

Summary of the call for evidence – Evaluation of the EU Animal Health Law

Meeting| 20 November 2024

Context and objectives

- The call for evidence (Cfe) was conducted to support the ex-post evaluation of the [Animal Health Law \(AHL\)](#) by the European Commission, including its delegated and implementing acts. This evaluation aims to assess the AHL's performance based on five criteria: effectiveness, efficiency, relevance, coherence, and EU-added value.
- The Cfe was published on the [Have Your Say website](#) and was open for four weeks between (06 March - 03 April 2024). It targeted a wide range of stakeholders, including the general public, national competent authorities and agencies, international organisations, industry and producers' associations, veterinarians, NGOs and other interested groups.
- The call for evidence gathered opinions and evidence on the key elements of the AHL, such as the law's functioning, its impacts, and other relevant information. Respondents were specifically encouraged to provide their input on opportunities to reduce the administrative burden for stakeholders and suggest potential simplifications.

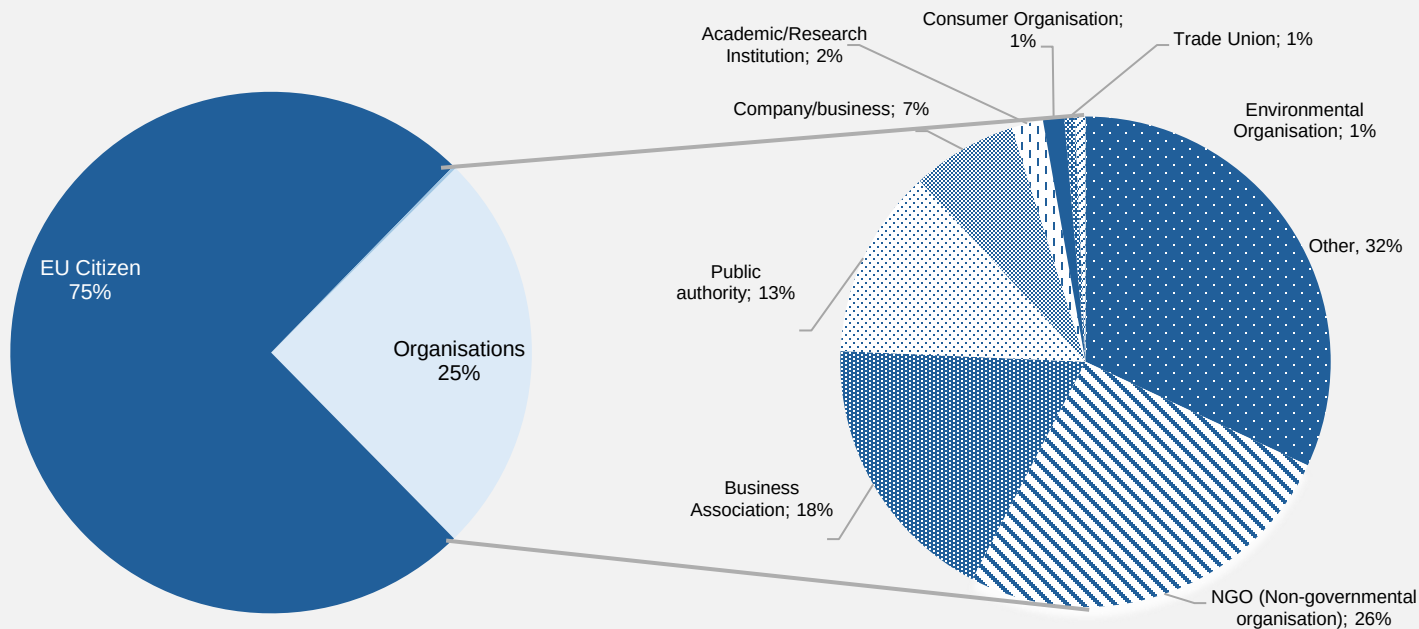


Overview of respondents

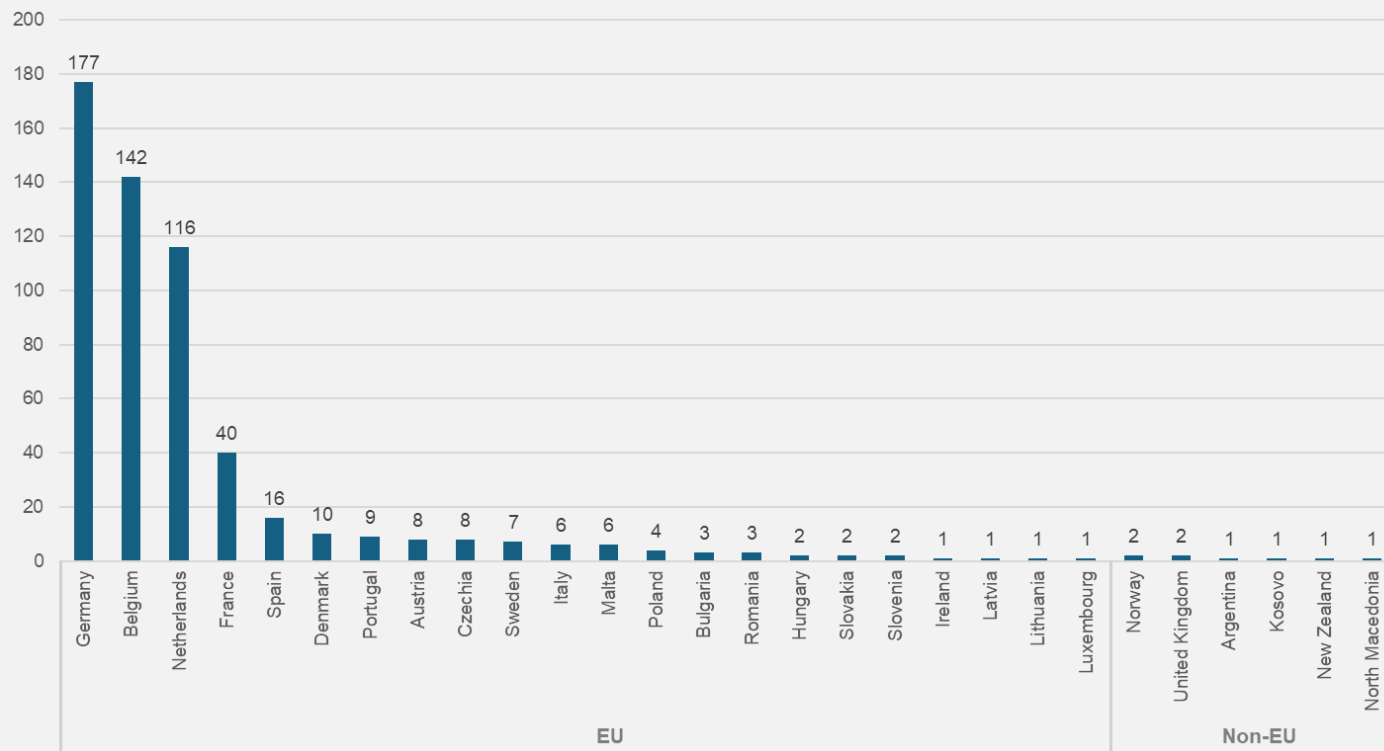
Response summary: Duplicates and campaigns removed

- **Total number of responses submitted:** 942
- **Excluded responses:** 369 (due to duplication or organised campaigns)
 - **Duplicates:** 61 (identical responses, merged submissions of different sections, or highly similar responses with only minor differences like punctuation or word order).
 - **Responses associated with a campaign:** 308 (from 3 distinct campaigns)
- **Final number of responses analysed:** 573

Responses per stakeholder group



Responses by country of origin



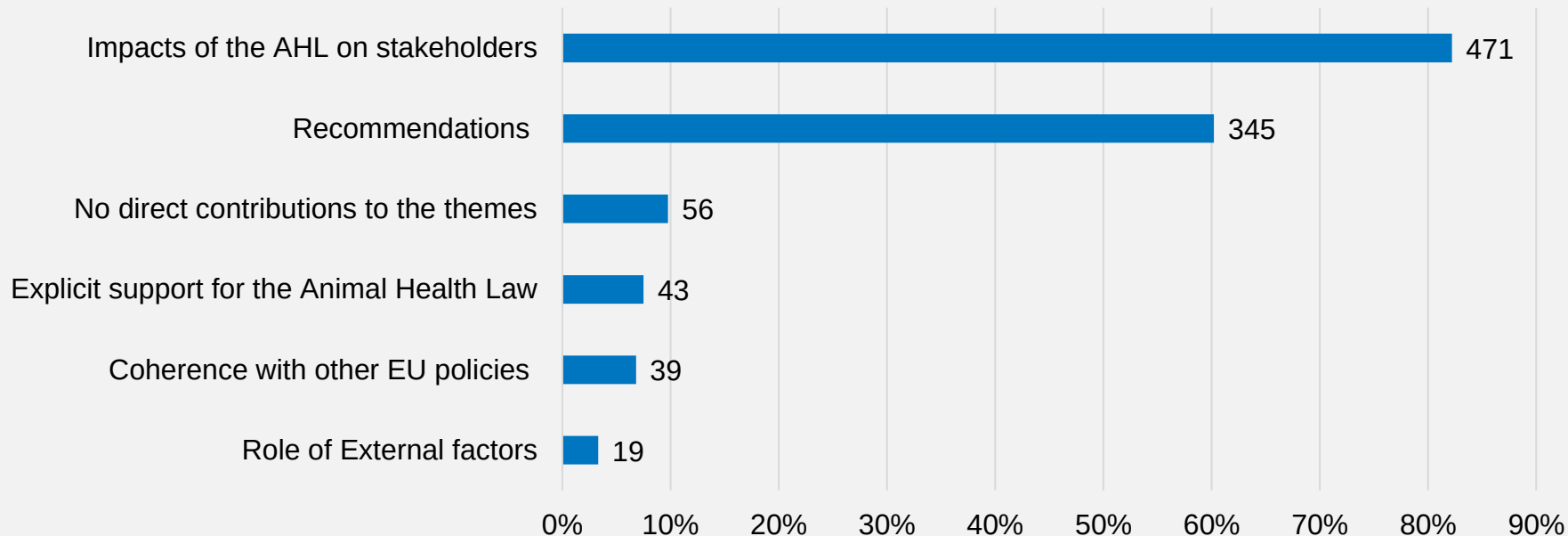
Summary of replies



Methodological approach

- Respondents were encouraged to suggest ways to reduce the administrative burden and propose potential simplifications. This emphasis may have introduced a **bias in the responses** toward identifying issues rather than successes.
- To analyse the responses received from the Cfe, we used automated tools to scan all 573 responses and identify responses linked to the themes identified in the intervention logic of the AHL. In total, **517 responses** contributed directly to the identified themes.
- Each response was then categorised based on these themes, allowing us to quantify how many respondents supported specific themes. Since a single response could be relevant to multiple themes, their contribution **might be counted towards** multiple thematic areas.

Number of responses commenting on themes



Effectiveness

Some respondents praised the law's effectiveness, expressing support for its implementation. In particular:

- Several respondents praised the AHL's **risk-based approach**, noting that this new approach replaces the former EU method, which focused primarily on eradication rather than preventive measures.
- Several respondents stressed the **clarity of roles established** by the law.
- Some respondents highlighted the importance of **categorising diseases** in terms of disease preparedness, prevention, and control. A few of these respondents specifically emphasised that the AHL provides a robust framework aligned with the 'One Health' principle, streamlining legal requirements for the movement of animals and products within the EU.

Effectiveness

Several concerns were raised regarding the AHL's impact:

- Many respondents raised concerns about the **negative impact on animal welfare**. Some cited issues with certification requirements (like TRACES) and disease treatment procedures that could reduce welfare if owners opt out of necessary actions. Quarantine requirements were also seen as leading to delays and extra costs, affecting animal welfare.
- Many respondents pointed out **differences in implementation**. They highlighted inconsistencies in how regulations are applied across Member States, resulting in disparities in costs and compliance. Many called for more uniform implementation to ensure the AHL's objectives are met.
- Some respondents mentioned concerns about the **risk of competition distortion** due to differences in regional law implementation.

Effectiveness

Several **suggestions for improvement** were mentioned:

- Most of the respondents expressed the need for **greater flexibility in the Regulation**. Suggestions included implementing more flexible procedures for health certificates and TRACES documents, allowing them to be signed by veterinarians familiar with the breeder or hobbyist and their collection.
- Many respondents suggested **greater cooperation among stakeholders** to ensure continued effectiveness in safeguarding food safety, food security, and animal health within the EU.
- Many respondents recommended **improving communication and dialogue between stakeholders** when drafting and enforcing laws.
- Some respondents recommended a **better categorisation of diseases**. They pointed out a lack of clarity in some definitions regarding the current categorisation of diseases, which could lead to confusion in disease management.
- A smaller group of respondents suggested **integrating advanced digital tools and technologies** to streamline processes such as enhanced digitalisation (e.g., e-certification and traceability data streamlining) and deploying technological advances (e.g., interfaces for different entry platforms).
- A smaller group of respondents **recommended providing training, sharing best practices, and providing additional support** to ensure compliance with regulations and improve the overall implementation of these measures.
- A few respondents stressed the need **for greater cooperation between Member States**. They called for enhanced collaboration and information sharing among government bodies, research institutions, and veterinary experts to strengthen preparedness for disease outbreaks, control measures, and pandemic responses.

Efficiency

Most of the respondents expressed concerns about the **administrative burden** imposed by the AHL due to more regulatory requirements and additional paperwork needed to obtain the necessary certificates.

- Hobbyists are reported to be the primarily affected groups. Other groups affected, to a smaller extent, included farmers, competent authorities, veterinarians, and economic operators other than farmers.
- Among the stakeholders (excluding hobbyists), the administrative burden was mainly associated with **general administrative tasks** linked to the overall implementation of the AHL and the **movement of animals**. Only a few reported burdens related to traceability, enforcement of rules and disease control measures, such as vaccination and other inquiries.

Efficiency

Nearly half of the respondents expressed concerns about the **additional costs** of acquiring new documents (i.e. TRACES certificate).

- Hobbyists are reported to be the primarily affected groups. Farmers, competent authorities, economic operators other than farmers and veterinarians were also reported to be affected on a smaller scale.
- Among the stakeholders (excluding hobbyists), concerns about costs were mainly related to the **movement of animals** and additional **general costs** linked to the overall implementation of the AHL. Only a few respondents also reported costs associated with enforcement of the rules, traceability and disease control measures.

Efficiency

In line with the reported costs and burdens, various stakeholders requested **legal exceptions or consideration of specific circumstances** in their **suggestions for improvements**.

- Most of the respondents proposed tailored **exemptions for hobbyists**, suggesting that current measures such as animal limits, transport permits and cross-border movements could be adjusted to better suit their needs.
- A few respondents, including **exotic and zoo animal owners** and **wild animal owners**, requested more flexibility, emphasising the importance of private ownership for species preservation and calling for adjustments to reduce costs and barriers to genetic exchange.

Coherence

Respondents stressed the importance of **external factors** on the AHL:

- Several respondents cited **climate change** as a growing concern. Some stakeholders argued that animal transport regulations must be adapted to the growing impact of climate change (e.g. heat). Others emphasised that as climate change accelerates and untouched habitats diminish, maintaining genetically healthy populations in captivity becomes vital.
- A few respondents noted the need for adaptable regulations in response to **geopolitical challenges**, such as the Ukraine-Russia war, as well as global issues like pandemics and cross-border diseases.
- A few respondents stressed the **role of technology in animal management**, with tools like foot rings, transponders, and microchips seen as essential for efficient bird identification, traceability, and emergency response.

Coherence

Stakeholders emphasised the opportunity to enhance consistency with other key regulations:

- Some respondents welcomed the alignment with the **One Health approach**, highlighting its crucial role in integrating animal health and welfare. They recommended reinforcing this principle within the AHL, noting that effective animal health management must consider animal welfare to achieve better health outcomes.
- Respondents also suggested revising the AHL to adopt rules for structural and EU-wide harmonisation, building on existing policies such as the **European Green Deal**, the **Farm to Fork Strategy**, and other regulations such as the **Official Controls Regulation**, the **Veterinary Medicinal Products Regulation**, the **Food Law**, and the **Hygiene Package**.

Relevance

The large number of respondents to this call for evidence shows the **importance of the AHL**. In particular:

- Many respondents explicitly expressed their **general support for the AHL** and welcomed the regulation's overall framework.
- Some respondents appreciated the **comprehensiveness of the legal framework**, and
- A few respondents valued its **simplified and unified nature**.

At the same time, many respondents pointed out the **complexity of the law**. Stakeholders noted that the detailed and extensive texts make it difficult to identify the relevant sections, and the linear format could benefit from adjustments to improve clarity and ease of implementation.

EU added value

- Several respondents noted that **greater harmonisation in the rules** is needed, particularly in implementing preventive measures across Member States, with a focus on ensuring consistency in border regions.

Campaigns

Campaign 1: The campaign raised concerns about the high costs and excessive bureaucracy associated with TRACES certificates. It argued that these certificates impose significant financial burdens on hobbyists, with veterinarians often lacking specialisation in the species they evaluate, leading to inadequate health checks. It was published by Vereinigung für Artenschutz, Vogelhaltung und Vogelzucht (AZ) e.V. A total of 17 responses were excluded from this campaign.

Campaign 2: The campaign argues that the AHL creates obstacles that threaten biodiversity and conservation efforts. It argues that the regulations take away valuable time and resources from caring for animals, making it harder to contribute to conservation and protect genetic diversity. The campaign calls for exceptions to be made to preserve these activities, stressing the importance of supporting the natural connection between humans and wildlife. It was published by ProNaturA France and Federación Fauna. A total of 191 responses were excluded.

Campaign 3: The campaign raised concerns that current EU regulations on animal health certificates for bird movements (Article 71 of Regulation 2020/688) impose excessive costs and administrative burdens on hobby birdkeepers. Particularly, the campaign argued that the TRACES certificate is disproportionately expensive compared to the value of the birds being transported. It was published by two non-profit organisations, Kleindier Liefhebbers Nederland and Aviornis International Nederland. A total of 100 responses were excluded.

Thank you

