

European Commission
National Ministries of Agriculture of EU-countries

To whom it may concern

October 30th 2014

Referring: EU-directive 2014/0032

Dear Madam, Sir,

The European Holstein and Red Holstein Confederation (EHRC) represent 28 member Herdbook organisations from different countries in Europe, all active in Holstein breeding.

In the EHRC – board meeting of the 24th September 2014, the proposed legislation of EU-Directive 2014/0032 was discussed. It soon became evident during the discussion, that there was not a unanimous agreement amongst the EHRC board about many of the proposed changes, reflecting the variety of opinion across Europe.

The board did unanimously agree regarding the definition of Purebred animals.

The board members discussed the definition of Purebred animals as the present legislation is open to different interpretation, with the result that member EU-countries use different definitions for Purebred animal status. This causes problems on a regular basis, when herd book registered 'purebred' animals move from one EU-country to another.

To clarify and simplify the proposed regulation the EHRC-board advises to modify the EU-directive 2014/0032, Chapter 1 General Provisions, Article 2 Definitions, point ii Purebred Animals; as follows:

Purebred animals: Animals are considered purebred of a specific breed, when the percentage blood of that specific breed is 87,5% or more.

This clear definition would mean that in cases of crossbreeding, the 1st crossbred (F1) and 2nd crossbred (F2) are not considered purebred; but the F3 animal (3rd generation) is becoming purebred for that specific breed.

A clear and simple definition would ensure equality of breed purity status in the trade of animals between EU-countries.

We hope to have informed you properly and are confident in your understanding.

Yours sincerely,

David Hewitt,

Secretary General EHRC