



Entente Européenne d'Aviculture et de Cuniculture **EE**

Europäischer Verband für Geflügel-, Tauben-, Vogel-, Kaninchen- und Caviazucht
European Association of Poultry, Pigeon, Cage Bird, Rabbit and Cavy Breeders
Association Européenne pour l'Élevage de Volailles, de Pigeons, d'Oiseaux, de Lapins et de Cobayes

Concerning : Delegated Regulation EU 2020/688

Beverlo, April 15th 2021

Dear Ms Kyriakides,

I am writing you on behalf of the Entente Européenne d'Aviculture et de Cuniculture, usually known as the Entente Européenne. This is a European organisation of breeders of poultry, ornamental pigeons, rabbits, guinea-pigs and cage-birds. It was founded 83 years ago in Brussels and represents about 2 million breeders from EU Member States.

In the last months there has been a lot of concern among our members about Delegated Regulation (EU) 2020/688, laying down the requirements for movements of terrestrial animals. This new regulation has an enormous impact on breeders of captive birds, because it makes international exhibitions of captive birds almost impossible and the exchange of birds for hobby purposes between breeders in different Member States becomes complicated. Further, both become very costly due to the obliged animal health certificate issued by the competent authority of the Member State of origin.

The International Colombophile Federation (international racing pigeon federation) had similar problems. We noticed that considered their arguments and proposed to amend DR 2020/688 in such a way that border crossing sporting events with racing pigeons can continue in the EU. We hope that you consider our arguments as well. We've already been in contact with your services but we'd like to point out once more the urgency for our members to get answers soon. Several international events are planned for next autumn and winter and in this Covid-19 era were the social circumstances are very harsh on people, everyone is very hopeful that a successful vaccination campaign will allow us to finally meet again on exhibitions for the first time in two years. The uncertainty around Delegated Regulation (EU) 2020/688 however causes organizers to hesitate taking the next steps and investing money in these events and they keep coming to us for answers which we cannot provide. Therefore we'd like to present our arguments once more and kindly ask for quick solutions or, if this would not be possible because of other priorities, for an additional delay of those parts of the Delegated Regulation (EU) 2020/688 that concern us for another four months so that at least, if the Covid-19 situation allows it, our foreseen exhibition season 2021-2022 could go on the same way it has always before.

Importance of our hobby and our exhibitions

It is an obligation of each Member State towards the Food and Agricultural Organisation of the United Nations to contribute to biodiversity and to preserve the genetic resources of their breeds for future generations. Since cryopreservation is a very limited option for birds, most Member States do not actively fulfil this duty and leave the responsibility to organisations of breeders for hobby purposes, mostly without any kind of funding. So, the conservation of all authentic avian breeds and their genetic diversity is almost exclusively maintained by breeders for hobby purposes. International exhibitions have a very important function in the

contacts between breeders of different Member States. These contacts are necessary to set up breeding programs to guarantee genetic diversity.

Each year, there are a lot of international exhibitions of captive birds from different Member States. These exhibitions are only allowed when the organising Member State is considered free from avian influenza. Further, only captive birds from Member States free from avian influenza restrictions are allowed to participate. If the epidemiological situation doesn't allow it, no exhibitions are organized. Please note that it is also priority for the breeders that their animals remain healthy.

Impact of DR 2020/688 on exhibitions

DR 2020/688 requires that captive birds have been continuously resident in a registered or a confined establishment for at least 21 days prior to departure. From the perspective of animal welfare this is not desirable and in practice not feasible. It is, however, possible that the birds are quarantined at the breeder's facilities i.e. no new birds will be introduced to the same facility of the breeder for at least 21 days prior to departure.

DR 2020/688 requires also that an animal health certificate issued by the competent authority accompanies the moved birds. The health inspection concerns only an observation of the birds, a clinical examination is not carried out. Captive birds to be exhibited are always clinically healthy and in optimal showing condition (note that no breeder will send sick birds to a show and risk having his or her reputation damaged). As a result, the animal health certificate will always be issued but such a certificate is expensive in most Member States and requires the availability of official state veterinarians within 48 hours before departure, which is not always possible limited availability of such state veterinarians. As there are also hardly any epidemiological risks, it is in our view a disproportional measure. At the exhibition, all birds are under the surveillance of a veterinarian from arrival till departure and all required attestations are checked by veterinarians upon arrival of the birds. During the last two decades, a health certificate issued by the breeder's veterinarian within 48 hours before departure was required for all the international exhibitions. This practice has been effective during the whole period. We, therefore, believe it is reasonable that this practice is continued. A self-declaration, as proposed for racing pigeons, would also be an acceptable alternative.

Exchange of birds and registration

The exchange of (rare) birds between breeders of different Member States will extremely be reduced when an animal health certificate issued by the competent authority of the Member State of origin and a 21 quarantine period in a registered or a confined establishment other than that of the breeder remains required.

Since the animal health certificate needs to be issued within 48 hours before departure and contain the identification of the birds, it becomes impossible to visit a breeder and decide on the spot which bird or birds are suitable to bring new genes into the visitor's flock. This also applies to endangered species kept by only a few breeders in the EU. To keep species and breeds healthy and to avoid genetic loss caused by inbreeding, the exchange of breeding animals is vital. As already stated before, these birds are mainly kept for hobby purposes and not as a profession. This means that there is generally a lower limit on the amount of money that can be spent.

The exchange of breeding stock between individual non-commercial breeders rarely consists of more than just a few birds. Therefore, we also propose that non-commercial breeders with a total of less than 200 birds at their facility are excluded from registration and certification as required by the Animal Health Law (Regulation 2016/429) and its delegated regulation 2020/688. Scientific studies have shown that the small-scale rearing of captive birds is not a factor in the epidemiology of avian influenza. This low risk also applies to other health

conditions. The contacts with other captive birds are limited and the numbers are too small to be the basis of a major outbreak. Also, there is never any direct contact with commercially kept poultry. Until now, no examples of disease spread through intra-Member State exchange (and international exhibitions) of captive birds have been documented. The consequences of the proposed measures are therefore considered disproportionate to the perceived risks.

Finally, we would like to respond to the statement of the European Commission the provisions of Delegated Regulation 2020/688 have been discussed with stakeholders. This implies that the consequences for our members were known and no objections were made. However, the stakeholders that were involved in this discussion were EFSA registered stakeholders. Entente Européenne is not registered because we were unaware of this kind of registration (but now we will apply of course). Entente Européenne is an organisation for hobby purposes and the work is exclusively done by volunteers. We have no financial resources available to hire lobbyists or other professionals to represent our organisation at EU level. We are therefore asking you for any future legislation that impact animals for hobby purposes to actively verify if the appropriate stakeholders are involved and if not, to involve also organisations outside the list of EFSA registered stakeholders. This in the interest of millions of EU civilians that breed animals for hobby purposes and contribute to biodiversity by doing so.

Sincerely Yours,

Dr. med. vet. Andy Verelst
President of the EE poultry section
EE board member
Roldragersweg 36
3581 Beverlo
Belgium
gefluegel@entente-ee.com



Copy sent to several EU MP's which follow up this case.