare problems and to be able to intervene in animals being grazed. However, there are doubts about the need for the ban. The (French) beef breeds kept in the Netherlands can cope well with higher temperatures. The air speed during transport cools the animals, so the heat experienced is less than in the pasture or in the barn.

Goat farms

A ban on livestock transport at 30°C will be able to create new bottlenecks within goat farming to a limited extent for the sector plan on the handling of goatbucks, published last year by NGZO and LTO Goat farming representatives. This sector plan sets the goal of raising all goat bucks to suitability for human consumption by the year 2025. In goat farming, there is a very strong seasonal lambing season. There is a peak of lamb births in February and March. Increasingly, this peak leads to problems in the slaughter chain, caused in particular by a shortage of inspectors. Goat farmers are therefore advised to opt for staggered births. This should lead to better disposal of bucks in the slaughter chain. However, staggering also means that more births will take place in the months where the probability of temperatures above 30 degrees increases. Since transport mostly takes place in the evening hours, this need not cause immediate problems. But when goat bucks cannot be collected by the livestock trader, this is felt most quickly on farms that are tight on goat buck housing. Especially in North Brabant, there is a housing problem due to the strict goat moratorium in place there. This is because the North Brabant moratorium does not allow construction or renovation of goat farms, including for housing for goat bucks. In cooperation with ZLTO, the NGZO and LTO Goat farming representatives have made this government obstacle known in various ways to the Provincial Council, among others.

Dairy Farms

When dairy cows cannot be collected during hot days, this does not immediately lead to problems on the dairy farm. There is room on farms to keep the animals for a few days longer. However, a transport ban results in a significant proportion of slaughterings having to be postponed. Especially during prolonged heat, this could lead to major disruptions in the slaughter chain. In that case, dairy cows intended for slaughter will have to stay on the primary farm for a longer time, increasing the likelihood of welfare problems.



Rabbit farms

If the rabbits have to stay longer on the farms because transport is not possible due to heat, there is a maximum limit. Rabbits are kept in a fixed cycle with fixed transfer moments. Because rabbits have a short gestation and suckling period, the cycle rotates fairly quickly. However, it is common practice in the rabbit industry to load in the evening and drive at night and slaughter in the early morning. This avoids the hottest moments of the day. In addition, there is already an existing agreement that no transport is carried out at temperatures above 30 degrees. In addition, when temperatures are high, fewer rabbits are transported per crate and the truck is wet before transport. This gives the rabbits more opportunities to cool themselves during transport. However, it does remain a concern with further lowering of max temperatures and possibilities of transport.